

**WESTEND CONNECTORS DEVELOPER GENERAL PARTNERSHIP**  
**(Partners and Participating Entities: Aecon Westend Connectors GP Inc.; Dragados Westend Connectors GP Inc.; GI&P Westend Connectors GP Inc.; Westend Connectors Construction General Partnership; ATECWE Labour Company Inc.)**

**Report Pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act***

**1. Introduction**

This report is being issued by **WESTEND CONNECTORS DEVELOPER GENERAL PARTNERSHIP** ( the “**Entity**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for its most recent financial year ended on December 31, 2024.

Operating our business ethically and with clear values, ensures that we are a responsible employer. Our core values are safety, accountability, integrity and inclusion. We are firmly against human rights abuses and hold a strong position against forced labour and child labour, adhering to global concerns over these practices.

**2. Reporting as required by the Act**

We are mindful of the importance of our employees, our stakeholders and our impact on the community we operate amongst and dedicated to protecting employees, clients, subcontractors and partners from any form of modern slavery by promoting their wellness through our actions and the application of our core values.

This report is our second pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and it summarizes the steps our partnership has undertaken to prevent and reduce the risk of forced labour or child labour in our activities and supply chain. It covers the reporting period from January 1, 2024, to December 31, 2024.

**3. Structure, Activities and Supply Chains**

***Structure and Activities***

The Entity is a general partnership existing under the laws of Ontario. The partners are: AECON WESTEND CONNECTORS GP INC.; DRAGADOS WESTEND CONNECTORS GP INC.; GI&P WESTEND CONNECTORS GP INC. (each a “**Partner**”, and collectively the “**Partners**”)

The Entity was formed as a special purpose vehicle in order to design, construct and finance an advanced tunnel for the underground portion of the alignment for the light rail transit (LRT) between Scarlett Road and Renforth Gateway and other associated structures required for the Eglinton Crosstown West Extension (the “**Project**”). Such tunneling Project is located along Eglinton Avenue in both the cities of Mississauga and Etobicoke, province of Ontario, and the Entity does not have any material business activities outside of Ontario. The Entity’s activities relate principally to those connected to the Project, and other activities that are ancillary to that purpose. Those activities include the importation of goods into Canada to be used in the development and construction of the Project.

## ***Supply Chain***

The Entity's supply chain process for both procurement and subcontracting, is run at Project level by the Entity's procurement department and the operational units' leads using best practices and requirements of the Partners. Requirements are approved by the Partners' representatives in advance of the placement of orders and executing of subcontract agreements.

## ***Procurement***

While the direct and indirect procurement of goods, materials and services is conducted primarily with Canadian suppliers, the manufacture of certain products, and procurement of certain goods and services, may take place outside of Canada. All of our major subcontractors and suppliers from outside Canada are based in Europe and the United States.

Taking the greatest possible advantage of each Partner's supply chain networks and success experiences, most requirements are covered through the engagement of suppliers who are already included in the Partners' approved vendors lists, The Entity relies on Aecon Group Inc. ("Aecon"), the ultimate parent of its partner Aecon Westend Connectors GP Inc., for matters relating to procurement and subcontracting. Accordingly, the Entity does not have further visibility into its supply chain or procurement practices and relies on those of Aecon. Please see Aecon's report pursuant to the Act available here for further details:

[AECON Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act \(aeconcomfiles.blob.core.windows.net\)](http://aeconcomfiles.blob.core.windows.net)

New supplier setups are requested by the Project procurement team and administered by one of the Partners' vendor master team (Aecon).

In order to be an approved supplier to the Entity, suppliers must:

- complete a pre-qualification questionnaire designed to understand the prospective suppliers' policies and processes for identifying and prohibiting the use of forced and child labour. Responses are reviewed by a centralized vendor master team that determines if a third-party open-source investigation is required.
- Comply strictly with Canadian laws.
- Adhere with the Human Rights principles set out in all Partners' Code of Conduct.

Goods and materials directly procured by the Entity include structural steel, reinforcement steel, concrete, aggregates, fuel, electrical and mechanical equipment, industrial consumables and other construction materials. This Project also requires the procurement or rental of specialized construction and tunneling equipment. Directly procured services may include design services, hydro-vac excavation, crane services, engineering and installation and re-certification of scaffolding.

## ***Use of Subcontractors***

The Project involves the use of subcontractors. The work performed by subcontractors may include the supply of goods or materials, as well as installation utilizing the subcontractor's labour. The labour and material components of subcontracted work vary depending on the scope of the work and trade. All

subcontractors working on this Project are on the pre-approved vendor list from Aecon that it is what all three Partners follow for this Job.

Aside from their portfolio and experience, the candidate subcontractors must meet the same principles as the suppliers in terms of Human Rights and adherence to the Partners' policies as per below:

- complete a pre-qualification questionnaire designed to understand the prospective suppliers' policies and processes for identifying and prohibiting the use of forced and child labour. Responses are reviewed by a centralized vendor master team that determines if a third-party open-source investigation is required.
- Comply strictly with Canadian laws.
- Adhere with the Human Rights principles set out in all Partners' Code of Conduct.

#### **4. Policies and Due Diligence Processes Relating to Forced and Child Labour**

While the Entity does not have any separate policies relating to forced or child labour, the policies of each Partner, including those related with forced labour and child labour, have been developed to ensure activities are carried out in a responsible manner and are reviewed and updated regularly. Link to those policies are provided below this document.

The Partners share the same values and respect of human rights, as it can be appreciated reading through each Partner's policies displayed on the Partners' websites. As a result, the Entity strives to do business with organizations and individuals who conduct themselves in the same way.

Due diligence processes are those applied by Aecon and its vendor master team when administering the onboarding process of new vendors for the Entity.

#### ***Key Policies and Documents of Partners***

Key policies related with ethics, codes of conduct and whistleblowing programs, that apply to the Entity, may be found at the following Partners' web links:

[http://www.aecon.com/About\\_Us/Vision\\_44\\_Mission\\_44\\_Values/Supplier\\_Code\\_of\\_Conduct\\_July\\_2016.pdf](http://www.aecon.com/About_Us/Vision_44_Mission_44_Values/Supplier_Code_of_Conduct_July_2016.pdf) ,

[https://secure.ethicspoint.com/domain/media/en/gui/74584/code\\_canada.pdf](https://secure.ethicspoint.com/domain/media/en/gui/74584/code_canada.pdf), and

<https://www.ghella.com/en/ethics-and-compliance>;

#### **5. Risk Assessment and Mitigating Actions**

The Entity's operations, and the majority of its procurement and supply chain, are located in Canada, and therefore are at low risk for forced labour and child labour due to the legal frameworks mandated both at the federal and provincial levels and a commitment to implementing those laws.

During the fiscal year covered by this report over an estimated 95% of the Entity's spend was with Canadian entities. The remaining estimated 5 % was spent with suppliers in the following countries: United

States of America, France, Spain, Italy and United Kingdom, which have similar business practices and laws to Canada.

The Entity relies primarily on suppliers and subcontractors that have been previously vetted and approved by the Partners and are included on a Partners' approved vendors list. The Entity 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. For the same reason, the Entity does not have any separate internal policies or procedures relating to the assessment or management of these risks.

Goods and services sourced outside of Canada include steel products, specialized construction equipment, instrumentation, lubricants, design services and consulting services.

## **6. Steps taken in the previous year to prevent and reduce risks of forced labour and child labour**

Other than the measures outlined in this report and the Entity's reliance on its Partners' efforts with respect to certain procurement and subcontracting matters, the Entity has not taken any separate steps in the previous year in this regard.

## **7. Remediation Measures**

At this time, the Entity is not aware of any instances of forced or child labour in its activities or supply chains. As a consequence, the Entity has taken no remediation measures to date. Similarly, The Entity is not currently aware of any instance where its efforts to prevent the use of forced or child labour in its business activities or supply chains contributed to a loss of income for vulnerable families.

## **8. Remediation of Loss of Income**

The Entity is not currently aware of any instance where its efforts to prevent and reduce the risk of forced or child labour in its activities or supply chains contributed to a loss of income for vulnerable families.

## **9. Training to Employees on Forced Labour and Child Labour**

The Entity, or its partner and/or affiliated entities, do not conduct training activities of this sort at this time.

## **10. Assessment of effectiveness of steps taken**

Given that the Entity is a special purpose vehicle that is expected to carry on business for a limited period of time, it 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 other than a periodic review of our activities, suppliers and supply chain.

## **11. Forward-looking information**


The information in this report includes certain forward-looking statements which may constitute forward-looking information under applicable security laws. These forward-looking statements are based on currently available information and operating plans but are subject to risk and uncertainties. Forward-

looking statements may include, without limitation, statements regarding the operations of the business, the addressing of future complex challenges (including the imperative to rapidly advance the energy transition), the Entity's human rights commitments, statements regarding suppliers, vendors or contractors continued compliance with the Partners' policies and the Entity's contract terms, the Entity's ability to meet its proposed objectives and next steps, the Entity's ability to effectively measure the effectiveness of its mitigation and prevention efforts. Forward-looking statements may in some cases be identified as words such as "may", "will", "expects", "target", "future", "plans", "believes", "anticipates", "estimates", "potential", "seek", "projects", "intends", "should" or the negative of these terms, or similar expressions. In addition to events beyond the Entity's control, there are factors which could cause actual or future results, performance or achievements to differ materially from those expressed or inferred herein including, but not limited to: the risk of receiving untruthful or inaccurate responses or information from suppliers, the risk of changes in the Entity's supply chain due to project requirements or the availability of materials, goods and services. These forward-looking statements are based on a variety of factors and assumptions including, but not limited to that: there are no unforeseen changes to economic and market conditions, and no significant events occur outside the ordinary course of business. These assumptions are based on information currently available to the Entity. Except as required by applicable securities laws, forward-looking statements speak only as for the date on which they are made and the Entity undertakes no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events or otherwise.

## 12. APPROVAL AND ATTESTATION

This report was approved by Jaime Martin-Cermeno, Director on behalf of the Entity pursuant to section 11(4)(b)(i) 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.

For clarity, I have provided the attestation above in my capacity as a director of Westend Connectors Developer General Partnership and not in my personal capacity.



Name: Jaime Martin-Cermeno

Title: Director, WestEnd Connectors Developer General Partnership (ProjectCo Representative)

I have the authority to bind the Entity.