



2025 → Pomerleau Report

Fight against modern slavery

POMERLEAU

Introduction

This report¹ presents the measures implemented by **Pomerleau Inc.** (“**Pomerleau**” or “**we**” or “**our**”) during the financial year ending December 31, 2025 (the “**Reporting Period**”), to prevent and reduce the risks associated with forced labour and child labour across all of our supply chains, as well as our relationships with partners, clients, suppliers, and subcontractors.

Whether in the form of debt bondage, human trafficking, child labour, or forced labour, modern slavery can take various shapes and be known by different names. However, it is always rooted in a fundamental principle: the deprivation of an individual's fundamental freedoms. This reality underscores the importance of strengthening our prevention, detection, and accountability mechanisms in order to ensure respect for fundamental rights and to effectively combat all forms of modern slavery within our operations and supply chains.

¹This 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 Company

Our Profession

General Contractor

Our Business

Construct buildings and civil engineering works across Canada

Our Specialties

Design, construction, financing, operation, maintenance and demolition

Founded in 1966 Pomerleau is a privately family-owned company whose growth is driven by innovation and sustainability in construction. We are among the leading construction companies in Canada, bringing together around 5,000 employees across eight regional offices and involved in over 220 projects.

We deliver construction projects of all sizes, whether simple or complex, using traditional or alternative delivery methods, on behalf of public authorities and private clients. In addition to building facilities for the institutional, industrial, residential, and commercial sectors in collaboration with specialized partners, we carry out civil engineering works largely with our own experts and equipment. Our subsidiaries **Borea Construction**², **ITC Construction Group**³, and **Pomerleau Capital**⁴ provide complementary expertise in renewable energy, residential construction, and infrastructure financing.

In 2025, Pomerleau continued its national growth strategy as its subsidiary, **ITC Construction Group**, acquired **Farmer Construction**, a trusted leader in British Columbia's residential and commercial construction sectors.

This acquisition has been a key step in our expansion across Western Canada's residential and commercial construction markets. By integrating Farmer's team and expertise, ITC aims to broaden its capabilities across Vancouver Island and beyond. Farmer will continue to operate under its name, maintaining the strong brand, relationships, and reputation it has built over the past 70 years.

² A company incorporated under the Business Corporations Act (RLRQ, c. S-31.1)


³ We invite you to consult the [Borea report](#).

⁴ ITC Construction is not a reporting entity under Section 9 of the Act.

⁵ Pomerleau Capital is not an entity subject to reporting obligations under Section 9 of the Act.

This partnership reflects our shared culture of collaboration, innovation, and construction excellence. By bringing together ITC's national reach and Farmer's deep local expertise, we're creating new opportunities to better serve clients across the region. Both companies bring decades of experience in delivering complex residential and commercial projects, making this partnership a natural fit to meet the growing infrastructure and housing demands in British Columbia and Western Canada.

Pomerleau places high importance on the health, safety, and respect for the fundamental rights of its employees, clients, and partners. No compromise is tolerated, whether in our operations or within our supply chain. Our commitment is reflected through awareness, prevention, detection, and risk-management initiatives.

Since 2021, we have been proudly recognized among Canada's Top 100 Employers and, for more than 20 years, among the country's Best Managed Companies. 

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.


Our Service Offer

At Pomerleau, we tailor our approach to each project based on its scale and delivery method. We provide customized solutions grounded in collaboration, innovation, and cutting-edge expertise.

Our approach is based on collaboration among all our stakeholders, as well as on the use of advanced technologies that enable the delivery of high-quality projects.

We leverage our expertise in construction, project management and design optimization to deliver buildings across the institutional, industrial, commercial, and residential sectors. Our specialized teams, dedicated to each of these markets, ensure the selection of appropriate partners, oversee their activities and guarantee the quality and integrity of their work.

Moreover, our clients benefit from the direct involvement of our in-house specialists and the use of our fleet of heavy equipment, which enables us to carry out the majority of our civil engineering work, both on land and underwater, with enhanced control over details, performance, and safety.

Each project represents a valuable opportunity for us to innovate and apply our most rigorous standards in health, safety, and quality assurance, particularly within our supply chains. We also reaffirm our commitment to upholding the highest environmental and social standards by adopting forward looking practices that reflect our dedication to building responsibly and sustainably. 

Pomerleau in numbers

\$5.4

billion in revenues

Over
60

years of know-how

Over
5 000

employees

Over
220

active projects

Our Supply Chain

Our supply chain is a process designed to ensure the availability of the materials and equipment required to carry out our operations. It involves multiple stakeholders and various steps to ensure a continuous and efficient supply.

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

The purchases included in our supply chain include the following:


- equipment and tools
- consumable products
- construction materials
- equipment replacement parts
- rental of production, support, and tooling equipment
- mechanical maintenance services
- waste management and sanitation services
- transportation services, and
- other site services

Although we prioritize regional and national suppliers within our supply chain, certain circumstances may require the importation of specific construction materials, particularly due to specific client requirements, availability constraints, or technical requirements. In all cases, we conduct a rigorous

assessment of these situations to ensure the quality and durability of our construction projects, while minimizing the risks related to forced labour and child labour within our global supply chain.

We undertake not to make any purchases in countries presenting a high risk of modern slavery. This assessment is based on the measurement of the extent of modern slavery conducted by the international human rights organization *Walk Free*⁶ in 160 countries. Its Global Slavery Index (GSI) provides national estimates of modern slavery based on national-level vulnerability assessments, which take into account individual and national risk factors related to forced labour and child labour. The GSI answers three key questions: how many people are living in modern slavery, what the vulnerability factors are, and what governments are doing to address them.

During the Reporting Period, more than 95% of our purchases were made from suppliers located in Canada. Only 2.52% of our purchases were made outside Canada, 98% of which were from the United States.

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



⁶ walkfree.org

Our Due Diligence Policies and Processes

Integrity is Everyone's Business

At Pomerleau, we strive to be a partner of reference within the industry. This commitment is reflected in exemplary conduct rooted in integrity, aimed at preserving the trust of our employees, clients, partners, and the public. Our values of Authenticity, Excellence, Adaptability, Innovation, and Love guide each of our decisions and actions. They are embodied in our day-to-day behaviours and reflected throughout our operations, shaping the way we collaborate, build, and progress.

Pomerleau is committed to maintaining an ethical and responsible supply chain, free from forced labour and child labour. To achieve this, we adopt rigorous practices in governance, business ethics, and social responsibility. By integrating clear environmental, social, and governance (ESG) criteria into our procurement processes, and by raising awareness among our clients, partners, suppliers, and subcontractors, we ensure that they comply with international standards related to human rights, transparency, and environmental responsibility. These efforts, supported by a continuous improvement approach, reflect our commitment to combining performance with 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 and honest business practices and to take reasonable measures to implement policies and procedures aimed at preventing, mitigating and eliminating the negative impacts of any form of modern slavery within their operations, activities, and supply chains.

By adhering to our *Supplier Code of Conduct*, our stakeholders commit to prohibiting and, under no circumstances, tolerating any form of modern slavery, including forced labour and child labour, both within their activities and throughout their supply chains.

Employee Code of Conduct

At Pomerleau, people are at the heart of our priorities, and we promote the protection of human rights across all our activities by fostering a corporate culture rooted in ethics and integrity. Our core values of integrity, transparency, and trust guide our business practices, behaviors, and decisions, in alignment with our *Code of Conduct*, which was updated in 2025 to strengthen our commitments.

We affirm that every human being must be treated with dignity, fairness, and equality, in full respect for their fundamental rights. We are committed to providing a healthy work environment and to promoting practices rooted in integrity, where no one is exploited or coerced into work.

In this regard, the 2025 annual training on our Code of Conduct serves to reiterate the importance of these principles. A declaration of adherence confir-

⁷ To consult our Supplier Code of Conduct, we invite you to visit the Pomerleau website via the link below: [Ethics and compliance, the cement of our relationships | Pomerleau](#)

ming each employee's commitment to these principles is required. In addition, every new employee receives specific training as part of their onboarding and signs a declaration confirming their adherence to the values and rules set out in the Code of Conduct.

These actions reinforce our determination to prevent any form of abuse, to promote exemplary ethical practices and to ensure working conditions aligned with the highest labour-rights standards.

High-risk Country Procurement Policy

In addition to the Employee Code of Conduct, the High risk Country Procurement Policy outlines our commitments with respect to international sanctions and the fight against modern slavery. It aims to ensure that goods and services acquired from suppliers located in high risk countries comply with strict standards related to ethics, human rights, working conditions and regulatory compliance. This policy helps prevent risks associated with forced labour, exploitation, corruption or any other non compliant practices, while ensuring responsible and transparent supply chain management.

External Recruitment Process

Pomerleau works with carefully selected recruitment agencies to attract top talent while ensuring ethical practices. We implement strict measures and require our partners to follow processes that are ethical and 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 Questionnaire: As part of our ongoing efforts to prevent modern slavery and strengthen due diligence within

our responsible supply chain, Pomerleau has, since 2022, developed an ESG questionnaire rooted in its values and strategic priorities. This tool is used to assess the ESG profile of its suppliers, including their initiatives to combat modern slavery.


Contracts With Our Suppliers and Subcontractors

Our contracts include provisions requiring our suppliers and subcontractors to adhere to and comply with our Supplier Code of Conduct. They are therefore expected to play an active role in preventing modern slavery. These requirements help ensure responsible and ethical practices that align with international standards on workers' rights and fair working conditions.

Reporting Line

Pomerleau implemented measures to ensure confidentiality and anonymity when reporting any actual or potential situation of modern slavery through its external reporting line, which is managed by an independent third party. Employees may report any concerns or misconduct related to forced labour or child labour.

Pomerleau is committed to promptly reviewing each report, and appropriate measures are taken to investigate any allegation or misconduct related to modern slavery. By implementing an external and independent reporting mechanism, Pomerleau demonstrates its commitment to transparency and to combating forced labour and child labour. We encourage all employees to contribute to maintaining an ethical, responsible, and integrity driven supply chain.

During the Reporting Period, no reports related to modern slavery were received. 

Risks of Forced Labour and Child Labour

Pomerleau operates in a sector in Canada where the risk of forced labour or child labour is very low. Indeed, the construction industry in Canada is: (i) governed by a strict legislative framework with respect to labour rights and regulations; (ii) regulated by unions and collective agreements that ensure fair working conditions; (iii) subject to accreditation and certification requirements that ensure contractor compliance; and (iv) composed of a skilled and regulated workforce, which limits reliance on labour that may be vulnerable to exploitation.


However, despite this very low level of risk, Pomerleau remains vigilant and is committed to maintaining ethical and responsible practices with respect to modern slavery. During the Reporting Period, several concrete actions we implemented to assess the risks of forced labour or child labour within our supply chain, including:

Internal Risk Assessment

We continued to analyze our supply chain to identify whether any purchases were made in high risk countries. This assessment enabled us to conclude to confirm that our materials originate primarily from Canada, with the majority of our imports coming from the United States.

ESG Survey

We collected data as part of the assessment of our key suppliers. This monitoring mechanism enables us to evaluate our suppliers' practices and identify those presenting potential vulnerabilities related to forced labour or child labour. This approach also allows us to determine whether more in depth reviews are required when a potential situation of modern slavery is identified.

- During the Reporting Period, we exceeded our target of assessing more than 60% of our strategic suppliers to assess their alignment with our priorities and practices.
- The questionnaire includes key questions designed to measure the level of awareness, prevention and risk management related to modern slavery. These questions allow us to:
 - assess suppliers' maturity with respect to internal training and organizational culture related to human rights;
 - understand the scope of the control mechanisms implemented within our partners' supply chains; and
 - identify complementary initiatives, such as internal policies, audits, codes of conduct, or reporting mechanisms.
- The responses collected enable us to better target risks, prioritize corrective actions, and support our suppliers in improving their practices. This process contributes to strengthening transparency, promoting responsible behaviour and supporting our commitment to an ethical supply chain that respects human rights.
- Following the survey results from the Reporting Period, the ESG team holds meetings, as needed, with suppliers wishing to improve their performance or to better understand of their results.
- We are currently developing a toolkit that will be made available to suppliers to support them in strengthening their initiatives to combat modern slavery. Documents such as recommendations guide to assist suppliers in implementing a modern slavery prevention program will be made available for this purpose. 

Remedial measures

During the Reporting Period, Pomerleau did not identify any instances of forced labour or child labour within its operations or its supply chain. As a result, no corrective measures were required.

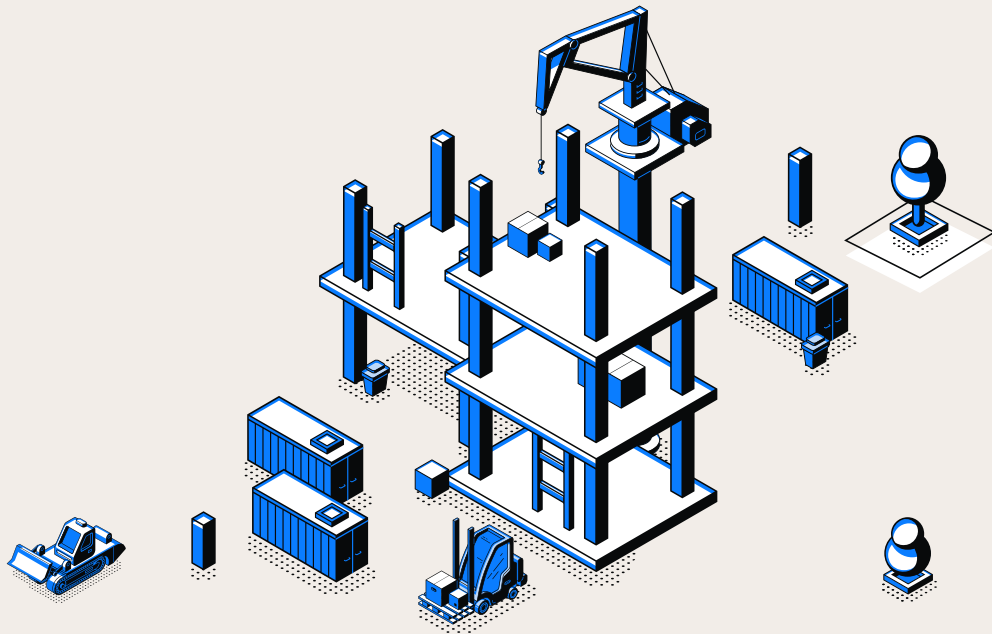
Pomerleau nevertheless remains attentive and continues to closely monitor its procurement practices. We continue to apply rigorous due diligence

mechanisms and to strengthen our initiatives aimed at preventing any form of forced labour or child labour across all our operations and within our supply chain.

Compensation for loss of income

During the Reporting Period, Pomerleau did not identify any situation that resulted in a loss of income for vulnerable families in connection with

the measures implemented to eliminate forced labour or child labour within its operations or within its supply chain.



Training

We are convinced that raising our employees' awareness of issues related to modern slavery is essential and contributes strengthening our commitment to maintaining an ethical and responsible supply chain, free from all forms of forced labour and child labour.

To this end, during the Reporting Period, we developed a training plan focused on combating modern slavery. An internal awareness session covering our obligations and the various measures implemented to ensure the detection, prevention, and elimination of forced labour or child labour was developed. This session was delivered to members of senior management and the Board of Directors and will subsequently be offered to Pomerleau's procurement team.

Our training plan and the measures implemented enable Pomerleau employees to understand and identify modern slavery risks within our operations

and supply chain. Employees will be informed of the regions and products that present the highest risks in order to identify any potential situation of forced labour or child labour and to apply the appropriate remediation measures.

All Pomerleau employees, including members of senior management, are required to complete annual training on the Employee Code of Conduct, which contains clear provisions relating to our commitment to combating modern slavery. This training is also mandatory for all new Pomerleau employees. //



Efficiency assessment

Assessing our practices and our due diligence measures is essential to ensure their effectiveness and to continuously improve them.

The key elements of this assessment may include the following:

Collaboration With Our Employees, Suppliers and Subcontractors

By establishing transparent dialogue and integrating clear requirements into our contracts and policies, we obtain a clear picture of the measures implemented by our partners with respect to compliance with our ethical standards. In addition, the responses collected through our ESG survey enable us to identify current challenges, adjust our approaches and improve our mechanisms.


Performance Indicators

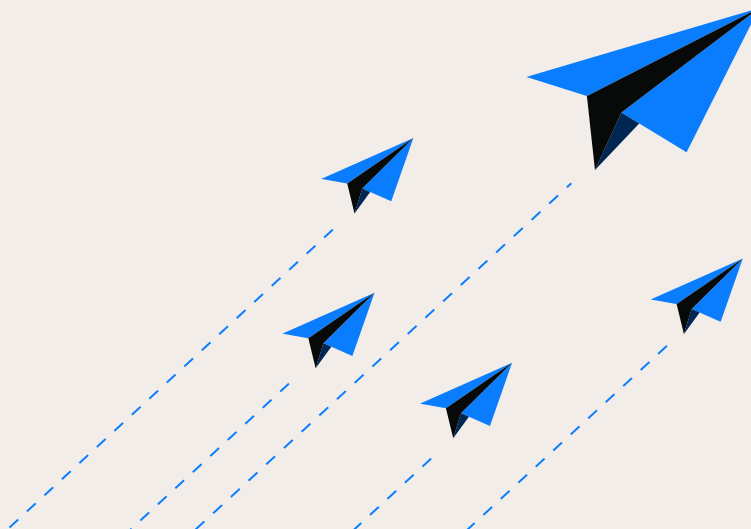
we have committed to defining specific indicators to assess the effectiveness of our approach aimed at combating forced labour or child labour in our

supply chains. These may include the number of reports received, the number of situations detected, monitoring activities carried out and follow-up actions provided.

Adaptation and Improvement

Based on the results obtained and the feedback provided by our stakeholders, we will make the necessary adjustments to our practices. These may include changes to our due diligence policies and measures, the implementation of new practices or the development of additional training initiatives.

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





Approval

This report was approved by the Executive Committee of Pomerleau Inc. on May 28, 2026.

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 28, 2026

Shaping the future