

# MAPLE LEAF CONSTRUCTION HOLDINGS LTD'S ANNUAL REPORT AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS FOR THE YEAR ENDING MARCH 31, 2025

APRIL 21, 2025

## REPORTING ENTITY AND STRUCTURE

This is a statement made by Maple Leaf Construction Holdings Ltd. on behalf of Maple Leaf Construction Ltd. and Atkins Underground L.P. (collectively, "Maple Leaf" or the "Company").

Maple Leaf Construction Holdings Ltd. is a private company incorporated in the province of Manitoba.

Maple Leaf Construction Ltd. is a private company incorporated in the province of Manitoba, Canada in 1943, wholly owned by Maple Leaf Construction Holdings Ltd. Atkins Underground L.P. ("Atkins") is a limited partnership formed on July 3, 2007 pursuant to The Partnership Act of Manitoba. Maple Leaf Construction Ltd. and Atkins Underground L.P. have common ownership but are operated separately and independently from each other. They each operate in the construction industry and have head offices in Winnipeg, Manitoba. Maple Leaf has over 800 employees during its peak season.

This report is being filed as a joint report for Maple Leaf, in accordance with section 11(2) of the Modern Slavery Act (the "Act").

## ACTIVITIES AND SUPPLY CHAINS

Maple Leaf is a heavy equipment construction operator and does a variety of work including commercial development, paving and site services, residential developments, highway paving, supply of aggregate materials and specialty products, street reconstruction as well as parking lot repairs and maintenance. The Company is able to work throughout Manitoba, Saskatchewan

and Northern Ontario with the use of mobile plants and crews. Atkins is a construction company that specializes in underground coring and drilling.

The majority of our work is performed with our own labour, equipment and aggregates. We utilize subcontractors to perform work as required, purchase equipment required to perform our services, purchase parts to repair our equipment and purchase goods and services required to perform our work and produce our products.

Our equipment is repaired through our own maintenance shop and third party licensed service providers. We procure parts to repair our own equipment, primarily from the original equipment manufacturer and large trusted suppliers.

We perform an annual review of our largest equipment suppliers to understand both their supply chain and approach to modern slavery.

We also produce our own asphalt and concrete products through use of raw materials sourced from our own quarries and goods and services purchased from third parties.

Our Company relies on a supply chain which comprises small locally owned companies to large multi-national companies listed on various public stock exchanges in North America and Europe. We purchase the majority of goods and services directly from our suppliers located in Canada and when necessary from suppliers located in the United States.

We have reviewed our supply chain and segregated the goods and services purchased into the main categories below:

- Supplies for sewer and water work – pipe and fixtures.
- Trucking of aggregate/asphalt – including hired truckers and accommodations.
- Asphalt and concrete production – including cementitious materials, bituminous binder material, fuel, aggregates, and additive products.
- Equipment purchases and repairs – purchase of parts, supplies, equipment, and third-party repairs.
- Roadworks/paving – including subcontractors providing services and materials, fuel, accommodations, and general contractors.

## POLICIES AND DUE DILIGENCE PROCESSES

Maple Leaf's core values represent who we are and provide the standard of behaviour by which we conduct business. Our employee Code of Conduct embodies the vision of our Company and represents the values that are vital to its continued success and must be signed by every employee. We expect employees to act with integrity, deal fairly and ethically in all matters, to comply with all applicable laws, rules and regulations and report any illegal or unethical conduct.

Maple Leaf has a very strong commitment to health and safety. We are COR certified, have a dedicated safety department and provide ongoing training to our employees. Unsafe labour practices are not permitted, and we respect an employee's right to refuse dangerous work. Our Code of Conduct and Health & Safety Policies are in addition to many other policies, including, but not limited to: Alcohol and Drug policy, Personal Protective Equipment policy, Harassment and Violence Prevention policy, Working alone policy, Diversity policy, Accessibility policy, and a Subcontractor policy. During the year we engaged a law firm to review all of our policies and have updated them accordingly.

Our subcontractors receive an annual health and safety package, which includes our internal policies and procedures, and must sign an Annual Compliance declaration and a Forced Labour attestation. The Annual Compliance declaration states they are familiar with the Manitoba Workplace Safety and Health Act and Regulations and will do everything reasonable and practicable to help ensure a safer job site. They must also maintain adequate insurance and be registered with the Workers Compensation Board. The Forced Labour attestation asks the subcontractor to confirm they have not identified forced labour or child labour in their supply chains and if they do, to notify us; it also asks the subcontractor to confirm they have complied with all local labour laws; and states that a subcontractor can be subject to remedial action if forced labour or child labour is found within their organization. If our subcontractors do not sign the declaration and attestation they will not be eligible to work for us.

Consistent with Maple Leaf's core values and our commitment to human rights and health and safety, we expect that our suppliers and subcontractors will strive to eliminate forced labour and child labour and we will continue to focus on dealing only with those partners that exhibit exemplary core values. We are continuously reviewing our suppliers policies and have found many of our large suppliers have modern slavery policies in place and many more are in the process of implementing policies. We also perform a review of all new suppliers and if appropriate have them sign our Forced Labour attestation.

## PARTS OF OUR SUPPLY CHAIN THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR

We do recognize that certain components of our supply chain may pose a risk of forced labour and child labour. While our primary business is performed with our own internal labour and equipment, we do procure goods and services from the transportation, construction and retail sector. We also purchase services from local subcontractors who may not have labour and immigration practices to our same standard.

Maple Leaf purchases parts and supplies to repair our own equipment from established suppliers in Canada who are listed on a public stock exchange or are known private Canadian companies. We do not regularly import goods from outside of Canada, but there are limited circumstances where an item not available in Canada may be imported from the United States.

Maple Leaf undergoes an extensive annual process to vet subcontractors and will continue to enhance this process to protect against any forced labour or child labour.

## REMEDIATION, IF APPLICABLE

Not applicable. We have not identified any forced labour or child labour in our activities or supply chains.

## REMEDIATION OF VULNERABLE FAMILY LOSS OF INCOME, IF APPLICABLE

Not applicable. 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 or supply chains.

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

Maple Leaf provides all new employees with training on our policies and procedures prior to starting their employment and has them sign off on the employee Code of Conduct. Our senior employees receive annual training on our policies and procedures, and all other employees receive refresher training on a 3 year cycle. During the first quarter of 2025, we engaged a law firm to provide our supervisors, foreman and managers with training on forced labour, accessibility and workplace health and safety. This is part of our ongoing commitment to ensure our employees understand our policies and how important they are to our Company.

## EFFECTIVENESS

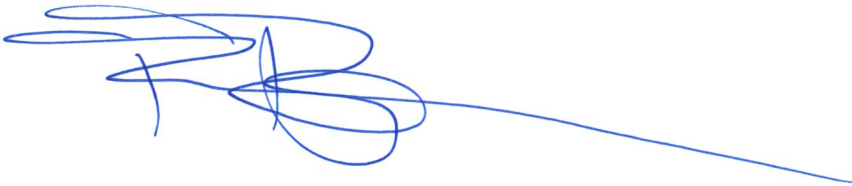
Maple Leaf is continuously working to enhance Company policies and is currently working to enhance our governance with respect to environmental, social, and ethical policies. We do not currently measure our effectiveness specifically related to ensuring that forced labour and child labour is not being used in our supply chains, but we do take care to understand who our suppliers are and to deal with suppliers with high ethical standards. As previously mentioned in this report we engaged a law firm this year to review our policies, identify any gaps and to provide training to our senior employees. We feel this is an important step to ensure our policies remain relevant and our employees understand how important the policies are to our Company.

## ATTESTATION

This report has been approved by the Board of Directors of Maple Leaf Construction Holdings Ltd. and Maple Leaf Construction Ltd. and the general partner of Atkins Underground L.P. pursuant to Section 11(4) (b) (ii) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

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 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 authority to bind the Entities listed above.



**Barry Brown, Director and President of Maple Leaf Construction Ltd. and Maple Leaf Construction Holdings Ltd.**



**Blake Fitzpatrick, on behalf of 5412596 Manitoba Ltd., the general partner of Atkins Underground L.P.**