

ANNUAL REPORT

Introduction

Mainland Construction Materials ULC (“Mainland”) is committed to preventing the occurrence of forced labour and child labour in our operations and supply chains. We do not tolerate child labour, forced labour or any other form of slavery and we expect that our suppliers share our commitment to ethical and responsible business practices and support our values.

This report (the “Report”) has been prepared pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and outlines the actions we have taken during the year ended December 30, 2023 to prevent and reduce the risk of forced labour or child labour occurring in our business.

Our Structure and Business

Mainland Construction Materials ULC has business number BC1262454, is incorporated in British Columbia, Canada and has approximately 280 employees. It is an indirect wholly-owned subsidiary of Summit Materials, Inc. Summit Materials, Inc. is listed on the NYSE and does not have any presence or operations in Canada outside of its ownership of Mainland Construction Materials.

Our Supply Chains

Given the hyper-local nature of our business, limited imports to Canada and fact that the company only has employees in Canada, we view the risk profile for the occurrence of forced labor and child labor in our operations and supply chains as low.

All of our suppliers are either based in Canada or the United States: we have approximately 260 suppliers based in Canada and 25 suppliers based in the United States. Our suppliers supply construction related materials, wear items, construction mobile equipment, light duty vehicles, IT supplies and office supplies. We engage our suppliers on a short-term and long-term basis utilizing negotiated supply contracts and purchase orders.

Our senior management team oversees the supplier chains, and the employees buy from the suppliers as per guidelines set out by the senior team. The senior team consists of a President, 2 General Managers, 1 Shop Manager and 1 Equipment Manager.

Our Policies and Due Diligence Processes

Our Human Rights Policy, Code of Vendor Conduct and Code of Business Conduct and Ethics address matters relating to forced labour and child labour. They can be found here:

[Human Rights Policy Final Word \(summit-materials.com\)](https://www.summit-materials.com/human-rights-policy)

[Summit Materials Code of Vendor Conduct Final Word \(summit-materials.com\)](https://www.summit-materials.com/code-of-vendor-conduct)

[https://s1.g4cdn.com/947759825/files/doc_downloads/governance/2022/01/Summit-Code-of-Business-Conduct-and-Ethics-\(Updated-2021\).pdf](https://s1.g4cdn.com/947759825/files/doc_downloads/governance/2022/01/Summit-Code-of-Business-Conduct-and-Ethics-(Updated-2021).pdf)

Our due diligence processes involve embedding responsible business conduct into policies and management systems.

The Company’s Code of Business Conduct and Ethics applies to all of its officers, directors and employees, including its principal executive officer, principal financial officer and principal accounting officer, or persons performing similar functions and is posted on our website. Summit’s Code of Business Conduct and Ethics for employees addresses avoidance of conflicts of interest, protection of confidential information, compliance with applicable laws, rules and regulations, adherence to good disclosure practices, among other items. The Company’s Code of Business Conduct and Ethics is a “code of ethics,” as defined in Item 406(b) of Regulation S-K. The Company will make any legally required disclosures regarding amendments to, or waivers of, provisions of our Code of Business Conduct and Ethics available on the Company website. The Company’s EVP, Chief Legal Officer and Secretary is responsible for overseeing compliance with the Code and regularly reports to the Audit Committee on

the same. All fulltime employees are required to complete training related to our Code of Business Conduct and Ethics through Summit's internal Learning Management System.

Risks of Forced Labour and Child Labour in our Business and Supply Chains

Given the hyper-local nature of our business, limited imports to Canada and fact that the company only has employees in Canada, we have not identified any parts of our business and supply chains that carry a meaningful risk of forced labor or child labor being used.

Measures Taken to Remediate Forced or Child Labour

Not applicable, we have not identified any forced labor or child labor in our activities and supply chains. As such, no specific measures for remediation have been necessary.

Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families that Result from any Measures taken to Eliminate the Use of Forced or Child Labour in our Activities or Supply Chains

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labor or child labor in our activities and supply chains.

Employee Training

Mainland did not mandate formal training specifically addressing forced labor and child labor for its employees during 2023 given the low risk outlined above.

Measuring Our Effectiveness

Given the low risk outlined above, we do not currently have policies and procedures in place to assess our effectiveness in ensuring that forced labor and child labor are not being used in our activities and supply chains.

We comply with local and federal regulations in relation to onboarding of new employees.

Board approval

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Mainland Construction Materials ULC.

In my capacity as a Director of Mainland Construction Materials ULC, and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

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 the entity or entities 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.

DocuSigned by:



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Director

May 15, 2024

I have authority to bind Mainland Construction Materials ULC.