

**Green Infrastructure Partners Inc.  
Modern Slavery Act Annual Report  
May 28, 2026**

## Introduction

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires that businesses review their processes and state actions that they have taken during the previous fiscal year to identify, prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a joint report for Green Infrastructure Partners Inc. (the “**Company**”) and its direct and indirect subsidiaries which have an obligation to publish a report under the Act as set out in Schedule “A” hereto (collectively, “**GIP**”). This report refers to GIP’s 2025 fiscal year, which ended on December 31, 2025 and describes steps taken by GIP in 2025.

GIP is committed to acting with integrity and ethically in all of its business transactions. Included in that commitment is working collaboratively with its suppliers and contractors to identify and reduce the risk of forced or child labour occurring within its supply chain network. GIP expects its business partners and suppliers (as well as their respective contractors, agents, subcontractors and sub-agents) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

## **A. GIP Structure, Activities and Supply Chains**

### **Structure**

The Company is a privately owned company originally formed under the laws of the Province of Ontario on July 1, 2022 pursuant to an amalgamation of GFL Infrastructure Group Inc. and Ground Force Environmental Corp. As of the date hereof and for the purposes of this report, the Company has the following direct or indirect subsidiaries:

- GIP Paving Inc.
- GIP Industrial Inc.
- Russell Redi-Mix Concrete
- Langenburg Redi-Mix Ltd.
- GIP Interpaving Ltd.
- GIP Atlantic Canada Ltd.
- Continental Stone Limited
- GIP Industrial Contractors Ltd.
- GIP Heavy Civil Ltd.
- GIP Marine Base & Warehousing Ltd.
- GIP Technical Solutions Ltd.
- GIP Prairie Ltd.
- GIP Island Construction Ltd.

The Company's head office is located at 100 Commerce Valley Dr. W., Markham, Ontario, L3T 0A1.

The Company completed acquisitions of several entities during the reporting period, including entities that had not previously filed modern slavery reports under the Act. Following closing, the Company has taken steps to integrate these entities into its existing governance framework, including the implementation of its policies and procedures relating to ethical business conduct, supplier standards, and modern slavery compliance. Through this process, the Company has not identified any instances of forced labour or child labour and continues to reinforce its expectations and controls across all newly acquired operations.

### **Activities**

GIP is a diversified infrastructure company. GIP offers end-to-end roadbuilding and vertically integrated civil infrastructure solutions for public and private projects of every size and scale as well as industrial construction, technical and hydraulic maintenance and marine services. For over 100 years, the Company and its subsidiaries and their predecessors have been designing, delivering, and maintaining infrastructure for Canada's growing cities. GIP's five main categories of activities include:

1. Integrated Infrastructure Solutions;
2. Specialty Infrastructure Solutions;
3. Materials Engineering;
4. Alternative Procurement; and
5. Construction Engineering.

GIP produces and sells asphalt, ready mix and pre-cast concrete pipe and structures; extracts, produces and sells aggregates; fabricates and installs structural steel; and sells and distributes asphalt cement, emulsions, and related products.

### **Supply Chains**

GIP is committed to respecting human rights and upholding ethical business practices in all aspects of its operations, which includes its relationships with its suppliers. GIP and its subsidiaries procure construction materials, tools and equipment and supplies such as fuel, personal protective equipment, and administrative supplies. Given the nature of GIP's business, these suppliers are primarily locally based in Canada and the United States<sup>1</sup>. GIP aims to work with reputable, well-established suppliers. GIP's procurement team continuously evaluates its relationships with its key suppliers to ensure its short-

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<sup>1</sup> Both countries having a low prevalence of modern slavery - <https://www.walkfree.org/global-slavery-index/map/>.

and long-term goals are being met which includes respecting and abiding by the applicable human rights and employment standards laws.

GIP may outsource selected construction activities to qualified subcontractors in Canada and such contractors may procure or import products in support of the construction project.

Procurement decisions and subcontractor awards are based on the reliability and reputation of the supplier or contractor to deliver high quality goods and services. GIP has long-term, ongoing, and repeat relationships with many of its suppliers and contractors.

## **B. Policies and Due Diligence Processes**

GIP utilizes formal policies, codes of conduct and a diligent governance framework to address the risk of modern slavery, to protect human rights and to create a safe and inclusive work-environment for all employees. GIP's relevant policies and due diligence and training processes are described below.

### **Supplier Code of Conduct**

GIP's Supplier Code of Conduct (the "**Supplier Code**") sets out its expectations of suppliers of goods and services when conducting business with or for GIP. It makes clear that GIP is committed to conducting business in an ethical, legal and socially responsible manner, and that GIP aspires to work with suppliers who share GIP's core beliefs, values and commitment to performance with integrity.

The Supplier Code states that:

- compliance with the Supplier Code is a fundamental requirement of all agreements between GIP and its suppliers;
- suppliers are required to comply with the Supplier Code and to ensure that their respective employees and representatives understand and comply with the Supplier Code;
- failure to adhere to the Supplier Code may be grounds for termination of the supplier relationship; and
- GIP will not, under any circumstance, knowingly engage any suppliers that exploit children, including recruiting child labour, or engage in any form of forced labour.

### **Human Rights Policy**

GIP has a Human Rights Policy (the "**HR Policy**") that applies to all personnel who are engaged to provide services to GIP. The HR Policy prohibits the following in all of its operations:

- the use of all forms of forced or child labour;
- any form of human trafficking or slavery; and
- the hiring of individuals that are below the age of majority, as defined by applicable law, for positions involving potentially hazardous work.

The HR Policy further establishes that GIP will not engage in any activities that encourage human rights abuses or that support trafficking in persons or the use of child or forced labour.

### **Code of Ethics and Business Conduct**

GIP has adopted a Code of Ethics and Business Conduct (the “**Code of Ethics**”) that applies to all directors, officers, employees and persons acting as authorized agents of GIP. The Code of Ethics sets out GIP’s commitment to conducting its business with integrity, honesty and respect, in compliance with all applicable governmental laws, regulations and policies and in a manner that preserves its reputation and deters unethical behavior and wrongdoing. The Code of Ethics provides an overview of the requirements, standards and expectations to guide all GIP representatives in carrying out their duties for, dealings with, and when acting as a representative in any capacity of GIP.

All GIP representatives are required to become familiar with the Code of Ethics and apply its principles in the performance of their duties and responsibilities to GIP. All representatives have a duty to timely report any conduct that may be in violation of the Code of Ethics and to seek advice if they have any questions whatsoever about the application of the Code of Ethics to any circumstance or situation that a GIP representative may face.

### **Whistleblower Policy**

GIP maintains a Whistleblower Policy that requires employees to promptly report when, among other things, they become aware of a violation of the Code of Ethics or of any external law, rule or regulation. The reports can be made anonymously, and subject to any applicable laws and regulations, GIP will maintain the confidentiality of complaints and the identity of the person making the complaint (if disclosed).

No reports or complaints have been received relating to forced labour or child labour.

### **C. The Risk of, and Steps Taken to Assess and Manage, Forced Labour and Child Labour in GIP’s Business and Supply Chains**

Upon review of GIP’s business and supply chains, it was determined that the overall risk of forced or child labour is low.

On occasion, GIP may purchase certain promotional clothing or sundry items directly from online marketplace suppliers. GIP has identified that these particular supply chains may

carry a risk of forced labour or child labour. Despite that such activities are of *de minimis* value based on GIP's overall vendor spend, having identified this as a potential risk of child or forced labour, GIP has undertaken to regularly scrutinize the suppliers of such goods through such marketplaces and, if necessary, discontinue purchases from those suppliers.

In fiscal 2025, GIP took the following steps to assess and reduce the risk of forced labour or child labour in its supply chains:

- reviewed the Supplier Code to ensure its compliance with regulatory requirements and best practices;
- completed ongoing reviews of supplier operations and practices as part of GIP's supplier assessment program prior to supplier selection;
- continued to ensure that GIP's procurement team reviews and confirms each new vendor prior to acceptance; and
- established a preferred supplier program for promotional clothing and sundry items.

#### **D. Remediation Measures**

Given that there were no incidents identified or complaints received and that there is a low risk of forced labour or child labour in GIP's business and supply chains, GIP did not take any remedial measures in fiscal 2025.

#### **E. Training**

Each new employee is provided an Employee Policy Guide called "The Way We Work" as part of the onboarding process to GIP or any GIP subsidiary. The Way We Work includes all pertinent policies and codes that GIP employees are expected to become familiar with, including the Code of Ethics, HR Policy, Whistleblower Policy and a number of supporting human resource and safety policies.

Further, a significant portion of GIP's workforce is unionized and all such workers on our sites are employed directly as full-time employees for the duration of our projects and comply with applicable employment standards and safety laws. All employees undergo a vetting process to ensure all workers on our sites are properly trained and insured.

#### **F. Assessing GIP's Effectiveness**

A formal assessment process with regards to GIP's effectiveness in ensuring that forced labour and child labour was not being used in GIP's business and supply chains was not conducted in 2025. However, having identified the risk of purchasing certain materials

from online marketplace suppliers, GIP has undertaken to regularly audit and review various aspects of its business operations and supply chain. The effectiveness of its business practices and compliance with all applicable laws (including those in relation to forced labour and child labour) are in scope for these assessments. Furthermore, GIP continually monitors and improves its policies as any deficiencies are discovered.

### **Approval and Attestation**

This report has been approved by the Board of Directors of the Company and on behalf of the Board of Directors of each joint reporter identified in Schedule "A" hereto.

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.



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Patrick Dovigi  
Executive Chair, Green Infrastructure Partners Inc.  
May 28, 2026

I have authority to bind Green Infrastructure Partners Inc.

## Schedule “A” Joint Reporters

GIP entities required to publish a report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and are therefore covered by this group report are:

- GIP Paving Inc.
- Langenburg Redi-Mix Ltd.
- Russell Redi-Mix Concrete
- GIP Interpaving Ltd.
- GIP Industrial Inc.
- GIP Atlantic Canada Ltd. (formerly Pennecon Limited\*)
- Continental Stone Limited\*
- GIP Industrial Contractors Ltd. (formerly Pennecon Industrial Ltd.\*)
- GIP Heavy Civil Ltd. (amalgamated entity of Pennecon Heavy Civil Ltd. and PRMR Construction Limited\*)
- GIP Marine Base & Warehousing Ltd. (amalgamated entity of Pennecon Marine Base Ltd. and Pennecon Grand Banks Warehousing Inc.\*)
- GIP Technical Solutions Ltd. (amalgamated entity of Pennecon Services & Maintenance and Marine Ltd., Pennecon Hydraulic Systems Limited, Pennecon Technical Services Ltd. and The Panel Shop Inc.\*)
- GIP Prairie Ltd. (amalgamated entity of Nelson River Construction Inc. and Gagne Gravel Company Ltd.\*\*)
- GIP Island Construction Ltd. (amalgamated entity of Harbour Transport Ltd., Matheson & MacMillan (1993) Limited and GIP Island Construction Ltd.\*\*\*)

\*Acquired June 2, 2025.

\*\* Acquired August 1, 2025

\*\*\*Acquired November 1, 2025