

**Yellowline Asphalt Products Ltd.  
Modern Slavery Act Annual Report  
May 31, 2024**

## Introduction

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a report for Yellowline Asphalt Products Ltd. (“Yellowline”). This report refers to the 2023 fiscal year end, being December 31, 2023, and describes steps taken by Yellowline in 2023.

Yellowline is committed to acting with integrity and ethically in all of its business transactions. Included in that commitment, is working collaboratively with its suppliers and contractors to identify and reduce the risk of forced or child labour occurring within its supply chain network. Yellowline expects its business partners and suppliers (as well as their respective contractors, agents, subcontractors and sub-agents) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

## Yellowline Structure, Activities and Supply Chains

### Structure

Yellowline is a privately owned company formed under the laws of the Province of Ontario. Yellowline is a fifty-fifty joint venture between Dufferin Construction Company, a division of CRH Canada Group Inc. and GIP Construction & Materials Ltd. Its head office is located at 20 Carlson Court, Suite 800, Etobicoke, Ontario, M9W 7K6.

### Activities

Centrally located within the Hamilton Port Authority, Yellowline’s state-of-the-art asphalt terminal produces a full range of neat and polymer modified asphalt cements capable of meeting Ministry of Transportation of Ontario, municipal and regional specifications. Liquid anti-strip and warm mix additives may be added at the terminal to meet customer needs.

### Supply Chains

Yellowline is committed to respecting human rights and upholding ethical business practices in all aspects of its operations, which includes its relationships with its suppliers. Yellowline’s suppliers provide a variety of goods, including but not limited to base grade asphalt cement and polymers, to facilitate its business dealings and are primarily based in Canada. Yellowline aims to work with reputable, well-established suppliers and is continuously evaluating its relationships with its key suppliers to ensure its short- and long-term goals are being met, including respecting and abiding by the applicable human rights and employment standards laws.

## **Yellowline Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

Yellowline utilizes formal policies, codes of conduct and a diligent governance framework to address the risk of modern slavery, to protect human rights and to create a safe and inclusive work-environment for all employees. Yellowline's relevant policies and due diligence and training processes are described below.

### **Human Rights Policy**

Yellowline maintains a comprehensive Human Rights Policy (the "**HR Policy**") that applies to all personnel who are engaged to provide services to Yellowline. In the HR Policy, Yellowline prohibits the following in all of its operations:

- the use of all forms of forced labour, child labour;
- any form of human trafficking or slavery; and
- the hiring of individuals that are below the age of majority, as defined by applicable law, for positions involving potentially hazardous work.

The HR Policy further establishes that Yellowline will not engage in any activities that encourage human rights abuses or that support trafficking in persons or the use of child or forced labour.

### **Code of Ethics and Business Conduct**

Yellowline has adopted a Code of Ethics and Business Conduct (the "**Code of Ethics**") that applies to all directors, officers, employees and persons acting as authorized agents of Yellowline. It embodies Yellowline's commitment to conducting its business with integrity, honesty and respect, in compliance with all applicable governmental laws, regulations and policies, and in a manner that preserves its reputation and deters unethical behavior and wrongdoing. The Code of Ethics provides an overview of the requirements, standards and expectations to guide all Yellowline representatives in carrying out their duties for, dealings with, and when acting as a representative in any capacity of Yellowline.

It is a requirement that all Yellowline representatives become familiar with the Code of Ethics and apply its principles in the performance of their duties and responsibilities to Yellowline. All representatives have a duty to timely report any conduct that may be in violation of the Code of Ethics and to seek advice if they have any questions whatsoever about the application of the Code of Ethics to any particular circumstance or situation that a Yellowline representative may face.

### **Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour**

Yellowline has taken the following steps to prevent and reduce the risk of forced labour or child labour in its supply chains:

- Updated the form of supplier contracts to adhere to the provisions and obligations of the HR Policy, and requiring audit rights, where applicable.

### **Risk of Forced Labour and Child Labour in Yellowline's Business and Supply Chains and Remediation**

Yellowline has concluded that its supply chains carry a low risk of forced labour or child labour. Yellowline has not identified (a) any forced or child labour in its supply chains or (b) any loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its supply chains. Accordingly, Yellowline did not take any corresponding remedial measures in 2023.

### **Assessing Yellowline's Effectiveness**

As Yellowline did not identify any forced labour or child labour or material risks of forced labour or child labour in its activities and supply chains in 2023, a formal assessment process with regards to Yellowline's effectiveness in ensuring that forced labour and child labour was not being used in Yellowline's business and supply chains was not implemented. That said, Yellowline regularly undertake audits and reviews of various aspects of its business operations. The effectiveness of its business practices and compliance with all applicable laws (including those in relation to forced labour and child labour) are in scope for these assessments. Furthermore, Yellowline continually monitors and improves its company policies as any deficiencies are discovered.

## Approval and Attestation

This report has been approved by the Board of Directors of Yellowline Asphalt Products Ltd.

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.

A handwritten signature in black ink that reads "John Mackay". The signature is written in a cursive, flowing style.

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John Mackay

Director, Yellowline Asphalt Products Ltd.

May 31, 2024

I have authority to bind Yellowline Asphalt Products Ltd.