



**REPORT PURSUANT TO THE *FIGHTING AGAINST FORCED
LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT*
(FISCAL YEAR 2023)**

1. INTRODUCTION

This report is made jointly on behalf of Plan Group Inc. (“**PGI**”) and its subsidiary Gastier M.P. Inc. (“**Gastier**”, and collectively with PGI, the “**Company**”, “**We**” or “**Our**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for the financial year ending December 31, 2023 and describes the steps taken during the previous financial year to prevent and reduce the risk of forced labour or child labour being used in the production of goods or of goods imported into Canada by the Company.

The Company is built upon a culture of robustness and performance, which is underpinned by an individual and collective commitment to maintain the highest ethical standards at all times. We take a zero-tolerance approach to forced labor and child labour and our business is committed to ensuring that our supply chains are free from modern slavery, forced labor and child labour.

2. STRUCTURE, ACTIVITIES and SUPPLY CHAIN

PGI is Canadian business incorporated pursuant to the *Ontario Business Corporations Act* with approximately 400 office staff and 1200 unionized field staff. PGI primarily operates as a large-scale and mid-market electrical, mechanical, and technology contractor, as well as a provider of ongoing service and facilities management for clients across a broad spectrum of industries. While PGI operates Canada-wide, its head office is located at 2740 Steeles Ave. W., Concord, ON, L4K 4T4. PGI was acquired by Bouygues Energies & Services SAS in 2014.

Gastier is a Canadian business incorporated pursuant to the *Loi sur les sociétés par actions du Québec* with approximately 120 office staff and 500 unionized field staff. Gastier primarily operates in Quebec as a specialized electrical, instrumentation, piping and plumbing contractor with its head office located at 7825 Boulevard Henri-Bourassa E., Montreal, QC, H1E 1N9. Gastier was acquired by PGI in 2015.

As of 2023, PGI became a subsidiary of Equans S.A.S. (“**Equans**”), which itself is owned by Bouygues S.A. (“**Bouygues**”), both of which are, amongst other things, global diversified energy, services and construction companies headquartered in France.

As part of the services it offers its clients, the Company will build, maintain and service large commercial and public infrastructure buildings. The vast majority of the Company’s procurement efforts therefore relate to purchases of specialized equipment and material related to such projects. The majority of such equipment and materials are purchased from Canadian suppliers. From time to time, the Company will need to undertake limited importation activities, in which case the vast majority will be purchased from American suppliers, with less than 5% being imported from outside North America. These suppliers may have their own supply chains in overseas.

3. POLICIES and DUE DILIGENCE PROCESSES related to FORCED LABOUR AND CHILD LABOUR

The Company has a number of policies and procedures in place which are relevant to preventing instances of modern slavery, forced labour and child labour in its supply chains. These policies include:

- **Code of Ethics:** the Code of Ethics applies to every Company employee and requires them to comply with the principles of the United Nations Universal Declarations of Human Rights and the

fundamental conventions of the International Labour Organization, in particular, concerning forced and child labour and the principles of the United Nations Global Compact.

- **Corporate Social Responsibility Charter for Suppliers and Subcontractors:** the CSR Charter is a contractual requirement, setting out the obligations for the Company's suppliers to cascade the same obligations to their own suppliers. Suppliers are required to provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Suppliers are expressly forbidden from using forced or compulsory labour as well as engaging in child labour. Serious violations of the CSR Charter will lead to the termination of the business relationship.
- **Health and Safety Policy:** the policy sets out the Company's commitment and approach to ensuring it provides a healthy, safe working environment for its own staff and contractors that work on site.
- **Anti-Corruption Code of Conduct:** the Code of Conduct outlines the expectation that all Company employees will actively participate in safeguarding against corrupt practices, including but not limited to investigating and reporting any criminal activity of the Company's clients and suppliers.
- **Embargos and Export Restrictions Compliance Program:** the Program requires that the Company maintains compliance with international embargoes and export restrictions. This underscores the Company's commitment to ensure its suppliers are not operating in an area which may be at greater risk of utilizing modern slavery practices.

The Company policies referenced above are provided to all employees upon beginning employment with the Company, and are otherwise available on either PGI or Gastier's internal intranet sites. Relevant policies are provided to suppliers during the procurement process.

In addition, each supplier of the Company is assessed before a contractual relationship is entered into. The level of assessment is commensurate with the supplier, their geographic location and their sector of activity. To the extent further investigation is required, the Company may retain the services of an independent third-party to perform an in-depth assessment. The Company's procurement departments otherwise continuously monitors the performance of their supply chains and will act promptly if it becomes aware of an increased risk of a supplier utilizing modern slavery.

The Company also requires that each of its suppliers contractually commit to comply with the Company's various policies including the Code of Ethics and the CSR Charter, which ensures that our suppliers support us in adhering to our high ethical standards.

The Company maintains a whistleblower platform whereby employees may anonymously report various ethical incidents or concerns, including any issues related to modern slavery, forced labour and child labour. The Company otherwise maintains a culture such that an employee faced with such an issue may openly and freely communicate the same to their line manager, human resources, or the local Ethics Officer.

4. TRAINING

Other than requiring all Company employees to review the policies as outlined above, we do not currently require employees to undergo mandatory training related to modern slavery, forced labour and child labour. However, we are currently exploring options for formal training programs and engagement practices, which may include training and targeted engagement on the topics of modern slavery, forced labour and child labour.

5. THE RISK OF FORCED LABOUR and CHILD LABOUR in our BUSINESS and SUPPLY CHAINS

The Company believes that there is low risk for its supply chain to be exposed to forced or child labour.

The vast majority of the Company's suppliers are located in Canada and are Canadian companies with which either PGI or Gastier has a long-standing and ongoing business relationship. A small number of suppliers are located outside of Canada (including the United States and China), for which the Company remains vigilant in assessing the level of risk that such suppliers pose in utilizing modern slavery, forced labour or child labour.

Moreover, the specialized nature of the equipment, parts and materials that the Company orders from suppliers are such that we consider there to be inherently low risk that such suppliers utilized forced or child labour to manufacture these goods.

6. REMEDIATION MEASURES

At this time, the Company has not identified instances of forced or child labour in its activities or supply chains in the previous financial year. As such, no remediation measures, including provisions for loss of income for vulnerable families, have been taken to date.

7. ORGANIZATION ASSESSMENT of EFFECTIVENESS of POLICIES RELATED to FORCED LABOUR and CHILD LABOUR

While the Company does not have a formal process in place for measuring its effectiveness, we continually monitor and remain committed to developing our policies, practices and procedures to ensure that any instance of modern slavery, forced labor and child labour within its supply chain is identified, investigated and resolved. While we recognize that it is not determinative, the Company has not learned or otherwise become aware of an issue of modern slavery, forced labour or child labour within its supply chain to date. We will continue to monitor and review our suppliers and our supply chain to identify any potential risks, and appropriate investigations and assessments will be conducted specific to a relevant concern.

8. APPROVAL & ATTESTATION

This report has been approved by the Board of Directors of Plan Group Inc. for the financial year ending December 31, 2023.

In accordance with the requirements of the Act, this report is approved and attested as required under subsection 11(4)(b)(ii) and subsection 11(5) of the Act.



Paul Sheridan
Chief Executive Officer
Plan Group Inc.
May 31, 2024
I have the authority to bind Plan Group Inc.



Eric Delehaye
Chief Executive Officer
Gastier M.P. Inc.
May 31, 2024
I have the authority to bind Gastier M.P. Inc.