



A COLAS COMPANY

## Forced and Child Labour in Supply Chains Report 2024

This report is prepared pursuant to Section 13(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Act”). This report sets out the steps MILLER PAVING LIMITED (“Miller”, “we”, “us”, “our”) has taken in the previous financial year, ended December 31<sup>st</sup>, 2023, to prevent and reduce the risk of forced and child labour throughout every step of our supply chain, including the import of goods by us to Canada.

### (a) Our Organizational Structure and Supply Chains

At Miller, we take pride in conducting our business responsibly and to the highest ethical standards. As part of a global network of Colas companies, we are a world leader in transportation infrastructure and maintenance. Globally, the Colas Group operates in three cornerstone business segments: Roads (road construction and maintenance), Materials (production and recycling of construction materials, mainly aggregates and bitumen) and Railways. The Colas Group is part of the larger Bouygues, an international diversified services group operating in over 80 countries.

In Canada, Colas operates as a holding and management company with operating companies across Canada. Since commencing our operations in Eastern Canada in the early 1960’s, Colas has grown to employ approximately 8,500 employees nationally. Through our national network of companies, we provide private and public clients with transportation solutions, which include construction, rehabilitation, and preservation of roads, highways, airport runways, and ports; manufacturing and recycling of construction materials; signage, safety, and traffic management systems; utilities network installation and maintenance; and railroad infrastructure, construction, and maintenance.

Our supply chain is engaged through individual orders, framework contracts, and subcontract agreements. Miller is committed to vigilance regarding its suppliers and subcontractors to prevent the risk of human rights abuses. The Bouygues Group Code of Ethics (the “Code”) requires that all our supply chain members comply with the Group’s Corporate Social Responsibility (“CSR”), which encompass the 10 principles of the UN Global Compact, including support and respect for human rights, commitment to not be complicit in human rights abuses, the elimination of all forms of forced and compulsory child labour, and the abolition of child labour.

### (b) Our Policies and Due Diligence Processes

The observance of ethics and integrity is an integral management principle throughout Miller. The Code sets out core values that govern our day-to-day activities and the way we conduct our business. We recognize that modern slavery, in its various forms, causes suffering to communities and individuals globally. The Code reflects our ongoing commitment to prevent and reduce the risk of forced and child labour throughout our organization and our supply chain.

Internally, it is expected that employees conduct themselves in accordance with the Code and to know and stay committed to the Group’s CSR standards, which specify respect for persons is a key principle governing our organization. Respect for persons encompasses compliance with the principles of the UN’s Universal Declaration of Human Rights and the fundamental conventions of International Labour Organization concerning forced and child labour. Employees are required to certify being informed of the Code and managers, corporate officers, and purchasing agents are required to personally commit to comply, and ensure compliance, with the Code.

The Code stipulates that Miller expects the same commitment with respect to forced and child labour to be adopted by its contractors, suppliers, and other business partners. In an effort to prevent violations of law throughout our supply chain, Miller has pre-qualification mechanisms for approval of significant vendors we work with. On a case-by-case basis, this process may include information request, pre-qualification form, and global background checks to evaluate history of compliance with domestic and international laws.

Through developing Preferred Vendor Catalogues, Miller intends to ensure organizational uniformity in the use of approved suppliers and subcontractors believed not to engage in forced and child labour in their business. Our pre-qualification process together with the expectation that supply chain members comply with the Group’s CSR Charter, or at least as vigorous standards, compliment other due diligence measures we have implemented to maintain a system of awareness, accountability, and transparency across our business.

#### THE MILLER GROUP – HEAD OFFICE

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Miller is committed to maintaining an honest and open environment in relation to all aspects of our operations. Transparency across our business and supply chain allows us to promote confidence between us and our stakeholders. In this regard, the Code explicitly encourages reporting concerns with respect to violations of the Code through the Whistleblowing Platform. All employees are expected to speak out if they reasonably suspect malpractice within Miller, and no employee suffers any detrimental treatment as a result of reporting a good faith concern, including a suspicion of forced or child labour within our business or our supply chain.

### **(c) How We Manage and Assess Risk of Forced and Child Labour within Our Business**

Forced and child labour prevention is an ongoing agenda item and an area of significant focus for our sector of business. At Miller, we recognize that the construction industry is considered a high-risk sector for labour exploitation, and we remain committed to countering that risk within our business and supply chain. All existing measures detailed herein are subject to ongoing review and additional measures may be developed and implemented, as deemed appropriate in our sole discretion.

Miller's compliance with applicable local and international laws pertaining to employer obligations, such as regulations governing minimum and living wage, serve to underpin the steps we are taking to ensure that forced and child labour are not present in our business. Our recruitment and selection processes are attuned to forced and child labour through identity checks (including ensuring that employees are in possession of their own identification documents), and verification of references for permanent and temporary staff.

Our assessment of increased risk of forced and child labour indicates that a particular area of focus is where relatively low skilled operatives are engaged through subcontract arrangements in our operational business. As such, we remain committed to raising awareness in such parts of our business and to continue to liaise with suppliers to confirm ongoing compliance or equivalence with the Code and the Group's CSR Charter.

### **(d) How We Address and Remediate Forced and Child Labour**

The Code explicitly requires that employees read and comply with the annually published Group vigilance plan, which includes the requirement that employees take reasonable measures in their day-to-day activities to identify and prevent the risk of serious human rights violations within our business and supply chain. Miller employees are expected to know the significance of compliance with the Code and that failure to comply therewith may result in disciplinary action, up to and including termination.

Our expectations regarding supply chain behaviour are reinforced through distribution of, and the requirement for compliance with, the Group's CSR Charter, or equivalent standards, for suppliers and subcontractor. The CSR Charter sets an expectation for significant suppliers and subcontractors to comply with the principles of the UN Declaration of Human Rights and the Fundamental Conventions of International Labour Organization (ILO) and other applicable labour laws, inclusive of the Act. As such, a failure to comply therewith may result in the termination of the business relationship.

### **(e) How We Address the Loss of Income that Results from Measures taken to Eliminate Forced and Child Labour**

We are committed to consistently improving performance indicators to measure the global impact of our policies with respect to reducing and eliminating the risk of forced and child labour. Through our developing pre-qualification processes, Miller will further strive to ensure that no supplier or subcontractor we work with is currently, or has ever, engaged in any form of modern slavery in their business. Future initiatives will build on our this pre-qualification processes to enhance transparency with respect to the impact of our policies, if any, including the loss of income that may result therefrom.

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**(f) Training Provided to Our Employees on Forced and Child Labour**

Forced and child labour is a consistent theme reflected in the Group's Ethics and Compliance Programs. The Group's Ethics and Compliance Programs and documentation is published on our intranet and at all times available to employees in several languages.

Our annual Ethics and Compliance training, delivered by our legal department, encompasses the requirement for strict compliance with the Code, and explicitly stipulates respect for persons as one of our key values. Respect for persons includes respect for human rights through compliance with the Principles of the UN Universal Declaration for Human Rights; the Fundamental Conventions of the International Labour Organization; and the Principles of the United Nations Global Compact.

As part of our intake process, new employees are required to complete the mandatory "Fair Play" module, a fundamental concept of which is to create an inclusive environment where individuals feel respected and are comfortable raising issues through our Whistleblowing Policy, including concerns pertaining to forced and child labour within our business and supply chain.

**(g) How We Assess the Effectiveness of our Programs in Preventing and Reducing the Risk of Forced and Child Labour within our Business**

We are committed to continually strengthening our review and risk assessment for the potential of forced and child labour within our organisation and supply chain. In this regard, we strive to monitor employee attendance and completion of all Ethics and Compliance training programs and to track supplier and contractor completion of our pre-qualification processes. We are diligent in investigating all alerts raised through our Whistleblowing policy, including effectively and efficiently responding to all concerns with respect to human rights violations within our business and supply chain. Our annual dialogue survey allows employees to anonymously and candidly comment on organizational performance, including with respect to promoting core values, ensuring diversity and inclusion, and overall satisfaction with remuneration. This allows us to productively direct our efforts and initiatives based on feedback results.

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

**I have the authority to bind MILLER PAVING LIMITED**

**Ryan Essex, President**

**May 22, 2024**