

AEGP: AECON- EBC GENERAL PARTNERSHIP

2025 Report on Fighting Against Forced Labour and Child Labour in  
Supply Chains

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I. STATEMENT DEVELOPMENT AND APPROVAL SUMMARY

**Aecon – EBC General Partnership** (“AEGP” or the “Company”) has prepared this Modern Slavery Joint Report on Fighting Against Forced Labour and Child Labour in Supply Chain (“Report”), covering the period of January 1, 2025, to December 31, 2025, on behalf of itself. 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 AEGP departments, including Commercial, Legal, Human Resources, Finance, Bidding (Procurement), Health, Safety and Environmental. These departments operate across our enterprise, including across the project entities to which this Report applies. To prepare this Report, we also engaged with each of the reporting entities covered by the Report. This consultation process has supported our enterprise-wide approach against forced labour and child labour.

This Report has been reviewed and approved by AEGP’s Executive Committee on May 8, 2026.

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.”

 Digitally signed by  
Shane McCarthy  
Date: 2026.05.08  
08:51:04-07'00'

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Shane McCarthy  
Vice President, Operations – Aecon Major Project West  
May 8th, 2026.

I have the authority to bind Aecon- EBC General Partnership.

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

### A. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

#### STRUCTURE

AEGP is a general partnership established under the laws of British Columbia, By Its Partners Aecon Constructors West and EBC Inc.

AEGP is a partnership registered under the *Business Names Act* in the province of British Columbia. Its corporate headquarters are in Vancouver. The Company has a workforce of approximately 30 employees, who are based in our office located in Campbell River, British Columbia.

#### ACTIVITIES

AEGP is focused on the construction of the John Hart Seismic Upgrade project (“Project”). The Project will upgrade the earthfill and concrete dam to improve seismic performance. At the core of our corporate strategy lies the fundamental principle of conducting our business operations sustainably and responsibly while adhering to the highest standards of business ethics, quality, safety, and environmental stewardship.

#### SUPPLY CHAIN

In 2025, AEGP worked with approximately 24 domestic suppliers and subcontractors with key areas of spend including materials such as concrete, steel, industrial consumables such as fuel, lubricants, abrasives, adhesives, sealants, lumber, personal protective equipment (PPE), subcontractors such as electricians, rebar installers, and other tradespeople, labour hire, insurance, professional and engineering services.

The products and services AEGP procure are utilized in developing, designing, financing, construction, operations, maintenance, and managing the Project. In this regard, parts may be sourced locally, by AEGP or its vendors and subcontractors, or imported by its vendors and subcontractors.

### B. POLICIES AND DUE DILIGENCE PROCESSES

AEGP has maintained a business commitment with the different persons or entities that interact with the Company and its employees based on ethical principles that guide the functioning of AEGP and are part of our corporate culture.

AEGP is committed to ensuring that there are no human rights violations, including modern slavery or human trafficking, in our supply chains or in any part of our business. AEGP 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.

#### OUR POLICIES

##### Governance and leadership

Our governance framework is founded on our core objectives to deal honestly and fairly, adopt and apply best practices for policies relating to sustainability, safety, governance, health and the environment. These values guide all of AEGP’s activities and form the basis of our Code of Ethics and Business Conduct and our Environmental, Health and Safety Manual, which set the standard of behaviour we expect from all our employees, subcontractors, and partners.

## Compliance

AEGP is committed to upholding human rights through a variety of codes and policies, including, among others:

- **The Aeon Code of Ethics and Business Conduct**, which establishes guidelines for all company members to follow as part of its mission, values, and corporate culture. This code includes the commitment to respect internationally recognized human rights. All Aeon employees are required to read and acknowledge this code.
- **The AEGP Environmental Protection Plan and the Site Safety Management Plan**, includes policies which play an essential role in protecting the environment, workers, and human rights. These policies include the Environmental Protection policies, Health and Safety Policy, Occupational Accountability and Responsibility, Respect in the Workplace, Occupational Health, and Personal Protective Equipment (PPE), among others.
- **The Aeon Procurement Policy**, which requires all third parties, subcontractors, suppliers, and service providers to comply with all policies and codes, including the Code of Ethics and Business Conduct.

These standards are essential pillars on which AEGP continuously applies due diligence processes in its operations to ensure compliance with applicable laws.

Further, AEGP's parent companies have implemented extensive compliance programs designed to identify, prevent, and address any instances of policy violations, including human rights violations. These programs aim to ensure that the parent companies and their operations are conducted ethically, fairly, and in compliance with all relevant laws and regulations. The goal is to create a safe and responsible ethics and business environment /culture and to promote respect for human rights across all levels of the organization.

## Procurement

AEGP ensures that all procurement activities are conducted in compliance with applicable laws and conformance to the highest ethical standards in business practices.

Our Project utilizes procurement frameworks which prescribe policy, systems, and processes to support supply chain due diligence. Activities include assessing risks in our applicable business sectors, conducting comprehensive due diligence, and vetting subcontractors and suppliers. As part of the framework, our Project has a Project Procurement Execution Plan that defines the supplier registration and onboarding process, including questionnaires for assessment, a suite of mandatory template commercial contracts (which forbid human rights abuses), and a set of requirements for suppliers' management of their suppliers.

This approach is key for AEGP and this Project, to build and maintain a reliable and trusted supply chain and proactively identify and manage risks throughout the term of each contract.

## OUR DUE DILIGENCE PROCESSES:

As mentioned in the above, AEGP, through the respective parent companies, has policies and codes to minimize adverse impacts on human rights. Those policies and codes are committed to preventing and reporting forced labour and child labour risks.

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

AEGP's policies and codes are intended to help us continue to prioritize our ongoing efforts to prevent and, if necessary, mitigate adverse human rights impacts through its business activities.

AEGP aims to identify and mitigate all human rights risks by:

- Implementing policies, procedures, and management systems for recruitment that require formal, auditable approval procedures, including verification of the candidate's identity and their right to work in Canada legally.
- Implementing a due diligence process to evaluate key subcontractors and business partners for ethics and compliance.
- Conducting health and safety workplace inspections in order to identify any hazards or conditions that may lead to substandard work conditions. In accordance with Environmental, Health and Safety Manual, inspections are conducted on a weekly basis using the workplace inspection program to address site-specific hazards.
- Implementing clauses in subcontract, supplier and service agreement templates requiring third parties to comply with the Code of Ethics and Business Conduct of the Project and to respect all applicable laws.

### **C. FORCED LABOUR AND CHILD LABOUR RISKS**

AEGP is committed to combating the use of forced labour and child labour. AEGP expects its suppliers, contractors, and clients to share our dedication to ethical standards.

AEGP understand that the construction industry is susceptible to the risks of forced labour and child labour. Therefore, AEGP has adopted a proactive approach to mitigate these risks. As detailed in this report, AEGP has implemented various policies, processes, and practices to manage and prevent forced labour and child labour risks in our supply chain.

AEGP's supply chains may include different participants, such as subcontractors, suppliers, and various specialized service providers, depending on the specific needs of the Project. As a company that procures goods and services from Canada and abroad, if required, AEGP is committed to avoiding purchasing "at-risk" goods and services that may unintentionally contribute to the use of forced labour and child labour. We achieve this through our due diligence processes and by utilizing a suite of agreement templates and contracts, including supplier controls and adherence to the Code of Ethics and Business Conduct or equivalent codes in our Project.

AEGP recognizes that our role in preventing forced labour and child labour extends beyond our organization.

### **D. REMEDIATION MEASURES**

AEGP has not identified instances of forced or child labour in our activities or supply chains. Therefore, no remediation measures have been taken.

In this regard, AEGP encourages a culture of open communication among our employees, subcontractors, and other third parties to report any potentially unethical or illegal practices, particularly those involving human rights grievances. To facilitate this, AEGP partners have well-established communication channels where employees, subcontractors, suppliers, and third parties can raise their concerns or allegations of

misconduct, breach of law, breach of policies or procedures, or violations of the Code of Ethics and Business Conduct securely, confidentially, and anonymously, 24/7, through email or telephone. Reports may be made anonymously. All reports are thoroughly investigated, and AEGP upholds a strict commitment to non-retaliation.

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

We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

#### **F. TRAINING**

AEGP is committed to providing comprehensive training to all its employees. As part of our onboarding process, new hires are required to complete mandatory training as soon as they join the company. Additionally, all employees are assigned mandatory training, by their respective parent company, which may include various courses proposed by different departments, and does include Code of Ethics and Business Conduct.

Compliance with the Code of Ethics and Business Conduct and the Environmental, Health and Safety Manual is mandatory for all employees at AEGP. To ensure their understanding and compliance, AEGP partners have regular training programs where employees are trained on compliance with and the protection of human rights.

Regarding AEGP's supply chain, AEGP continues to implement our Code of Ethics and Business Conduct to our key subcontractors and vendors continue to emphasize our commitments in this area.

### **III. STEPS TAKEN IN THE PREVIOUS FINANCIAL YEAR IN ORDER TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR**

AEGP maintains a strong commitment to ethical and legal business practices, and AEGP unequivocally condemns the use of forced labour and child labour in our operations, as well as those of our suppliers and subcontractors.

AEGP has taken several actions to enhance our capabilities to identify, mitigate, and prevent the risks of human rights violations, including forced labour and child labour, across the Project to respond effectively to any impacts that may arise. These actions included, but were not limited to:

#### **Policies and procedures**

- Continued integration of our **Code of Ethics and Business Conduct**, Environmental, Health and Safety Plans across the Project, which set out our ethics and legal business commitment. We focused on implementing these codes into agreement templates, including requirements to adhere to our ethical and compliance policies or to have equivalent standards, and providing training to our employees on the codes' content, among other actions.
- Including our codes by reference in agreement templates with business partners prohibiting the use of forced labour, slave labour or other forms of involuntary labour at work sites.

#### **Due Diligence**

- Recruitment and hiring processes and controls which ensure that all workers are recruited voluntarily.
- Conducting background verification for all prospective employees.

#### **Awareness and training**

- Continued promotion of the partner companies' hotline, micro-learning and periodic communications, as a grievance mechanism where any unethical and illegal behaviour can be reported, including human rights violations.
- Communicating the principles of the Code of Ethics and Business Conduct and Environmental, Health and Safety Manual amongst key subcontractors and vendors.

#### **Monitoring and Review**

- Investigation and monitoring of incidents reported through the different Ethics Channels provided by the partner companies and offering mechanisms to protect whistleblowers.
- Monitoring, reviewing and reporting on indicators to evaluate the effectiveness of the existing prevention, management, and mitigation mechanisms in the Project.

#### **IV. CONCLUSION**

AEGP is committed to preventing forced labour or child labour from taking place in our businesses and in our supply chains. AEGP will continue to review its policies, procedures, and practices periodically to determine any enhancements that can be made to help prevent forced labour or child labour.