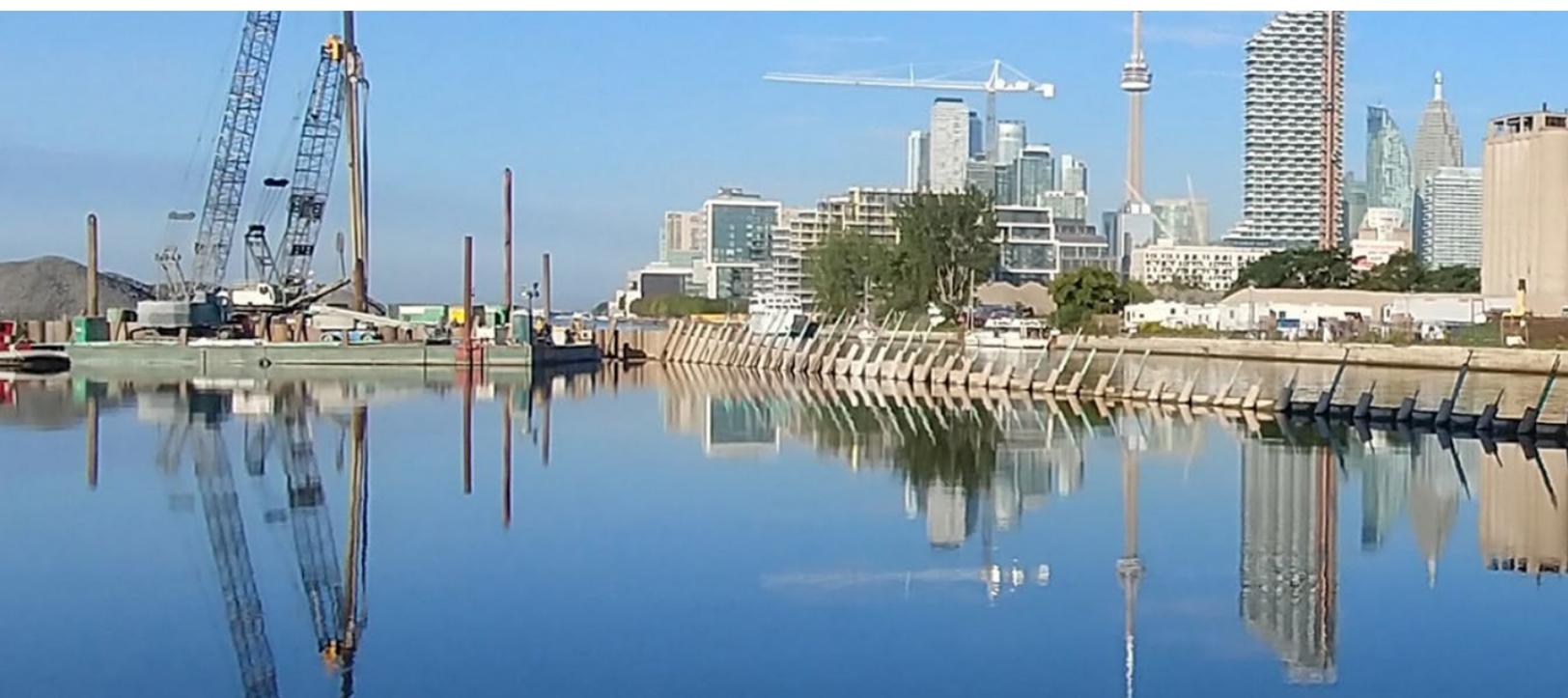




SOLETANCHE BACHY CANADA



# Fighting Modern Slavery

## 2023 Report

May 31, 2024

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# INTRODUCTION

## About this Report

Canada's Modern Slavery legislation, *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the Act") went into force on January 1, 2024. The Act requires specified entities to disclose details regarding their efforts to reduce the risk associated with forced labour or child labour (together referred to as "Modern Slavery") within their operations and direct supply chains. This Fighting Against Modern Slavery 2023 Report (the "Report") has been developed by Soletanche Bachy Canada Inc. ("Soletanche Bachy Canada", "SBC" or "the Company") in relation to the Act.

The Report describes the steps taken by SBC to prevent and mitigate Modern Slavery risks in its operations and supply chains for the reporting period of January 1, 2023, to December 31, 2023, and it identifies activities SBC intends to action to address Modern Slavery risks in the near term.

## STEPS TAKEN TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

Soletanche Bachy Canada conducts a large portion of its supply chain business in Canada and the United States (US) where the risk of Modern Slavery occurring within supply chains is considered to be quite low. However, SBC does acknowledge there is an elevated risk associated with the Company's select Tier 1 Suppliers located in countries where there is a higher potential of forced and child labour, and its indirect Tier 2 and Tier 3 Suppliers due to SBC's limited visibility of their Modern Slavery practices.

This Report details the initiatives and measures undertaken by SBC during the reporting period to proactively address the risks associated with Modern Slavery within its business operations and supply chain. It also highlights SBC's commitment to enhance its control mechanisms through enterprise-wide policies and procedures to minimize and mitigate these risks effectively.

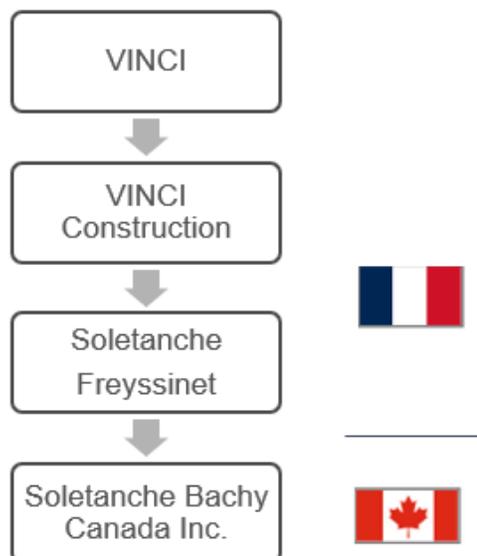
## STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

### Business Activities

Soletanche Bachy Canada has a century of experience providing innovative geotechnical solutions across Canada. The Company was formed by the amalgamation of Birmingham and Agra Foundations in 2019, consolidating leadership in the discipline of geotechnics. SBC employs approximately 290 Canadian employees across its offices, manufacturing, and operations plants located in British Columbia, Ontario, Quebec and Saskatchewan.

SBC's expertise includes the full spectrum of geotechnical procedures, which allow the Company to offer design, construction, remediation, manufacturing of geotechnical equipment, and commissioning of all types of geotechnical structures for tunnels, roads, bridges, rail, mining and maritime infrastructure, and multi-unit residential and industrial buildings.

## Corporate Organizational Structure



Soletanche Bachy Canada is a subsidiary of the French company Soletanche Freyssinet which is ultimately owned by VINCI SA.

SBC is thereby a member of the VINCI Group of Companies (“VINCI” or “the Group”), one of the largest global organizations having an operational focus on construction, infrastructure management, concessions, and energy. Being part of the Group lends itself to collaborative work in the development of policies and due diligence processes across all member companies. This includes policies aimed at ensuring SBC’s approach towards combatting Modern Slavery. As explained in further detail below, VINCI’s sustainability policies, including its Code of Ethics and Conduct, apply to Soletanche Bachy Canada through all of its operations.

## Supply Chain

Soletanche Bachy Canada’s Tier 1 Supply Chain spans 17 different countries and includes more than 1,000 active suppliers. Primarily located in Canada, the US and Europe, where Modern Slavery legislation and robust labour laws and practices have already been established. These suppliers consist of contractors, subcontractors, vendors and consultants which provide materials, goods and/or services to SBC. Less than 3% of SBC’s suppliers are based in foreign countries.

SBC recognizes that its supply chains are integral to the Company’s ability to uphold its sustainability commitments and achieve its environmental, social, and governance objectives. To that end, the Company has implemented thorough guidelines and assessments of the business ethics and practices of all third parties from which it procures its goods and services.

SBC’s primary procurement activities can be categorized as follows:

- **Services required to support Soletanche Bachy Canada’s operations: including leasing of equipment and machinery and associated costs, financial services, and consulting services.**
- **Equipment and other goods required to support Soletanche Bachy Canada’s operations: including inputs and raw material, machinery and parts, and non-storable supplies.**

### Origin of goods supplied from Tier 1 Suppliers

As shown below, the majority of the goods<sup>1</sup> sourced by SBC from Tier 1 Suppliers originate in North America and Europe, where robust labor and anti-Modern Slavery laws and regulations are already in place.



2. The imported goods include products such as construction materials, machinery, and parts of machinery.
3. Other countries include: China, Spain, United Kingdom, Japan, South Korea and Chinese Taipei.

<sup>1</sup> Including consumption of goods in Canada by SBC in conducting its activities. This data does not include the total value of equipment leased from SBC's affiliated companies, clients or foreign rental equipment providers, temporarily imported to Canada by SBC, nor raw material inventories which were not consumed in the production of services rendered during the reporting period.

# COMPANY VALUES, POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

## Values

An important part of the trust relationship that SBC has established with its clients is its promise to respect its company values and ethics. These values include *trust, safety, respecting human rights, integrity, listening to stakeholders, environmental sustainability, and innovation and learning*. They guide SBC's actions and conduct and underpin its management and organizational structure.

## Policies, Procedures and Guidelines

Soletanche Bachy Canada is committed to acting lawfully, ethically, and responsibly. The Company has policies and processes in place to prevent and reduce the risks of forced labour or child labour. These policies and processes apply enterprise-wide and support SBC's commitment to human rights, including preventing and reducing the risk of forced labour and child labour in its operations and supply chains. Modern Slavery can occur in many forms, including slavery, servitude, forced and compulsory labour, human trafficking, deceptive recruiting for labour or services, debt bondage, forced marriage, and child labour. SBC is committed to doing business ethically and has a zero-tolerance policy for human rights abuses.



SBC's policies draw upon the Group's Code of Ethics and Conduct, which underpin SBC's strong values on corporate culture, guide its activities and form the foundation from which the rest of the Company's policies and processes are built. Together, the following policies and guidelines form a framework of standards required by its Board of Directors, officers, employees, contractors and suppliers to ensure human rights are respected, and to identify and appropriately address Modern Slavery risks in its operations and supply chains:

- VINCI's Manifesto
- VINCI's Code of Ethics and Conduct
- VINCI's Guide on Human Rights
- Practical Guide to Sustainable Procurement and Subcontractor Relations Guidelines
- Code of Suppliers' Global Performance Commitment
- Whistleblower Policy

## VINCI Manifesto

The VINCI Manifesto is the Group's overarching guide to the culture of the VINCI Group of Companies, including SBC. It covers all aspects of the Group's corporate responsibility and specifically states that at VINCI "economic success must go hand in hand with employment and social programs." This is further strengthened by the Group's commitment to adhere to the international standards set by the Fundamental Conventions of the International Labour Organization.

The Manifesto includes eight commitments, the second of which commits to compliance with ethical principles in business.

### ***VINCI Code of Ethics and Conduct (“the Code”)***

VINCI’s Code of Ethics and Conduct outlines the principles and rules that all employees of the Group must follow, including business ethics, compliance with laws and regulations, social and environmental responsibility, and the prevention of conflicts of interest. It emphasizes the importance of respecting human rights, maintaining a fair human resources policy, and prohibiting discrimination in hiring and labor relations. The Code highlights the importance of employee well-being, safety, and health, as well as promoting a responsible approach to jobs and skills management. The Code stresses the importance of labour migration and recruitment practices; working conditions; living conditions, human rights practices in the value chain, ethical conduct and compliance with laws and regulations, which include laws related to labor rights and the prevention of Modern Slavery. This commitment aims to ensure that SBC and its employees are aware of the risks associated with forced labor and child labour.

The Code also outlines the mechanisms for reporting concerns or potential violations of the Code by referring to the Group’s Whistleblowing Policy and includes sanctions for non-compliance. As such, non-compliance with the Code can result in sanctions and punishments.

Overall, the Code serves as a comprehensive framework for addressing Modern Slavery risks in supply chains by promoting respect for human rights, ensuring compliance with laws and regulations, providing a mechanism for reporting and addressing concerns, and establishing consequences for non-compliance. It refers to VINCI’s Guide on Human Rights and several international treaties for further guidance.

### ***VINCI’s Guide on Human Rights (“the Guide”)***

In 2003, SBC’s ultimate parent company, VINCI, voluntarily signed the United Nations Global Compact as a member of the Global Group, committing to respect human rights internationally and ensure that it does not become complicit in breaches of those rights.

SBC is governed by VINCI’s Guide on Human Rights, which outlines a set of principles and guidelines to protect the rights of the Group’s employees and local communities affected by its projects. These guidelines are based on international standards set by the United Nations, the Organization for Economic Co-operation and Development (OECD) and the International Labour Organization (ILO). The role of this Guide is to provide a tool for all Group employees having to deal with matters affecting human rights. It identifies five areas in which its activities could impact specific human rights, including: labor migration and recruitment practices, working conditions, living conditions, human rights practices in the value chain, and engagement with local communities. The Guide addresses issues such as fair recruitment practices, ensuring fair wages and benefits, preventing forced labor situations, and providing decent accommodation for workers.

More specifically, the Guide is relevant in addressing Modern Slavery risks in supply chains through its guidance on:

**Labor migration and recruitment practices**, focusing on labor migration and recruitment practices, with a strong emphasis towards preventing forced labor and safeguarding the rights of migrant workers. The Guide discusses migration-related scenarios, including journeys, administration, recruitment, and accommodation and the potential breaches of migrant workers’ rights that can arise from recruitment practices and national migration legislation.

**Working conditions**, emphasizing the importance of ensuring safe and fair conditions for employees. The Guide covers issues related to wage levels, working hours, benefits, representation, hiring guidelines, discrimination, health and safety, and worksite security. It also emphasizes fair pay, work within legal limits, benefits, representation, non-discrimination, and a safe environment. The Guide stipulates that the minimum age for employment is 15—with exceptions for formal apprenticeships—and that workers under 18 should not be exposed to dangerous conditions.

**Human rights practices in the value chain:** SBC has already started the work to secure its value chain from risks associated with breaches of human rights. This has involved following VINCI’s Guidelines on Human Rights and implementing best practices, such as raising awareness among managers, identifying critical human rights issues with subcontractors, and integrating human rights references in the tendering and contractual process.

These guidelines all constitute benchmarks used by employees of SBC in dealing with human rights issues to take stock of existing practice and identify areas for improvement. Failure of SBC to enforce these Guidelines can be reported through the Company's Whistleblowing Policy as described below.

### ***Code of Suppliers' Global Performance Commitment***

The Global Performance Commitment (adopted in 2012) outlines SBC's expectations for its suppliers in terms of sustainable development. Suppliers are expected to adhere to principles related to human rights and labor, including eliminating Modern Slavery, as well as discrimination in employment. Suppliers are also expected to support environmentally responsible practices, such as promoting a precautionary approach to environmental challenges and developing environmentally friendly technologies. Additionally, suppliers are expected to work against corruption in all forms. SBC supports and collaborates with each of its suppliers to improve their social and environmental practices, and the process is reviewed annually to foster stronger relationships and exchange best practices.

### ***Whistleblower Policy***

SBC's Whistleblower Policy acts as a key internal reporting system for the Company. Anyone that becomes aware of any wrongdoing within SBC, with its subcontractors or suppliers can prepare an internal report.

The Policy outlines the process for making a report and emphasizes that SBC is committed to protecting whistleblowers from retaliation or discrimination.

SBC receives periodic reporting of received reports and an audit of the reporting system to ensure its effectiveness and compliance. Through the 2023 reporting period, zero whistleblower reports were received across all categories.

The Company has initiated a formal review in 2024 of applicable policies, procedures and programs to address requirements in relation to Modern Slavery risks within its operations.

## **Due Diligence Processes**

Soletanche Bachy Canada is committed to responsible supply chain practices, including requiring vendors to comply with all laws within their jurisdiction. SBC has adopted the following due diligence processes to ensure the procurement of goods and services adhere to the Company's values, policies and procedures.

### ***VINCI's Practical Guide to Sustainable Procurement and Subcontractor Relations***

VINCI's Practical Guide to Sustainable Procurement emphasizes the importance of considering social, societal, and environmental aspects in purchasing decisions and outlines the five pillars of sustainable procurement. The Guide provides an outline for each phase of the procurement process, including risk identification and prevention, stakeholder engagement, and responsible purchasing.

The Guide also includes instructions for conducting risk analysis, evaluating suppliers, finalizing contracts, and monitoring contract performance.

The Subcontractor portion of the Guide outlines guidelines for subcontractor relations, with a focus on safety, fair commercial relations, transparency, fair competition, and respect for human rights. SBC aims to ensure comparable safety conditions exist for employees and subcontractors, maintain fair and long-term relationships, select subcontractors objectively, and promote transparency. SBC is committed to working with subcontractors who share its values as outlined in the Group's Code of Ethics and Conduct and various other policies and due diligence processes specific to fighting Modern Slavery.

### **Assessment of Tier 1 Suppliers and Third Parties: Recommendations, Ethics and Vigilance**

SBC has developed an evaluation process for suppliers under a Master Services Agreement (MSA) which involves assessing compliance with the MSA's terms and conditions, as well as its ability to meet SBC's expectations in terms of ethics, quantity and quality.

The Supplier Assessment Process includes evaluating suppliers' policies and practices through a questionnaire covering the topics of business ethics, human rights and the environment. This questionnaire serves to identify and assess risks, particularly in terms of business ethics and the obligation of vigilance when entering into contractual relations with the said third party; and is an integral part of SBC's procurement process.

Through this Assessment, SBC aims to ensure that all third parties comply with labour regulations and have robust policies and practices in place to ensure fair and safe working conditions for its employees.

## **ASSESSING THE RISKS OF MODERN SLAVERY IN SOLETANCHE BACHY'S OPERATIONS AND SUPPLY CHAIN**

Soletanche Bachy Canada did not have a formal risk assessment process in place in 2023 to appropriately identify Modern Slavery risk within its operations or supply chains. However, SBC, through VINCI's "Practical Guide to Sustainable Procurement and Subcontractor Relations" does outline each phase of the Company's procurement process, including risk identification and prevention measures. This Guide also provides instructions for conducting risk analysis and evaluating suppliers which will prove to be useful as SBC advances on its Modern Slavery journey.

## **COMPONENTS OF THE BUSINESS AND SUPPLY CHAIN THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR**

Soletanche Bachy Canada's present supply chain consists of suppliers primarily located in Canada and the US. The Company does on occasion source products from other countries, including parts of Europe, China, Hong Kong, Australia and Mexico.

SBC's overall Modern Slavery risk by country of operation is deemed to be low as the majority of its supply chain activities occur in Canada and the US, where robust labour and anti-Modern Slavery laws and regulations have already been established.

SBC has acknowledged the elevated risk associated with its direct suppliers located in countries such as Mexico, where there is a higher possibility of forced and child labour in existing supply chains. SBC also acknowledges that the risk of Modern Slavery may increase further down in its supply chains as SBC has reduced visibility over its Tier 2 and Tier 3 Suppliers. As a result, SBC is revising internal processes to increase supplier engagement activities to deepen its understanding of those suppliers' existing policies and due diligence processes to prevent and detect Modern Slavery risks within its supply chains. SBC intends to start implementing additional due diligence activities with identifiable high-risk suppliers in the remainder of 2024, in an attempt to gain further visibility into its Tier 2 and Tier 3 Suppliers and to better assess the risks of Modern Slavery practices.

As of the date of this Report, there has been no identified instances of forced labour and child labour in Soletanche Bachy Canada's supply chain and SBC has not been subject to any investigation related to these matters.

## **REMEDATION MEASURES OF FORCED LABOUR OR CHILD LABOUR AND LOSS OF INCOME**

As of the date of this Report, Soletanche Bachy Canada has not identified any instances or accusations of forced or child labor, or any cases of vulnerable families experiencing income loss within its workforce or supply chain. Consequently, no remedial actions have been deemed necessary.

In the event that SBC assesses that it has caused or contributed to forced or child labour or to loss of income, SBC will undertake to cooperate with impacted parties to develop the appropriate remediation.

## TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

While Soletanche Bachy Canada did not provide training to team members specific to Modern Slavery in 2023, SBC is exploring the development of Modern Slavery training for employees involved in procurement of goods and services, in the near term.

## ASSESSING EFFECTIVENESS OF OUR MEASURES AND OUR NEXT STEPS

Soletanche Bachy Canada is committed to ensuring continuous improvement across all aspects of its operations and to put in place measures to prevent Modern Slavery across all operations and supply chains.

Soletanche Bachy Canada's ability to operate and ensure long-term success is linked to SBC's ability to identify and manage potential risks to its business – including the risk of Modern Slavery. Assessing the effectiveness of managing this risk is a shared responsibility of Soletanche Bachy Canada's Board of Directors and management.

As this is Soletanche Bachy Canada's first Modern Slavery Report, it is too early to assess and report upon the effectiveness of the anti-Modern Slavery measures SBC is planning to implement this year. In future reports, SBC intends to identify indicators that can be monitored on a year-over-year basis, adjusting as necessary to assess their effectiveness.

## ATTESTATION

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.

I have the authority to bind Soletanche Bachy Canada Inc.



Balazs Gombos  
President, Soletanche Bachy Canada, Inc.  
May 31, 2024