

2023 Report  
on Fighting Against Forced Labour and Child Labour  
in Supply Chain

Prepared by  
RED RIVER SOLUTIONS GP  
in respect of the

North End Sewage Treatment Plant (NEWPCC) Upgrade  
Headworks Facilities

May 2024

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## I. STATEMENT DEVELOPMENT AND APPROVAL SUMMARY

Red River Solutions GP, (“RRS” or the “Entity”) has prepared this Modern Slavery Report on Fighting Against Forced Labour and Child Labour in Supply Chain (the “Report”) covering the period of **January 1, 2023, to December 31, 2023**, in respect of the North End Sewage Treatment Plant (NEWPCC) Upgrade Headworks Facilities (the “Project”) for the partners of the General Partnership. The Report is made pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”).

The Report is the product of consultations within relevant RRS Constructors departments, including Legal, Human Resources, Finance, Procurement, Quality, Health, Safety and Environmental.

This Report has been reviewed and was approved on May 31st, 2024 by the RRS Executive Committee.

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 on behalf of RRS. To the best of my knowledge and belief, 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.

For clarity, I have provided the attestation above in my capacity as a project director and not in my personal capacity.

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Robert Black  
Deputy Project Director  
**Red River Solutions GP**  
May 31, 2024

I have authority to bind the general partnership.

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Gerry Kyne  
Project Director  
**Red River Solutions GP**  
May 31, 2024

I have authority to bind the general partnership.

## II. INFORMATION ADDRESSING THE REQUIREMENTS OF SUBSECTION 11(3) OF THE ACT

### A. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

#### 1. STRUCTURE

Red River Solutions is a general partnership created on June 11, 2021, by the following two entities:

- Oscar Renda Contracting of Canada Inc. (“**Oscar Renda**”), a company duly constituted and existing under the laws of British Columbia, having its registered office at 1100 Kubota Dr. Grapevine, TX 76051; and,
- Aecon Water Infrastructure Inc. (“**AWII**” or the “**Managing Party**”), a company duly constituted and existing under the laws of Canada, having an office at 20 Carlson Court, Suite 100, Toronto, Ontario, M9W 7K6.

The Entity was formed as a special purpose vehicle to provide design and construction services to the City of Winnipeg (“**the City**”) project for the North End Sewage Treatment Plant (NEWPCC) Upgrade Headworks Facilities (the “**Project**”). The Project is located in Winnipeg, Manitoba, and the Entity does not have any material business activities outside of Manitoba. The Entity’s activities relate principally to those connected to the Project.

RRS staff is mainly comprised of employees of AWII or Oscar Renda that have been seconded to the Project. RRS, through an affiliated subcontracting entity, also has a craft workforce of over 90 employees on the Project. Many of the staff and all the craft are based at the RRS Project site.

#### 2. ACTIVITIES

The Project is a design and construction of the upgrade of the North End Water Pollution Control Centre (NEWPCC) project to accommodate future wastewater flows and loadings to the plant and to provide enhanced treatment capability to address environmental and public health concerns and regulatory requirements. The upgraded project will biologically remove, recover, and reuse nutrients from the wastewater with minimal chemical use. The upgrade project provides treatment during peak raw sewage flow events and complies with the Environment Act License No. 2684 RRR requirements.

The following is a listing of the activities/facilities being constructed as a part of the Project works:

- Raw Sewage Pumping
- H1 & Y5 Interceptor Junction Chambers
- Screening Facility
- Grit Removal Facility
- Solids Handling Area
- Fuel Storage and Standby Power Generation Facility

#### 3. SUPPLY CHAIN

As of April 2024, RRS has engaged close to 260 domestic and international suppliers for the Project. RRS procures most of the products, services, raw materials and finished products from vendors and

subcontractors based in Canada except some specialized materials also being procured from America, and some European countries such as Germany. This includes sourcing direct and indirect manpower for project works, and engineering services for the construction of the project. These vendors and subcontractors source their materials and products from North American markets when available and source raw materials, such as steel, from the international market such as Asia.

The Entity relies on the Managing Party to provide support services including the review and administration of all new supplier setups by a centralized corporate vendor master team. A copy of the Managing Party report pursuant to the Act is available from its parent company’s website: <https://www.aecon.com/resources> (the “Managing Party Report”).

## **B. POLICIES AND DUE DILIGENCE PROCESSES AND COMPLIANCE**

### **Policies**

RRS has maintained a business commitment with the different individuals or entities it interacts with, and its primarily seconded employees based on ethical principles of their employer’s policies. These policies guide the functioning of RRS and form a part of the shared corporate culture of the constituent partner corporations. The respective partners’ policies are available on their parent company websites. The Entity does not have any separate internal policies or procedures relating to forced or child labour.

The policies and codes of RRS’ partner’s parent companies are periodically monitored and reviewed to ensure their effectiveness and continuous improvement. This flows through and RRS is committed to acting ethically and with integrity in all our business relationships, and we expect the same high standards from all our subcontractors, suppliers, and other business partners.

### **Procurement and Supply Chain Due Diligence**

As described above, the Entity relies on the Managing Party for matters relating to procurement and subcontracting. Accordingly, the Entity does not have any separate due diligence processes relating to forced or child labour. Please refer to the Managing Party Report for more information.

A signed standard form of contract is used to ensure that the supplier, vendors and subcontractor conform to a supplier code of conduct that requires such contractors to uphold ethical business and labour practices of RRS and to comply with applicable law. AWII uses the International Suppliers Network (ISNet) to establish the trustworthy status and compliance with workplace policies and procedures of new vendors.

The policies and procedures of the Managing Party ensures that RRS maintains a reliable and trusted supply chain and proactively identifies and manages risks throughout each contract term, including compliances.

## **C. RISK ASSESSMENT AND MITIGATING ACTIONS**

As described above, RRS relies on the Managing Party for matters relating to procurement and subcontracting. Accordingly, RRS has not undertaken a separate analysis to assess the risk of the use of forced or child labour in its business activities and supply chains.

To date, instances of modern slavery, forced or child labour have not been identified in its supply chain.

#### **D. REMEDIATION MEASURES**

RRS encourages a culture of open communication among our employees, subcontractors, suppliers, partners and third parties to report any potentially unethical or illegal practices, particularly those involving human rights.

As noted above, the Entity relies on the Managing Party for matters relating to procurement and subcontracting. Based on the information made available, RRS has not identified instances of forced or child labour in our activities or supply chain. Therefore, no remediation measures have been taken to date.

#### **E. REMEDIATION OF LOSS OF INCOME**

Similarly, the Entity is not currently aware of any instance a loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

#### **F. TRAINING**

All the employees are committed to adhering to policies and principles (such as the Code of Ethics and Business Conduct and the Environmental, Health and Safety Manual etc.) of their respective parent companies. The Entity does not have a separate training program but relies on the parent companies' programs to identify and meet such requirements and conduct annual training of these policies.

#### **G. ASSESSING EFFECTIVENESS**

Given that the Entity is a special purpose vehicle that is expected to carry on business for a limited period of time, and since the activities of the Entity are guided by the policies and procedures of the parent companies, RRS has not established a formal process for measuring the effectiveness of mitigation and prevention of the use of forced or child labour in its business activities and supply chains..

#### **H. STEPS TAKEN IN THE PREVIOUS YEAR**

As described above, the Entity relies on the Managing Party for matters relating to procurement and subcontracting. Accordingly, the Entity has not taken any separate steps in the previous year in this regard.

### **III. CONCLUSION**

RRS is committed to preventing forced labour or child labour from taking place on our Project and in our supply chain. The partners will continue to review our policies, procedures, and practices periodically to determine any enhancements we can make to help prevent forced labour or child labour.