

Veolia Water Technologies and Solutions Canada GP

***Report on Fighting Against Forced Labour and
Child Labour for 2023***

FINANCIAL YEAR ENDED DECEMBER 31, 2023

Introduction

This report (the “**Report**”) has been prepared by Veolia Water Technologies and Solutions Canada GP (“**VWTS**” or the “**Company**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”).

The Report constitutes the first report prepared by VWTS pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) and sets out the steps it has taken to prevent and reduce the risk that forced labour or child labour (“**Forced Labour**”) is used at any step of the production, importation or distribution of goods.

I. Structure, Activities and Supply Chains

1.1 Structure

VWTS is a water solutions partnership headquartered in Oakville, Ontario and is registered under the Ontario *Partnerships Act*. As at December 31, 2023, the Company employed approximately 1,047 employees across Canada.

VWTS is a subsidiary of Veolia Water Technologies (France) and is ultimately owned by Veolia Environnement S.A (“**Veolia**”; collectively with its subsidiaries “**the Veolia Group**”). Veolia is a multinational company headquartered in France that serves as a global leader in environmental and optimized resource management. With over 200,000 employees worldwide, Veolia Group designs and provides water, waste and energy management solutions which contribute to the sustainable development of industries and communities.

1.2 Activities

VWTS specializes in sustainable water and wastewater treatment solutions for industrial customers and public authorities. The Company’s core activities include the provision of:

- Industrial water solutions for the food and beverage, pulp and paper, power and other industries.
- Industrial water solutions for mining companies.
- Mobile water solutions
- Hydrex® chemical solutions

1.3 Supply Chains

VWTS' principal services include the production and delivery of municipal and industrial water and wastewater solutions and technologies.

The Company imports parts and components required for the manufacture of water treatment equipment, as well as chemical components for chemical solutions for water treatment. These parts and components are imported predominantly from manufacturers in the United States.

II. Steps to Prevent and Reduce Forced Labour Risks

In general terms, during the financial year ending December 31, 2023, VWTS took the following steps to prevent and reduce the risk of Forced Labour in its activities and supply chains:

- **Internal Policies:** the Company continued to implement Veolia's ethical and human rights policies, which expressly prohibit the use of Forced Labour in the Veolia Group's operations.
- **Supplier Compliance:** the Company continued to require all suppliers to abide by its General Principle of Suppliers Relationship, which requires all suppliers to enforce anti-Forced Labour policies and to agree to monitoring at the Company's discretion.
- **Whistleblower Mechanisms:** All VWTS employees and collaborators benefit from a whistleblowing mechanism that allows for anonymous reporting about suspected breaches of the Veolia Group's values and policies.
- **Training:** training sessions were provided to employees on company policies, including those against Forced Labour.

Further details on the above steps are set below.

III. Policies and Due Diligence Processes

1. Policies

Veolia has established a range of policies and procedures to promote integrity and corporate responsibility in its business activities. These policies and procedures are adopted and implemented throughout the Veolia Group, including by VWTS.

The Veolia Group's policies on labour rights issues, including its response to global risks of Forced Labour, has been developed from international labour and human rights standards, including those established by the United Nations, the International Labour Organization and the Organisation for Economic Co-operation and Development. These policies and procedures extend to VWTS, as a member of the Veolia Group, and represent some of the most important and foundational expectations the Company has for its employees, business partners and suppliers.

The key policies that supported VWTS approach to the management of Forced Labour risks in 2023 were as follows:

(i) Human Rights Policy

Veolia's Human Rights Policy outlines its commitment to respecting and promoting human rights in its activities and relations with stakeholders. The policy is inspired from international human rights reference texts, including:

- The (ILO) International Labour Organization's [Declaration on Fundamental Principles and Rights at Work](#).
- The United Nation's [Universal Declaration of Human Rights](#) and its international covenants on [Civil and Political Rights](#) and [Economic, Social and Cultural Rights](#).
- The OECD (Organization for Economic Co-operation and Development) [Guidelines for Multinational Enterprises](#); and
- The United Nations' [Guiding Principles on Business and Human Rights](#).

Veolia is also a proud member of the United Nations Global Compact (the "UN Compact") since 2003. As such, all members of the Veolia Group, including VWTS, are required under the Human Rights Policy to commit to the [Ten Principles of the UN Global Compact](#). These principles expressly include (i) the elimination of all forms of forced and compulsory labour and (ii) the effective abolition of child labour. Veolia's Human Rights Policy has expressly adopted these principles, providing that the elimination of forced labour, compulsory labour and child labour is considered a priority issue for the Veolia Group.

(ii) Ethics Guide

The Ethics Guide sets out fundamental ethical standards that Veolia Group employees, at all levels and in all countries, must abide by.

The Ethics Guide requires Veolia Group members to evaluate suppliers and services providers in accordance with objective criteria in compliance with applicable laws. These criteria are based on suppliers' performance, as well as on their observance of the ethical and sustainable development rules adopted by the Group. The core values stressed in the supplier relations charter, which govern the choice of suppliers, include the prohibition of forced labour and child labour.

(iii) General Principle for Suppliers Relationship

The General Principle for Suppliers Relationship ("**Supplier Principles**") sets out the principles the Veolia Group expects its suppliers and subcontractors to comply with as part of its procurement policy and commitment to corporate social responsibility. Suppliers and subcontractors are expected to adhere to Veolia Group's values with respect to human rights, anti-corruption, competition, health and safety and environmental concerns.

The Supplier Principles details Veolia Group's strict prohibition against the use of Forced Labour of all kinds, including servitude, trafficking, slavery, or the retention of migrants or illegal workers by unlawful means. All supplier employees must be employed voluntarily in exchange for legal compensation and without any exposure to threats or the suppression of their rights.

Suppliers are required to commit to Veolia's prohibition against Forced Labour contractually and must also acknowledge that they may be subject to routine monitoring by Veolia, as required.

2. Due Diligence Processes

During the 2023 financial year, VWTS relied on the following due diligence processes to reduce the risks of Forced Labour being used in its supply chains:

- **Supplier Contracts:** suppliers are required to contractually verify their compliance with applicable laws and regulations, including prohibitions against Forced Labour, and confirm their ability to run responsible operations. Suppliers are required to pass on and enforce such standards on all subcontractors.
- **Supplier Evaluations:** As part of VWTS' due diligence processes, suppliers are evaluated with the EcoVadis program, a globally recognized assessment platform for identifying risks and tracking labour performance across supply chains. Prospective and current business partners and suppliers are evaluated on four categories, including labour and human rights compliance.

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- **Auditing:** Suppliers are required to agree to be subject to on-site or remote audits at the Company's discretion.
- **Whistleblowing Mechanism:** Pursuant to Veolia's Whistleblowing Charter, Veolia Group employees and third parties are encouraged to report any ethical concerns they may have about breaches of the Group's values. Individuals may report ethical concerns anonymously by using a digital platform called Whispli, or by directly contacting the Ethics Committee by telephone or email.

IV. Forced Labour Risks

VWTS recognizes that no sector or industry involving the production or importation of goods is assumed to be entirely free of risks and that certain parts of its business or supply chains may carry risks of Forced Labour.

During the Reporting Period, no specific measures were taken to assess which particular aspects of VWTS' business or supply chains may carry such risks. The foregoing assessment will occur during the next reporting period.

During the reporting period, VWTS relied on the policies, due diligence processes and reporting channels presented in this Report to address any human rights concerns.

V. Remediation Measures

For the financial year ending December 31, 2023, VWTS has not discovered any situations of Forced Labour in its workplaces and supply chains. There has therefore been no specific need to remediate any adverse impacts of Forced Labour.

Similarly, no loss of income to vulnerable families has resulted from the remediation of Forced Labour, since no such measures took place. Accordingly, no actions to remediate the lost income of vulnerable families have been warranted.

Should VWTS identify future incidents of Forced Labour in its supply chains, it will consider appropriate remediation strategies in line with industry best practices.

VI. Training

VWTS believes that training is important for raising awareness within the organization and building employee capabilities to mitigate risks and appropriately escalate concerns.

The Company offers the Fair Employment training module, which informs employees of their obligation to observe Veolia Group's core values and all applicable employment laws

(including the prohibitions against forced labour, child labour and human trafficking) as well as the legal and dispensary consequences of a failure to comply.

Employees are expressly encouraged to report any human rights concerns they may have, whether internal or external, and are provided with information on several methods of reporting such concerns. Reports can be made directly to the employee's manager, HR, the ombuds leader of their group or anonymously through the Ethics Portal.

VII. Assessing effectiveness

As detailed above, VWTS has several measures in place to reduce the risk that Forced Labour is used in its activities and supply chains.

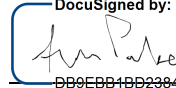
While VWTS has not yet taken any actions to assess the effectiveness of those actions, the Company intends to assess its effectiveness in preventing and reducing risks of Forced Labour and in its activities at a later stage.

VIII. Approval

This report was approved by the partners of VWTS.

In accordance with the requirements of the Act, and in particular section 11 thereof, the undersigned attests that they have reviewed the information contained in the report for the entities listed above. Based on our knowledge, and having exercised reasonable diligence, the undersigned 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 VWTS.

DocuSigned by:

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Name: Andrew Parke

Title: President