



## **2023 VolkerWessels Canada Ltd. Modern Slavery Report**

VolkerWessels Canada Ltd. ("we", "our", "Volker Stevin Canada" or the "Corporation") has created this report to meet our requirements pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Modern Slavery Act**").

Forced labour and child labour (each as defined in the Modern Slavery Act and hereinafter together referred to as "**modern slavery**") are violations of fundamental human rights and are occurring across the globe. As a Canadian construction and highway maintenance company, we recognize the responsibility we have to ensure our operations and the supply chains that support our operations adhere to the highest ethical standards, which includes no use of modern slavery in our business or supply chains.

The Corporation is subject to the reporting requirements of the Modern Slavery Act. This report covers the Corporation's activities and the activities of our subsidiaries during our previous financial year, being from January 1, 2023 to December 31, 2023.

The Corporation takes modern slavery and our reporting requirements very seriously and we are committed to ensuring that we adhere to such requirements. We will continue to evaluate and assess our processes with respect to modern slavery in our business over time to ensure we are meeting all applicable reporting requirements and other legislation relating to modern slavery.

### **Steps Taken During 2023**

The Corporation first became aware of the Modern Slavery Act in early 2024 after it came into force and subsequently engaged our legal counsel to assist in navigating the new reporting regime. As a result of the timing of becoming aware of the new reporting requirements, we did not take any steps in 2023 in relation to reducing the risks of modern slavery occurring in the Corporation's supply chain; however, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain. We intend to continue to evaluate our reporting processes to ensure that our reporting with respect to modern slavery meets the statutory requirements.

### **Structure, Activities and Supply Chains**

- **Structure & Operations:** The Corporation, operating as Volker Stevin Canada, is a group of companies providing years of experience and service in the areas of construction, highway maintenance, civil works and bridge construction, maintenance and rehabilitation expertise and project management. By maintaining our high standards, we ensure the longevity, sustainability and profitability of the Corporation. From the hiring process to project completion, every detail matters.

Our comprehensive safety protocols, commitment to maintaining low employee attrition rates, and relationships with the communities within which we work, all play a role in what we do.

Our dynamic and diverse culture welcomes people that are dedicated and highly skilled with a proven foundation built on mutual respect. Bringing individual and unique skills, each person at Volker Stevin Canada is an essential contributor in achieving our common goals both locally, nationally and at the international level. Above all, we focus on continuously achieving superior standards in order to meet, and exceed, both employee and client objectives while engaging in a culture of safety excellence, environmental responsibility, and a great work environment.

In pursuit of building and maintaining lasting and successful relationships, the Corporation employs a culture of continuous improvement by aligning with and supporting all stakeholder goals and ambitions.

The Corporation manages its seven wholly owned subsidiary companies:

- Volker Stevin Contracting Ltd.
  - Volker Stevin Highways Ltd.
  - H. Wilson Industries (2010) Ltd.
  - McNally Contractors (2011) Ltd.
  - Mainline Construction (2014) Ltd.
  - Lakes District Maintenance Inc.
  - 0800230 B.C. Ltd.
- **Supply chains:** We procure goods primarily from Canadian suppliers, with a small number of suppliers being located in the United States. Procurement is managed by each subsidiary company due to key relationships with suppliers in geographically disparate markets. Our construction companies procure the necessary goods and materials including concrete, steel, fuel and equipment, as well as other construction materials. Our highway maintenance companies procure equipment, sand/aggregate, fuel and other supplies typically used in maintenance activities.

The Corporation engages subcontractors on some construction projects, resulting in indirect procurement of goods. All subcontractors are Canadian companies, which are subject to Canadian laws and regulations.

## **Policies and Due Diligence**

### ***Policies***

The Corporation has several policies in place that reflect our values and set clear expectations for our directors, officers, employees, suppliers, contractors, consultants, agents, business partners, and other service providers with whom we engage.

Below, we have provided an overview of the relevant policies that we currently have in place:

- **Code of Conduct:** The Code of Conduct (the "**Code**") is intended to guide us and provide clarity on what is expected. Like our company culture, the spirit of the Code is down-to-earth, entrepreneurial, and responsible. The main purpose of the Code is to provide practical guidelines to assist us in carrying out daily work activities and dealings with others within appropriate legal and ethical standards. The Code does not contemplate every situation that might arise, rather, it identifies guiding principles to help in making decisions consistent with the Corporation's values and reputation.

The Code specifically addresses employment practices with a commitment to treat all employees lawfully, fairly, ethically, respectfully, and with dignity. Employee culture is also addressed, recognizing that the success of the Corporation stands or falls with the involvement of our employees. All employees have the responsibility to play their part in creating a corporate culture of openness, fairness and integrity.

- **Whistleblower Policy:** our Trust Line is a confidential and anonymous reporting system available by phone or web-based reporting through Integrity Counts. The Trust Line is available to anyone, including, but not limited to all employees, contractors or consultants of the Corporation, made available on our intranet and physical postings in all of our offices. The Trust Line captures a broad range of reporting whether it be financial, unfair business practices, safety, or other. The identity of the reporter is completely protected.

In addition to the above, we intend to regularly evaluate our approach with respect to modern slavery to ensure the effectiveness of our methodology, including amending existing policies and implementing new policies, as necessary, to mitigate the risks of modern slavery from occurring in our business or operations to the extent determined necessary.

### ***Due Diligence***

Given the timing of the implementation of the Modern Slavery Act, the Corporation has not historically undertaken any steps to conduct due diligence relating to mitigating the risks of modern slavery occurring in relation to our business or operations; however, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain. We may in the future consider implementing additional procedures to ensure we are not unknowingly engaged in business with any entities involved in modern slavery.

### **Activity and Supply Chain Risks**

The Corporation is not aware of any high-risk exposure to modern slavery associated with the Corporation's business or supply chains.

### **Remediation Measures**

We are not aware of the existence of modern slavery in our business and the supply chains that support our operations and as such, we have not taken any measures to remediate any forced labour or child labour or to remediate the loss of income to the most vulnerable families that resulted from any measure taken from any of the Corporation's actions.

### **Employee Training**

The Corporation advised all employees of the new reporting requirements under the Modern Slavery Act via email communication in early 2024.

The Chief Financial Officer, as a compliance officer, regularly brings elements of the Code of Conduct to the attention of all employees. The Code is also available on our intranet, accessible by all employees. The most recent communication regarding the Code was in October 2023.

### **Assessment of Effectiveness**

The Corporation has not yet implemented any policies or processes to assess our effectiveness in ensuring that modern slavery is not used in the Corporation's business or supply chains.

### **Approval and Attestation of the Report**

This report was approved by the Corporation's Board of Directors in respect of the Corporation and its subsidiaries on May 31, 2024 pursuant to paragraph 11(4)(b)(ii) of the Modern Slavery Act and will be filed with the Minister of Public Safety and Emergency Preparedness.

In accordance with the requirements of the Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest, on behalf of the Corporation, and with no personal liability, that the information in this report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.

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Fred Desjarlais  
Chief Executive Officer  
May 31, 2024

I have the authority to bind the Corporation.