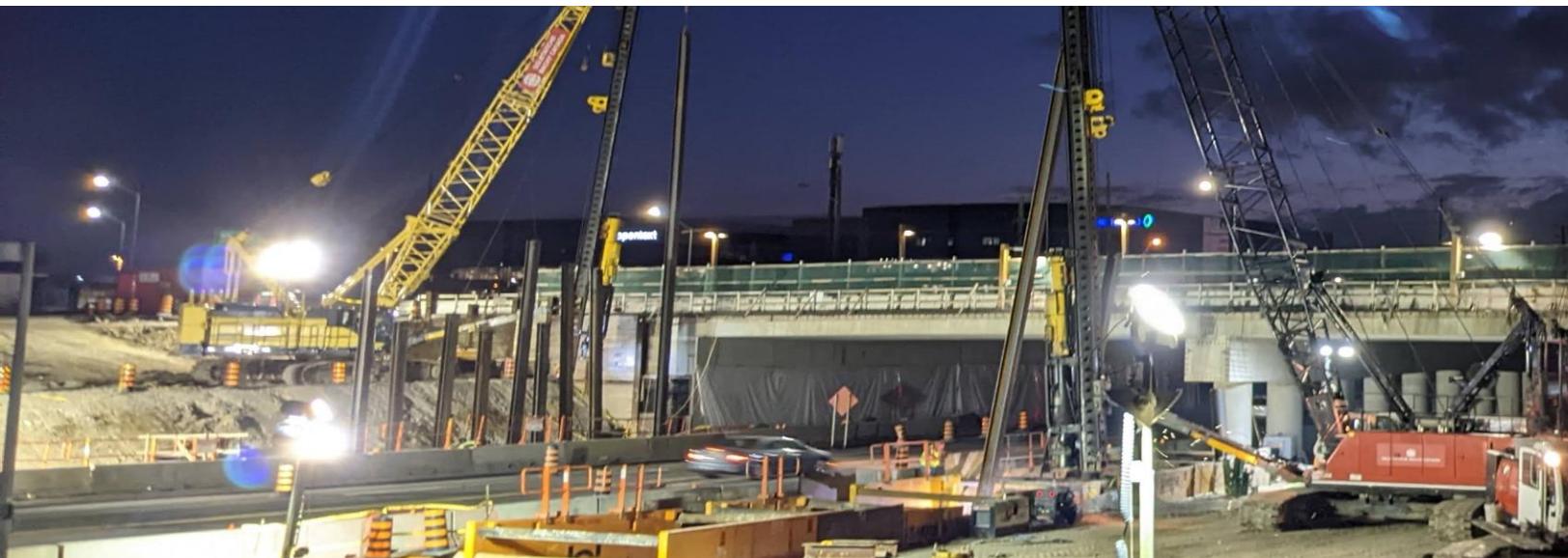


# Fighting Modern Slavery



**2024 Report**

**May 31, 2025**

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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 2024 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 builds upon the Company's 2023 Report and expands on 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, 2024, to December 31, 2024.

## 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 that 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. There is also an associated risk in its indirect Tier 2 and Tier 3 Suppliers due to SBC's limited visibility into 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 Bermingham and Agra Foundations in 2019, consolidating leadership in the discipline of geotechnics. SBC employs approximately 300 Canadian employees across its offices, manufacturing, and operations plants located in British Columbia, Alberta, Saskatchewan, and Ontario.

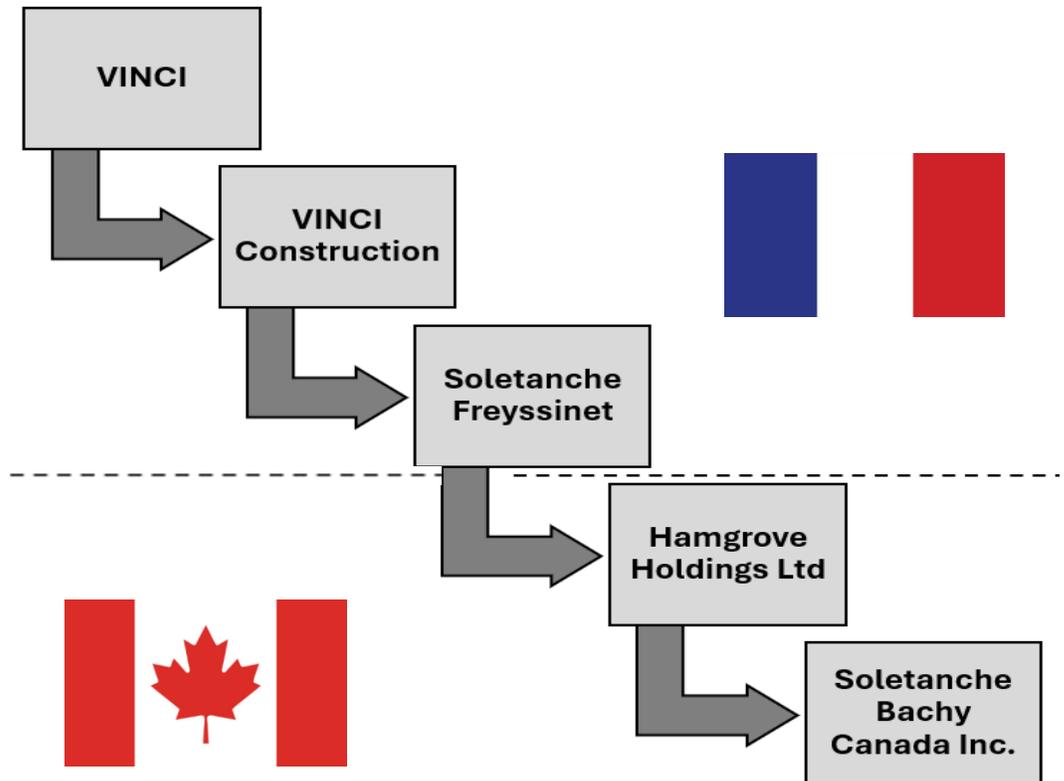
SBC's expertise includes the full spectrum of geotechnical procedures, which allow the Company to offer design, construction, remediation, manufacturing of geotechnical equipment, and commissioning of all types of geotechnical structures for tunnels, roads, bridges, rail, mining and maritime infrastructure,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

## Corporate Organizational Structure

Soletanche Bachy Canada is a subsidiary of a Canadian holding company Hamgrove Holdings Ltd (“Hamgrove”). Hamgrove is a wholly owned by 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 its operations.



## Supply Chain

In 2024, Soletanche Bachy Canada’s Tier 1 Supply Chain spanned 16 different countries which is lower than its 2023 Tier 1 Supply Chain of 17 different countries. In both reporting years, the Tier 1 Supply Chain included more than 1,000 active suppliers. Similarly to 2023, in 2024, the Tier 1 Supply Chain was primarily located in Canada, the US and Europe. In these countries, Modern Slavery legislation and robust labour laws and practices have been existing for several years. The concentration of suppliers outside of these three regions was less than 1% of the total supply chain for SBC in 2024.

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.

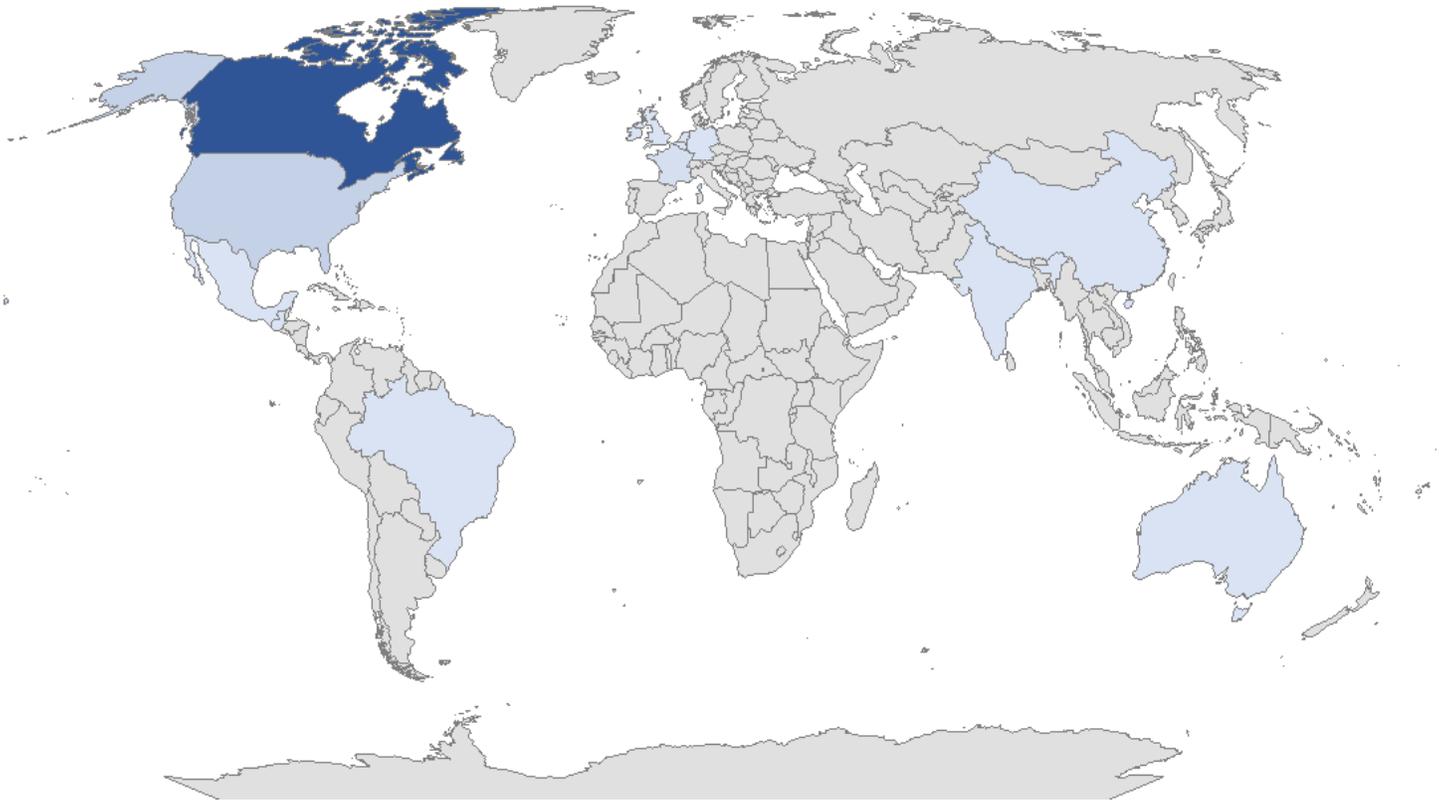
SBC’s primary procurement activities can be categorized as follows:

- 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 in the worldview schematic below, in 2024, most of the supply chain sourced by SBC from Tier 1 Suppliers originate in North America, where robust labor and anti-Modern Slavery laws and regulations are already in place.

### 2024 Supply Chain Concentration



At the Soletanche Freyssinet level, Soletanche Bachy Canada included 10 suppliers under common ultimate ownership as part of the Company's activity in 2024. Out of the 10 related parties that were involved with the procurement activities of Soletanche Bachy Canada, 65% originated from North America, 32% originated from France, 2% originated from the United Kingdom, and the remaining activities originated from India and Singapore. It is important to note that the related parties within Soletanche Bachy Canada's supply chain would be held accountable and subjective to the same level of attention to Modern Slavery and Forced Child Labour as Soletanche Bachy Canada since the initiatives flow down from the common ownership of Vinci. Supply chain activities with related entities in 2024 corresponded to approximately 9% of the total Soletanche Bachy Canada supply chain.

## Comparative of Sourced Products

Soletanche Bachy Canada's concentration of Tier 1 Supply chain with particular focus on Materials, Subcontractor involvements, equipment rentals and usages, and miscellaneous site/project expenditures primarily capture activities in 98.22% of the North American market in 2024 as represented in the table below. Comparatively, in 2023, the concentration of the aforementioned vendors operated at 98.25% of the North American market. This consistency reflected in the table below further identified the stability of sourcing from North American and European markets. Although SBC acknowledges that the risk of Modern Slavery could increase the further down in its supply chains; this large concentration of activity within the North American market helps reduce this risk.

Market	2023	2024
North America	98.25%	98.22%
Europe	1.75%	1.77%
Rest of World	0.00%	0.02%
Total	100.00%	100.00%

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## 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*. These values 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. These policies 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. The below policies 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

These policies were further detailed in the Company's 2023 Report. At the time of drafting this report, the policies noted above were not modified year-over-year.

## **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.

### ***Tier 1 Suppliers Questionnaire***

SBC is committed to developing, and at the time of finalizing this Report, in the process of developing a supplier evaluation questionnaire to assess risk in their Tier 1 Suppliers ability to meet SBC's expectations in terms of ethics, quantity and quality. A copy of this supplier evaluation questionnaire as been included within the appendices of this Report.

As part of SBC's ongoing efforts to comply with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9), SBC developed and issued a comprehensive due diligence questionnaire to its subcontractors and suppliers. This questionnaire is designed to gather information regarding their labour practices, policies, risk management systems, training programs, and any history of incidents related to forced or child labour.

The purpose of the questionnaire is to enhance transparency in SBC's supply chain, identify areas of potential risk, and ensure alignment with SBC's ethical standards and legal obligations. The information collected supports SBC's internal risk assessments and informs the development of targeted mitigation strategies. This initiative reflects SBC's commitment to promoting responsible sourcing practices and upholding fundamental human rights across its operations and business relationships.

# 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 2024 and at the time of finalizing this Report is in the process of drafting a formal risk assessment process to help reduce risk in identifying Modern Slavery within its 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 has been proven 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. In 2024, the Company did source products from other countries, including parts of Europe, China, Guatemala, Australia and Mexico. The total activity from these countries for 2024 was 2.8% of the total Tier 1 Supply Chain of SBC.

SBC's overall Modern Slavery risk by country of operation is deemed to be low. Most of its supply chain activities occur in Canada and the US, totalling 97% of the total 2024 supply chain. In both countries, robust labour and anti-Modern Slavery laws and regulations have been in existence for several years. The concentration of these activities is representative on the worldwide schematic titled: 2024 Supply Chain Concentration.

SBC acknowledges that there could be an elevated risk associated with Tier 1 Suppliers located in countries like: Mexico and China, where there is a higher possibility of forced and child labour in existing supply chains. In 2024, the total concentration of Tier 1 suppliers from Mexico and China totalled less than 0.01%. SBC acknowledges that the risk of Modern Slavery may increase further down in its supply chains. This is a result of the limited visibility that SBC has on its Tier 2 and Tier 3 Suppliers. To improve this visibility, SBC is evaluating internal processes to enhance supplier engagement activities to better understand its Tier 1 Suppliers sourcing. The goal is to ultimately reduce the risk associated with the Modern Slavery exposure that could exist within existing supply chains.

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. As such, 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**

Although Soletanche Bachy Canada expanded on training under Modern Slavery to specific team members during 2024, SBC focused on organizational training for a large concentration of team members under Competition Law and Anti-Corruption. The focus on Competition Law and Anti-Corruption training was a dedicated concentration on Customer related activities and SBC is now focusing on expanding this training into its suppliers.

In support of its broader ethical sourcing goals, SBC also encourages all team members involved in procurement, contract management, or supplier engagement to complete the online “Buying Responsibly” course provided by VINCI. This training helps reinforce responsible purchasing practices and raises awareness of potential risks related to forced and child labour in SBC’s supply chains. In addition to VINCI’s training, SBC continues to evaluate and consider other suitable courses and learning opportunities—such as industry-recognized programs on ethical sourcing, supply chain due diligence, and Modern Slavery—to further strengthen its team’s knowledge and capacity in this area.

## **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.

## **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.

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Balazs Gombos  
President, Soletanche Bachy Canada Inc.  
May 31, 2025

# APPENDICES

# Supply Chain Due Diligence Questionnaire

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For Reporting Entities under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9)

## Section A – Company Information

1. Company Name:
2. Primary Contact (Name, Title, Email, Phone):
3. Business Address:
4. Website:
5. Nature of Business / Services or Products Provided:
6. Number of Employees:
7. Countries of Operation / Manufacturing / Sourcing:

## Section B – Policies and Commitments

8. Do you have a written policy prohibiting forced labour and child labour in your operations and supply chain?

Yes     No

If yes, please attach a copy.

9. Are your policies aligned with any international standards (e.g., ILO Conventions, UN Guiding Principles on Business and Human Rights)?

Yes     No

If yes, please specify.

10. Do you communicate these policies to your suppliers and subcontractors?

Yes     No

If yes, how?

## Section C – Risk Assessment and Management

11. Do you conduct any risk assessments to identify risks of forced or child labour in your supply chain?

Yes     No

If yes, describe the process and frequency.

12. Have any risks of forced or child labour been identified in your operations or supply chain within the past 3 years?

Yes     No

If yes, describe the risks and any corrective actions taken.

13. Do you conduct due diligence or background checks on your own suppliers and subcontractors related to labour practices?

Yes     No

If yes, describe the process.

14. Are your subcontractors or suppliers required to disclose their own supply chain practices regarding forced and child labour?

Yes     No

15. Do you use third-party audits or certifications to monitor labour practices in your supply chain?

Yes     No

If yes, specify the auditor/certification and scope.

## Section D – Training

16. Do you provide training to your employees on identifying and preventing forced labour or child labour?

Yes     No

If yes, please describe.

17. Do you provide guidance or training to your suppliers or subcontractors on labour standards or human rights compliance?

Yes     No

## Section E – Remediation and Reporting

18. Do you have a grievance mechanism or whistleblower channel for reporting labour rights violations?

Yes     No

If yes, describe how complaints are handled.

19. Have any instances of forced or child labour been reported in your supply chain in the last 3 years?

Yes     No

If yes, explain the case(s) and response(s).

20. Are you prepared to support remediation efforts if forced or child labour is found in your supply chain?

Yes     No

If yes, describe what steps would be taken.

## Section F – Declarations and Attachments

21. Please list any relevant certifications, audit reports, or policies you are attaching with this questionnaire (e.g., SA8000, Sedex, WRAP, BSCI, etc.):

22. Declaration:

“We confirm that the information provided above is accurate and complete to the best of our knowledge.

We understand this information may be used as part of [Company Name]’s compliance with Canadian legislation.”

Authorized Signatory Name & Title:

Signature:

Date:

## Attachments and Supporting Documentation

Please attach the following, if applicable:

- Company policies on forced and child labour
- Risk assessment reports
- Supplier Code of Conduct
- Copies of supplier/subcontractor agreements
- Audit reports or third-party certifications
- Training materials
- Grievance mechanism documentation
- Any other relevant documents, listed:

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