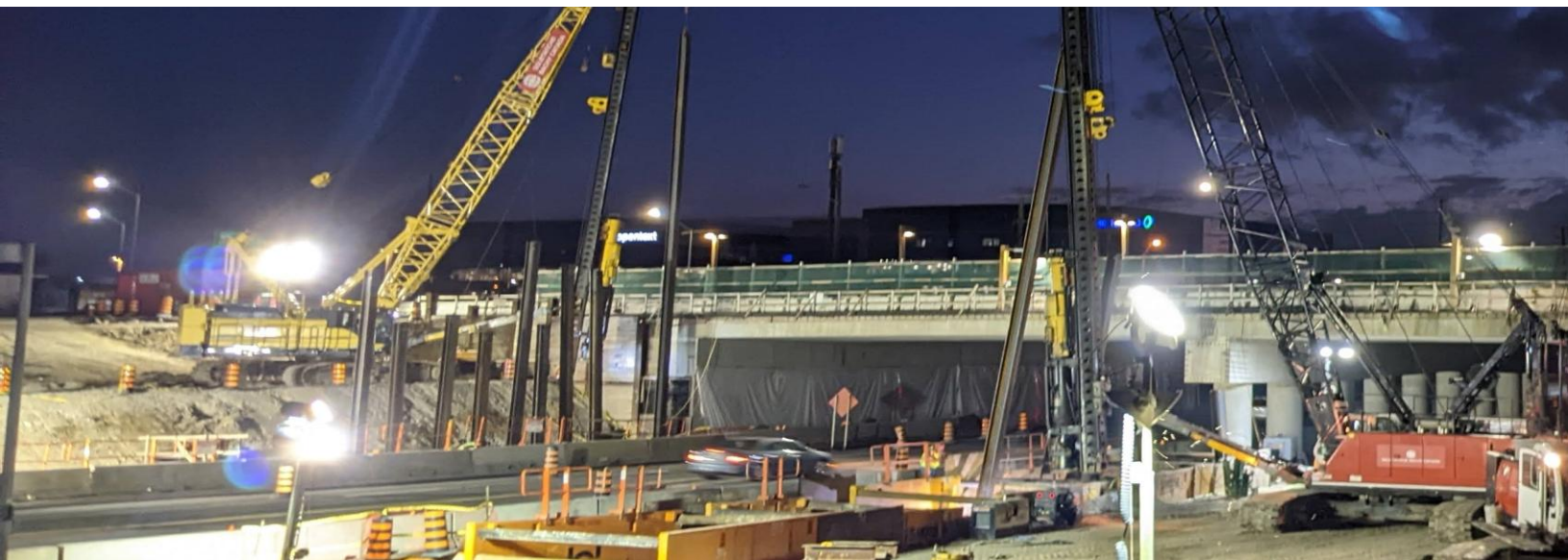


Fighting Modern Slavery



2025 Report

May 31, 2026

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 2025 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 past Reports issued by the Company outlining steps taken by SBC to prevent and mitigate Modern Slavery risks in its operations and supply chains for the reporting period of January 1, 2025, to December 31, 2025.

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 is considered of low risk. The Company does acknowledge that there could be an elevated risk associated with the Company's suppliers located in countries where there could be a higher potential of forced and child labour.

This Report details the actions undertaken by SBC during the reporting period to assess Modern Slavery risks within its supply chain.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Business Activities

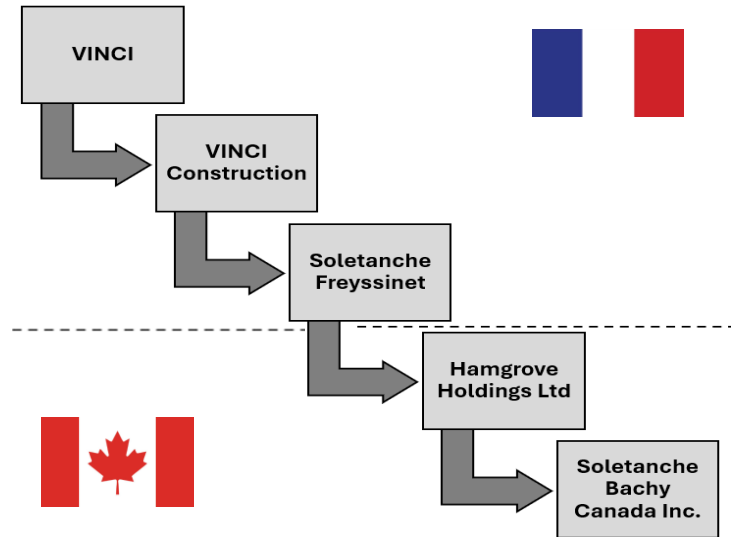
Soletanche Bachy Canada has over one century of experience providing innovative geotechnical solutions across Canada. The Company was formed by the amalgamation of Bermingham and Agra Foundations in 2019, consolidating leadership in the discipline of geotechnics. SBC employs approximately 350 Canadian 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 needs.

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”). Being part of the Group helps increase collaborative work efforts in the development of policies and due diligence processes across all member companies which include policies aimed at ensuring SBC’s approach towards combatting Modern Slavery. As outlined in past Reports and reiterated here, VINCI’s sustainability policies, including its Code of Ethics and Conduct, apply to Soletanche Bachy Canada through its operations.



Supply Chain

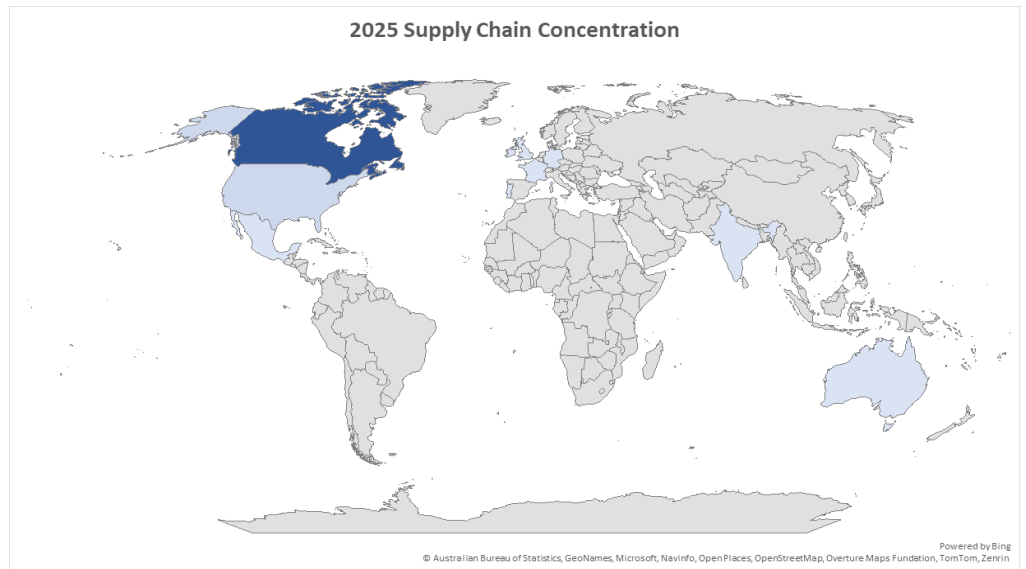
In 2025, Soletanche Bachy Canada’s Tier 1 Supply Chain spanned 11 different countries which is lower than its 2024 Tier 1 Supply Chain of 16 different countries. In both reporting years, the Tier 1 Supply Chain included more than 900 active suppliers. In 2025, Tier 1 suppliers located in Canada, the US and Europe totalled 99.7% of total activity. The Company recognizes that in these countries, legislation surrounding Modern Slavery are more robust.

As referenced in the Company’s 2024 Report, SBC acknowledges that its supply chains are extremely important to help the Company uphold its sustainability, environmental, and governance commitments.

Origin of goods supplied from Tier 1 Suppliers

As shown in the below worldview schematic, in 2025, most of the supply chain sourced by SBC from Tier 1 Suppliers originate in North America, and further, the highest concentration is in Canada where the Company acknowledges that labor and anti-Modern Slavery laws and regulations are already in place.

At the Soletanche Freyssinet level, Soletanche Bachy Canada included 9 suppliers under common ultimate ownership as part of the Company’s activity in 2025. Out of the 9 related parties that were involved with the procurement activities of Soletanche Bachy Canada, 92% originated from North America, 5% originated from Europe, and the remaining activities originated from India. Related parties within Soletanche Bachy Canada’s supply chain are held to the same level of subjectivity by the Group for their standards and practices given the flow down initiatives which are common



within Vinci. Supply chain activities with related entities in 2025 corresponded to approximately 8% of the total Soletanche Bachy Canada supply chain, consistent with 2024 which was 9%

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 99.24% of the North American

Market	2023	2024	2025
North America	98.25%	98.22%	99.24%
Europe	1.75%	1.77%	0.75%
Rest of World	0.00%	0.02%	0.01%
Total	100.00%	100.00%	100.00%

market in 2025 as represented in the table to the left. Comparatively, in 2023 and 2024, the concentration of the aforementioned vendors operated was north of 98% 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.

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

Values

SBC aims to consistently establish trust with its clients and vendors as a 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

Below is a listing of due diligence processes that have been followed by SBC to help ensure the procurement of goods and services adhere to the Company's values, policies and procedures.

Tier 1 Suppliers Questionnaire

During 2025, SBC commenced drafting its' supplier evaluation questionnaire to help assess risk within its' Supply Chain and to ensure that all new vendors were able to meet SBC's expectations. Moreover, at time of drafting this Report, the final version of the questionnaire has been placed into Company-wide use and Management is currently assessing appropriate steps on evaluating existing vendors within its' Supply Chain as to complete a more well-rounded assessment of the totality of its' operations. A copy of the final vendor questionnaire checklist referred to as the "Supply Chain Due Diligence Questionnaire" has been added as an Appendix to this Report. This checklist follows the standards outlined within Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9) and aims to gather the necessary data needed to assess risk within its' Supply Chain.

This initiative aims to capture SBC's commitment in promoting responsible sourcing practices across its operations.

VINCI's Practical Guide to Sustainable Procurement and Subcontractor Relations

Evidenced in the 2024 Report, 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 how to conduct risk analysis in evaluating suppliers, finalizing contracts, and necessary checkpoints needed to continuously monitor 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.

Customer, Subcontractor and Supplier Ethics

When evaluating potential clients, partners and suppliers, SBC looks for commitments from partners to behave ethically, including a commitment to not use forced and child labour, and to make reasonable efforts to ensure that their Supply Chain complies with the same criterium. Some smaller organizations don't publish information like this publicly, and in these instances, SBC requests that they provide a "Certificate of Integrity" stating that they accept, agree with and abide by the VINCI principles. The Certificate of Integrity has been added as an Appendix to this Report.

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

Soletanche Bachy Canada does not have a formal risk assessment process established for 2025 as given the locations in which the Supply Chain is located, management identified low risk potentials occurring. Although SBC does not maintain a formal assessment in use and practice of the VINCI "Practical Guide to Sustainable Procurement and Subcontractor Relations", a rubric helps define the necessary steps in the procurement process inclusive of preventative measures.

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 North America and more specifically in Canada. In 2025, the Company did source products from other countries such as several countries in Europe, Australia, India, and Singapore. The total activity from these countries for 2025 was 0.76% which is considerably down from 2024 activity which 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 99% of the total 2025 supply chain which has increased from 97% in 2024. In both countries, robust labour and anti-Modern Slavery laws and regulations have been in existence for several years. Canada represented 92% of total activity in 2025.

SBC acknowledges that there could be an elevated risk associated with Tier 1 Suppliers located in countries like: Mexico and India, where there is a higher possibility of forced and child labour in existing supply chains. In 2025, the total concentration of Tier 1 suppliers from Mexico and China totalled 0.30% of which 0.15% was with a related entity under the Group. SBC acknowledges that the risk of Modern Slavery may increase further down in its supply chains.

SBC understands that while there might be limited risk to its' Tier 1 Suppliers located in North America and Europe, there is limited visibility on its Tier 2 and Tier 3 Suppliers practices. This is an item that management is conscience of and working to evaluate ways to deepen its' visibility with an ultimate goal to reduce the risk associated with the Modern Slavery exposure that could exist within existing supply chains.

As of the date of this Report, there have 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

During 2024 SBC had focuses on organizational wide training concentrated under Competition Law and Anti-Corruption. The focus on Competition Law and Anti-Corruption training was a dedicated concentration on Customer related activities and during 2025, SBC expanded organizational wide training on its' supplier practices. These trainings included Conflicts of Interest, Buying Responsibly, and Human Rights. Buying Responsibly highlights the use of factors such as labour practices and environmental impact in the choice of suppliers. The idea of these trainings is to further deepen employee understanding of critical issues to best be able to help assess a risky situation.

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.

Balazs Gombos
President, Soletanche Bachy Canada Inc.
May 31, 2026

APPENDICES

SUPPLY CHAIN DUE DILIGENCE QUESTIONNAIRE

Canada – Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9)

COMPANY INFORMATION			
Company Name			
Business Address			
Phone Number		Email Contact	
Website		Head Count	
Countries of Operation	A. D.	B. E.	C. F.

POLICIES AND COMMITMENTS		
Question	Yes/No	Details
Written policy prohibiting forced and child labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, attach copy
Are policies aligned with international standards (ILO / UNGPs)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Specify standards
Communicate policies to suppliers/subcontractors?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe how

RISK ASSESSMENT AND MANAGEMENT		
Question	Yes/No	Details
Conduct risk assessments on forced/child labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Provide Details
Identified risks in past 3 years?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe risks
Conduct supplier due diligence/background checks?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe process
Require suppliers to disclose their supply chain practices?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Use third-party audits or certifications?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Specify in detail

TRAINING		
Question	Yes/No	Details
Employee training on forced/child labour risks?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe
Provide training/guidance to suppliers?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

REMEDIATION AND REPORTING		
Question	Yes/No	Details
Grievance mechanism or whistleblower channel?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Explain process
Any reported cases in last 3 years?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Provide Details
Prepared to support remediation efforts?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe actions

CERTIFICATIONS AND ATTACHMENTS	
Question	Yes/No
Relevant certifications / audits / policies (e.g., SA8000, Sedex, WRAP, BSCI)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Additional supporting documents	<input type="checkbox"/> Yes <input type="checkbox"/> No

DECLARATION
<i>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 compliance with Canadian legislation.</i>

Authorized Signature

Name & Title: _____

Date: _____

CERTIFICATE OF INTEGRITY

I, **(name)**, **(title)**, a duly authorized representative for the purposes here of **(client name)**, whose registered office is located at **(address)**, (hereinafter the "Client")

Certify that:

- the Client has not offered or promised to pay, nor will it offer or promise to pay any sum of money or anything of material value (a "Payment") to any person, while knowing or being aware that such Payment may be offered, paid, given or promised, directly or indirectly, for the purpose of:
 - a. influencing any action or decision of any public administration in contravention of the Criminal Code of Canada or the Conflict of Interest Act;
 - b. influencing any action or decision of another person, with the intent of causing that other person to affect any action or decision of a customer, subcontractor, supplier or other third party;
 - c. securing any inappropriate advantage;
- the Client has read the ethical rules of the VINCI Group (in the attached Appendix), and that the Client accepts the principles therein;
- the Client knows, respects and will respect applicable laws, including, in particular, anti-corruption legislation; and
- The Client will not use forced or child labour, and will use reasonable efforts to ensure its suppliers and subcontractors do not use forced or child labour.

The Client undertakes to promptly inform Soletanche Bachy Canada, if subsequent events render any of these declarations inaccurate.

Signed, on **(date)**.

Signature