

Modern Slavery Report

[September 1, 2022 – August 31, 2023]

Ledcor Limited



This Modern Slavery Report (the “**Report**”) is made on behalf of Ledcor Limited (“**Ledcor**”) and certain of its subsidiary or affiliated corporations as follows: Ledcor Industries Inc., Ledcor Construction Limited, Ledcor Construction Group Ltd., Ledcor Construction & LTS Group Ltd., Ledcor Pipeline Limited, Ledcor Contractors Ltd., Ledcor Constructors Inc., LTS Solutions Ltd., LTS Group Ltd., LTS Build Services Ltd., Ledcor CMI Ltd., Ledcor Industrial/Mining Group Ltd., Ledcor Leasing Limited, L&S Limited Partnership, L&S Coastal Limited Partnership, L&S Construction Services Ltd., L&S Coastal Investments Ltd., Ledcor Pipeline Investments Ltd., and Ledcor Projects Inc. (collectively with Ledcor, the “**Ledcor Group**”, “we,” “us” or “our”). This Report addresses our most recent fiscal financial period from September 1, 2022 to August 31, 2023 (“**FY2023**”) and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “**Act**”).

1. Introduction

As a leading construction business in Canada, the Ledcor Group recognizes the important role that we have in ensuring that our operations and projects, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced and child labour (as defined in the Act) in our supply chain. This Report sets out the steps we have taken during FY2023 and since the Act went into effect in 2024 to prevent and reduce the risk that forced and child labour is used at any step in the production of goods in Canada or elsewhere or of goods imported into Canada.

2. Our Business

The Ledcor Group is headquartered in Canada. We are a diversified construction conglomerate that designs, builds, operates, and maintains construction projects across Canada. The Ledcor Group’s supply chain includes manufacturers that supply goods and services to our organization that are incorporated into the projects we build. Examples of the suppliers we engage include businesses that manufacture and/or install fiber cables, power cables, material required for installation of telecommunications equipment, piping and fittings, electrical and instrumentation equipment, structural steel and assemblies, consumables and tools, pre-engineered buildings,

precast trench bases, doors and hardware, vehicles, and mobile construction equipment. These materials and services are primarily sourced from North American manufacturers. On rare occasions we source materials from manufacturers and suppliers in other countries, excluding those countries Canada does not have trade agreements with or has imposed import restrictions upon. Further information about our business can be found on our website at www.ledcor.com.

3. Our Policies

Policies

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our partners, and make it clear that we do not tolerate any violations of the law, which would include any forms of forced and child labour. We are committed to consistently evolving and improving our approach. We abide by applicable laws regarding forced and child labour in the jurisdictions in which we operate, and since March 2024 our policies also expressly set out that we will not tolerate forced and child labour in any of our operations or by suppliers working for us. We make a concerted effort, including our due diligence of our subcontractors and suppliers and monitoring of their performance, to prevent our activities having a negative impact on human rights. Our relevant policies are discussed in further detail below:

Employee Code of Conduct & Ethics

We are committed to the highest standards of integrity in all our activities and always conducting ourselves in an open, ethical, and fair manner. Our Employee Code of Conduct & Ethics (the “**Employee Code**”) is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Ledcor Group employees, independent contractors, and agents (collectively “**Representatives**”) should always act lawfully, adhere to high ethical standards and in the best interests of the Ledcor Group. The Employee Code requires our Representatives to comply with laws by including the following language:

“COMPLIANCE WITH LAWS

Representatives will comply with all laws and professional standards applicable to our business in the countries, provinces, states, cities, and local communities where we operate. If you have questions about specific laws, please contact Ledcor’s Legal department.”

Since 2024, the Employee Code includes the following additional language:

“FORCED AND CHILD LABOUR

Ledcor recognizes that slavery and trafficking, in all forms, represent a violation of fundamental human rights and are prohibited by law. Ledcor does not tolerate the use of any form of child or forced labour, slavery, or human trafficking in any of its operations or facilities.

Ledcor recognizes the importance of implementing appropriate measures to mitigate the risk of slavery and human trafficking in its operations. The production, purchasing, importation or distribution of goods that in any way involve the use of human trafficking, slavery, indentured, forced or child labour (“**modern slavery**”) is strictly prohibited. If employees become aware of or suspect any modern slavery activities by co-workers, clients, vendors or anyone else they encounter in the workplace, they must report this immediately to their manager, Human Resources, or Ledcor’s Legal department.”

Business Partner Code of Conduct

Similarly, the Ledcor Group Business Partner Code of Conduct (the “**Partner Code**” – established in 2024) is an extension of the Employee Code and provides a guide for conduct and actions of every third party with whom the Ledcor Group does business. We expect our partners, suppliers, subcontractors, consultants, representatives together with anyone working for them or acting on their behalf (including their employees, independent contractors, and agents and anyone in their supply chain) (collectively “**Business Partners**”) to comply with all applicable legal requirements in the jurisdictions in which they operate by including this obligation in all subcontract and supplier agreements. As well, beginning in 2024, we will request that (i) our Business Partners comply with our Partner Code and consistently monitor and enforce it in their own operations and supply chain; and (ii) in addition to a similar section on compliance with laws as exists in the Employee Code noted above, our Business Partners specifically comply with the following regarding forced and child labour:

“FORCED AND CHILD LABOUR

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Ledcor recognizes the importance of implementing appropriate measures to mitigate the risk of slavery and human trafficking in its

operations, either directly or through its Business Partners. Ledcor is committed to sourcing products, labour and services from Business Partners with impeccable human rights records. Business Partners must not participate in the production, purchasing, importation or distribution of goods that in any way involve the use of human trafficking, slavery, indentured, forced or child labour (“modern slavery”).

Ledcor’s Business Partners are expected to have anti-modern slavery guidelines, policies and practices in place that are communicated throughout their organization, upheld by all levels of management, and that are applied to their own supply chain activities.”

The Partner Code also sets forth our values and guiding principles. We use reasonable efforts to engage with Business Partners that are committed to these same principles and who commit to these standards as a condition of doing business with us. We are committed to reviewing our Partner Code on a regular basis to ensure that this policy is in line with current best practices.

Whistleblower Policy

Within the Employee Code is our Whistleblower policy (in effect during the reporting year) which states the following:

“Whistleblower

We want you to report complaints or concerns about our business and operations including, but not limited to any accounting, audit, procurement, contract or other violation of this Code or other business practice or conduct that appears to be illegal, unethical, or improper (each a “Violation”).

Each complaint will be treated as confidential and the anonymity of the complainant, if requested, will be preserved to the fullest extent reasonably possible in light of Ledcor’s need to investigate the complaint, the requirements of applicable law and Ledcor policies. Retaliation against any Representative who has made a complaint in good faith regarding an alleged Violation, or who has cooperated in the investigation of such complaint, is prohibited.

It is the expectation that all Representatives will cooperate with any investigations regarding complaints related to alleged Violations.”

As well, the Partner Code, introduced in 2024, encourages our Business Partners in our supply chain to report complaints or concerns and contains specific language on how these parties can report to the Ledcor Group. The Ledcor Group provides multiple channels to report complaints or concerns such as reporting:

- to a Ledcor Group representative or the Ledcor Legal Department;
- to Ledcor Group's Ethics Officer; and
- Anonymously to Ledcor Group's Ethics Hotline.

Due Diligence

We expect third parties with whom we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, if we have a concern about a Business Partner's ability to meet our values expectations, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

We acknowledge that those working in our supply chain may be at potential risk of forced and child labour. To mitigate this risk, we follow a due diligence approach that includes the following steps:

- **Contractor Default Insurance.** In our businesses that heavily rely on subcontractors (e.g., Ledcor Construction Limited), we maintain contractor default insurance to mitigate the risk of default. To be covered under this insurance, each subcontractor must be vetted and approved. This approval process covers financial and operational history.
- **Contractual.** As detailed further above, we embed specific language in our contracts with Business Partners that requires them to comply with all laws and (effective in 2024) our policies that address expectations of conduct and actions, including those related to forced and child labour.
- **Certification.** In 2024, when the Act went into effect, we began requesting (where reasonably feasible) that each of our business units ask their suppliers to certify specifically (by signing a Supplier Certification) that they are in compliance with the Act.

4. Assessing Our Risk

The potential risks of forced and child labour in our supply chain are primarily related to the types of products we import, the raw materials or commodities used in our supply chains, and our suppliers. We do not control our suppliers and despite our efforts to take increased actions to ensure our supply chain is free of any forced or child labour, there nonetheless remains a risk of forced or child labour on products we source from third parties where we may not have visibility into their supply chain.

The Ledcor Group is in the process of evaluating effective strategies to better identify the risks of forced and child labour in its supply chains building upon the Partner Code adopted in 2024. Although we have not identified any forced or child labour in our activities and supply chains, we remain dedicated to continuous monitoring and caution.

5. Our Commitments

The Ledcor Group is committed to implementing strategies and processes to better identify and prevent the risks of forced and child labour within its operations and supply chains.

Steps to Prevent and Reduce Risks of Forced and Child Labour

Examples of steps taken to prevent and reduce risks of forced and child labour include:

- Implementing contractual clauses that require subcontractors and suppliers to comply with all laws in the jurisdictions in which they operate in addition to (since 2024) compliance with anti-forced and child labour laws.
- Implementing codes of conduct that cover compliance with laws and whistleblower policies as well as creating multiple channels to report complaints and concerns.
- Auditing and monitoring subcontractors through contractor default insurance vetting.

Remediation Measures

Our Employee Code and our Whistleblower Policy require all Representatives of the Ledcor Group to report actual or possible misconduct. Similarly, our Partner Code requires that our Business Partners report complaints and concerns about the Ledcor Groups' and/or its Business Partner's businesses and operations. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced and child labour is mitigated in our business. No instances of forced or child labour in our operations or supply chains were identified during the reporting period and, therefore, we did not take any measures to remediate any forced and child labour arising from such measures.

Although we are not currently aware of any forced and child labour in our business and supply chains, if we were to discover any forced and child labour in our business and supply chains, we would consider taking any or all of the following measures to immediately remediate such forced and child labour:

- Suspension or termination of a supplier, sub-supplier, or subcontractor.
- Take action to prevent forced and child labour and associated harms from reoccurring.

Training

Every year, Ledcor Group employees at all levels are required to complete a mandatory certification process to ensure that our Employee Code is understood and properly applied to our activities. Every new employee of the Ledcor Group must complete mandatory online training on our values and policies, including our Employee Code, and is informed of how to report wrongdoing under our Whistleblower Policy. We provide employees with ongoing and periodic training opportunities to ensure that all employees stay current on our expectations and the law.

6. Our Progress and Effectiveness

As part of our governance processes, we review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date no concerns or complaints regarding forced and child labour in our supply chains have been identified. We also assess the effectiveness of our policies by reviewing all the organizations policies on a regular basis.

7. Approval & Signature

This Report was approved by the Board of Directors of Ledcor Limited in accordance with section 11(4)(b)(ii) of the Act on May 28, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at www.ledcor.com.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Dave Lede, Chairman & CEO

May 28, 2024

I have the authority to bind Ledcor Limited.