



Pomerleau Rapport

Fight against modern slavery

POMERLEAU

Introduction

The purpose of this report¹ is to report on the measures initiated by Pomerleau Inc ("**Pomerleau**" or the "**Company**" or "**we**" or "**us**") during the fiscal year ending December 31st, 2024 (the "**Reporting Period**") to prevent and mitigate the risks related to forced labor and child labor in all aspects of its operations, supply chains, as well as in its relationships with partners, clients, suppliers and subcontractors.

Whether it's debt bondage, human trafficking, child labor or forced labor, modern slavery may manifest itself in different ways and go by different names but is essentially based on a single principle: that of depriving an individual of his or her most fundamental freedoms. This reality highlights the need to strengthen our prevention, detection, and accountability mechanisms to guarantee respect for fundamental rights and effectively combat all forms of modern slavery and its supply chains:

Measures to prevent and mitigate the risk of forced labor and child labor

During the Reporting Period, and as detailed in this report, Pomerleau took the following measures to prevent and reduce the risk of forced labor and child labor in its operations:

- carrying out an internal assessment of the risk of forced labor and child labor in our operations and supply chains;
- the implementation of a new policy on sourcing from high-risk countries, which establishes the due diligence process for sourcing from countries at high risk of forced labor, and highlights Pomerleau's commitment to the elimination of child labor from all its activities and supply chains;
- the transmission of a survey on environmental, social and governance (ESG) practices to our main suppliers;
- the addition of a "modern slavery" criterion to our reporting line;
- the annual declaration to the Employee Code of Conduct; and
- the development of specific training on forced labor and child labor for members of senior management and the Board of Directors, and subsequently for employees responsible for Company's procurement.

These measures are described in greater detail in this report.

¹ This report has been prepared in compliance with the Act to combat forced labour and child labour in supply chains (S.C. 2023, c. 9) (the "Act").

Our Corporation

Our Profession

General Contractor

Our Activities

Construct buildings and civil
engineering works across Canada


Our Expertise

Design, construction, financing,
operation, maintenance and demolition

Pomerleau is a privately-owned family business² founded in 1964. Innovation and sustainable construction are at the heart of our growth. We are one of Canada's largest construction companies, with over 5,000 people working in eight (8) regional offices on more than 200 projects.

We take on construction projects of all sizes, whether simple or complex, using traditional or alternative methods, on behalf of public authorities and/or private clients. In addition to buildings for the institutional, industrial, residential, and commercial sectors in collaboration with specialized partners, we also carry out civil engineering works, largely using our own experts and equipment. Our subsidiaries Borea Construction³, ITC Construction⁴ and Pomerleau Capital⁵ bring complementary expertise in renewable energies, residential construction, and infrastructure financing.

Health, safety and respect for the fundamental rights of our employees, clients and community partners are Pomerleau's top priorities. We make no concessions, whether on our worksites or in our supply chain. Our commitment is based on awareness, prevention, detection, and risk management.

We've been named one of Canada's Top 100 Employers since 2020, and one of Canada's Best Managed Companies for 19 years. 

² The corporation was constituted under the *Business Corporations Act* (CQLR, ch. S-31.1).

³ See [Borea Construction](#) website.

⁴ ITC Construction is not subject to reporting obligations under section 9 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

⁵ Pomerleau Capital is not subject to reporting obligations under section 9 of the Act.

At Pomerleau, we tailor our approach to each project, depending on its scope and delivery method. We offer customized solutions based on collaboration, innovation, and cutting-edge expertise.

Our approach is based on collaboration between all our stakeholders, and the use of state-of-the-art technologies to deliver high-quality projects

We apply our expertise in construction, project management and design optimization to buildings in the institutional, industrial, commercial, and residential sectors. Our dedicated teams are responsible for selecting, supervising, and ensuring the quality and integrity of our partners' work.

Our clients can also rely on our own specialists and fleet of heavy equipment to carry out most of our civil engineering work, both on land and underwater.

Each project represents an opportunity to innovate and implement our rigorous health & safety and quality assurance programs, particularly within our supply chain. We are also committed to the highest and most forward-looking environmental and social standards. //

Pomerleau in Numbers

\$5.3

billion in revenues

Over
60

years of know-how

Over
5 000

employees

Over
200

active projects

Over
46,800

jobs created
in Canada

Our Supply Chain

Our supply chain is a process that ensures the availability of the materials and equipment needed to carry out our operations. It involves several stakeholders and stages to ensure continuous and efficient procurement.

Our procurement process applies to the purchase of goods, equipment, materials, and services, excluding subcontracting.


The purchases included in our supply chain are the following:

- equipment and tools;
- consumable products;
- construction material;
- equipment replacement parts;
- leasing of production and support equipment and tools;
- mechanical maintenance services;
- waste management and sanitation services;
- transportation services; and
- other construction site services.

Although we give preference to regional and national suppliers in our supply chain, certain circumstances may necessitate the importation of specific construction materials, notably due to our clients' particular needs, availability constraints or special technical requirements. In all circumstances, we

rigorously assess these situations to ensure the quality and sustainability of our construction projects, while minimizing the risks associated with forced labor and child labor in our global supply chains.

We undertake not to make any purchases in countries with a high risk of modern slavery. This assessment is based on the measurement of the extent of modern slavery carried out by the international human rights group Walk Free⁶ in 160 countries. Their Global Slavery Index (GSI) provides national estimates of modern slavery based on national vulnerability assessments, which consider individual and national risk factors related to forced labor and child labor. The GSI answers three key questions: how many people live in modern slavery, what are the vulnerability factors, and what are governments doing about it?

In light of the data collected for the Reporting Period, we consider the overall risk associated with our supply chain in terms of forced labor and child labor to be very low. 



⁶ walkfree.org

Our Due Diligence Policies and Processes

Integrity is everyone's business

Pomerleau is committed to maintaining an ethical and responsible supply chain, free from forced labor and child labor. To achieve this, we adopt a rigorous approach to governance, business ethics and social responsibility. More specifically, we integrate clear environmental, social and governance (ESG) criteria into our procurement processes, and raise awareness among our clients, partners, suppliers, and subcontractors, we ensure that they comply with international standards on human rights, transparency, and the environment. These efforts, supported by a continuous improvement approach, reflect our determination to combine performance and responsibility, and actively contribute to the development of a more sustainable and responsible supply chain.

Supplier Code of Conduct

We ensure that our business integrity is reflected and communicated by our employees, clients, partners, suppliers, and subcontractors. To this end, Pomerleau requires each supplier and subcontractor to commit to promoting ethical business practices and integrity, while establishing the principles and behaviors expected of them and their own subcontractors.

Thus, by adhering to our Supplier's Code of Conduct, our stakeholders undertake to prohibit and under no circumstances tolerate any form of modern slavery, including forced labor and child labor, both in their activities and in their supply chains.

Employee Code of Conduct

At Pomerleau, people are at the heart of our priorities. We protect human rights in all our activities by fostering a corporate culture based on ethics and integrity. Guided by core values - integrity, transparency and trust, our business practices, behaviors, and decisions are aligned with our Code of Conduct, which was updated in 2023 to reinforce our commitments.

We believe that every individual deserves to be treated with dignity, fairness, and respect, within a framework that guarantees their fundamental rights. That's why we are committed to providing a healthy and respectful working environment, free from exploitation and coercion, where integrity remains the cornerstone of our practices.

In this respect, and since May 2024, all employees must annually train on our Code of Conduct and sign a declaration of adherence confirming their commitment to its principles. In addition, each new employee receives specific training on induction and signs a declaration attesting to their adherence to the values and respect for the rules set out therein.

Through these measures, we reinforce our commitment to preventing all forms of abuse, guaranteeing ethical practices, and ensuring working conditions that meet the highest standards in terms of labor rights.

High-risk country sourcing policy

Pomerleau has adopted a new sourcing policy to clarify its responsible sourcing. Complementing the employee Code of Conduct, the High-Risk Country Sourcing Policy specifies our commitments regarding constraints related to international sanctions and the fight against modern slavery. This policy sets out the guiding principles that govern the procurement practices of our employees, suppliers, and subcontractors, in line with our commitments to prevent modern slavery.

External recruitment policy

Pomerleau works with carefully selected recruitment agencies to attract the best talent while ensuring ethical practices. We integrate strict measures and require our suppliers to respect fundamental rights.

We offer our employees competitive compensation, attractive benefits and a working environment that complies with the law and collective bargaining agreements. This commitment ensures fair conditions and excludes any form of exploitation on our projects.

Environmental, Social and Governance (ESG) Questionnaire

In 2022, Pomerleau developed an ESG questionnaire anchored in its values and strategic priorities to assess the ESG profile of its suppliers, including their initiatives to combat modern slavery. This project has optimized the process and refined the questionnaire to better understand their practices in terms of social responsibility, forced labor and child labor. In 2023, selected strategic suppliers were assessed for their alignment with our priorities and practices, reinforcing our commitment to a responsible supply chain.

During the Reporting Period, we developed a dedicated platform for processing and analyzing the responses received, enabling us to extend the distribution of the ESG questionnaire to a larger number of


suppliers. This tool gives us a more precise overview of our suppliers' level of commitment, particularly in the fight against modern slavery. Thanks to this platform, we can better assess their practices, identify areas for improvement and strengthen our collaboration to promote more responsible and ethical supply chains.

Contracts with our suppliers and subcontractors

Our contracts include provisions requiring our suppliers and subcontractors to adhere to and comply with our Supplier's Code of Conduct. In this way, they are required to actively engage in the fight against modern slavery. These requirements include integrity, ethics, and compliance with international standards for workers' rights and fair working conditions

Reporting Line

Pomerleau has taken steps to ensure confidentiality and anonymity when reporting any actual or potential situation of modern slavery through its external reporting line managed by an independent third party. Employees can report any concerns or misconduct related to forced labor or child labor. Pomerleau undertakes to review each report promptly, and appropriate action will be taken to investigate any allegations or misconduct relating to modern slavery. By providing an external and independent mechanism for reporting, Pomerleau demonstrates its commitment to transparency, and to the fight against forced labor and child labor. We encourage all our employees to contribute to maintaining an ethical and responsible supply chain.

We are continually working to improve our practices to minimize any risk of forced labor and child labor in our supply chain. 

Forced and Child Labour Risks

Pomerleau operates in an industry in Canada where the risk of forced labor or child labor is very low. In fact, the Canadian construction industry is (i) governed by a strict legislative framework in terms of labor laws and regulations; (ii) regulated by unions and collective agreements guaranteeing fair working conditions; (iii) subject to accreditation and certification requirements ensuring contractor compliance; and (iv) composed of a qualified and regulated workforce, limiting the use of workers vulnerable to exploitation.

However, despite this very low risk, Pomerleau remains vigilant and is committed to maintaining ethical and responsible practices with regard to modern slavery. Here are a few concrete actions we took during the Reporting Period to assess the risk of forced labor or child labor in our supply chains:


Internal risk assessment

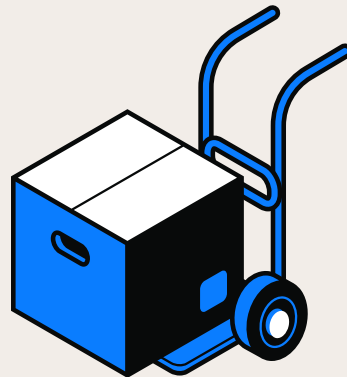
we analyzed our supply chain to identify any purchases from high-risk countries. This assessment led us to conclude that our materials are mainly sourced from Canada.

ESG survey

we have collected a majority of data from the evaluation of our main suppliers. This monitoring mechanism enables us to assess the practices of our suppliers and identify those who may be vulnerable to forced labor or child labor. It also enables us to decide whether to carry out further checks if a potential modern slavery situation is detected.

Risk mitigation

we have adopted a new policy on sourcing from high-risk countries and implemented due diligence measures to minimize the risk of forced labor and child labor. We are also centralizing purchases from countries at high risk of modern slavery, to ensure that we have a process in place to verify these supplies. Pomerleau gives preference to suppliers and subcontractors who share their values and business practices of integrity and responsibility. 



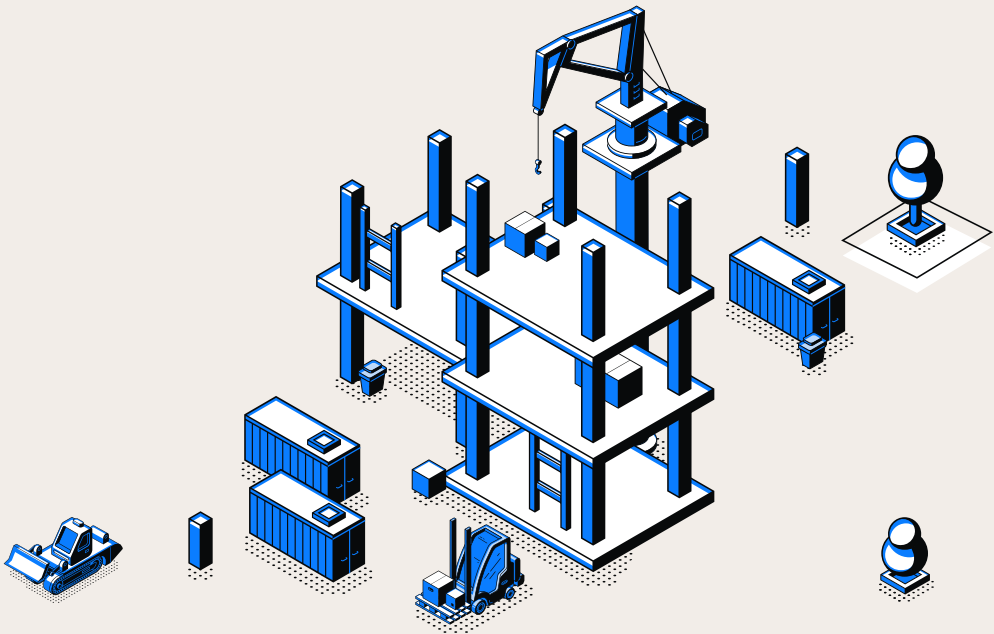
Remedial measures

During the Reporting Period, Pomerleau did not identify any cases of forced labor or child labor in its operations or supply chains. Consequently, no corrective measures were necessary to remedy such situations.

Pomerleau remains vigilant, however, and continues to closely monitor its sourcing practices, implementing due diligence procedures and strengthening its efforts to prevent any form of forced labor or child labor in its operations and supply chains.

Compensation for loss of income

Pomerleau has not identified any loss of income for vulnerable families as a result of measures taken to eliminate the use of forced labor or child labor in its operations and supply chains.



Training

We are convinced that raising our employees' awareness of the issues surrounding modern slavery is essential and will enable us to solidify our commitment to maintaining an ethical and responsible supply chain, free from all forms of forced labor and child labor.

As a result, and during the Reporting Period, we developed a training plan on the fight against modern slavery. An internal awareness session on our obligations and the various measures we have put in place to ensure the detection, prevention, and cessation of forced labor or child labor was developed. It has been offered to members of senior management and the Board of Directors and will subsequently be offered to certain key Pomerleau employees.

Our training plan and measures enable Pomerleau employees to understand and identify the risks of modern slavery within our operations and supply chain. They will be informed of the regions and products most at risk to identify any potential situation of forced labor or child labor and apply the appropriate remedial measures.

Moreover, all Pomerleau employees, including senior management and members of the Board of Directors, are required to undergo annual training on the employee Code of Conduct, which contains clear provisions on our commitment to the fight against modern slavery. This same training course is also mandatory for all new Pomerleau employees



Efficiency assessment

The evaluation of our due diligence practices and measures is essential to ensure effectiveness and continuous improvement.

Key elements of this assessment may include the following:

Collaboration with our employees, suppliers, and subcontractors

By establishing a transparent exchange and integrating clear requirements into our contracts and policies, we obtain a clear picture of the measures taken by our partners to implement our ethical standards. Moreover, the responses to our ESG survey enable us to identify current challenges, adjust our approaches and improve our mechanisms.

Performance indicators

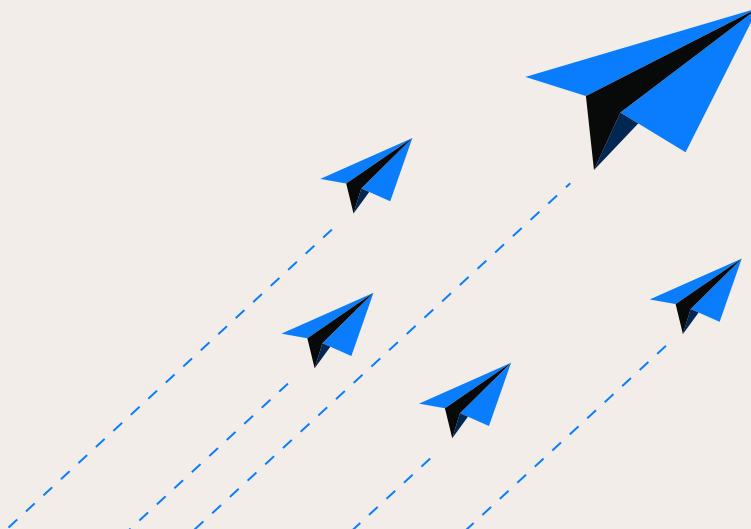
we are committed to defining specific indicators to assess the success of our approach to combating forced labor or child labor in our

supply chains. This may include the number of reports received, the number of situations detected, monitoring carried out, follow-up provided, etc.

Adaptation and improvement:

based on the results and feedback from our stakeholders, we will make any necessary adjustments to our practices. This may include changes to our due diligence policies and measures, the introduction of new practices or the development of additional training

Pomerleau remains firmly committed to preventing all forms of modern slavery in its operations and supply chains. Through rigorous measures, constant vigilance, and continuous improvement of our practices, we reaffirm our determination to act with integrity and responsibility, in collaboration with our partners, to promote an ethical working environment that respects human rights.





Approval

This report was approved by the Executive Committee of Pomerleau Inc. on May 29, 2025.

Certification pursuant to Section 11 of the Act

In accordance with the requirements of the Act, and more specifically section 11 thereof, I hereby certify that I have read the report submitted by Pomerleau and have approved the information contained therein.

Signed by

Philippe St-Cyr Adam
Chief Executive Officer
May 29, 2025

Shaping the future