

Modern Slavery Report (Bill S-211)

Modern Slavery Statement for the Financial Year Ended December 31, 2024

This statement is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Bill S-211). It outlines the steps taken by Infracon Construction Inc. ("Infracon") and the entities listed in Appendix A (together, the "Reporting Entities") during the financial year commencing January 1, 2024, and ending December 31, 2024, to identify and address the risks of forced labour and child labour in their business operations and supply chains.

Infracon respects human rights and is committed to ensuring that forced labour, child labour, and other human rights abuses are not present in its operations or supply chains.

Corporate Structure

- Infracon is a Canadian construction company headquartered in British Columbia.
- Infracon controls or manages several entities engaged in heavy civil construction and pipeline integrity.
- The Reporting Entities operate in Canada and serve clients primarily across Western Canada.
- A full list of included entities is provided in Appendix A.

Supply Chains

Infracon and its subsidiaries procure construction materials, equipment, and related supplies primarily from Canadian vendors.

- Infracon prioritizes domestic procurement.
- Certain specialized parts and equipment may be sourced from the United States.
- Imports are infrequent and primarily for operational use. These are sourced from well-established suppliers in jurisdictions with strong labour standards.

Policies and Due Diligence

- Infracon is developing a formal policy on supply chain labour practices, including zero tolerance for forced or child labour.
- Procurement activities already incorporate informal due diligence by sourcing from reputable suppliers and using management review and approval processes.
- Beginning in 2024, Infracon initiated internal review procedures to assess the risk of forced labour or child labour in its supply chain.

Risks in Supply Chains

Given the domestic focus of operations and limited import activity, the risk of forced or child labour in the supply chain is considered low.

Potential risks include:

- Limited visibility over upstream suppliers of parts and raw materials;
- Imports of equipment components manufactured outside Canada and the U.S.

Actions Taken

- Sourcing primarily from Canadian and U.S. suppliers, which are considered low-risk jurisdictions.
- Internal supply chain risk assessments to identify higher-risk suppliers or goods.
- Commitment to terminate supplier relationships if forced or child labour risks are identified.

Remediation Measures

Infracon has adopted a zero-tolerance policy for forced and child labour.

- If identified, supplier relationships will be terminated.
- Alternative suppliers will be engaged.
- Any findings will be reviewed by management, with corrective actions documented.

Training

- Procurement and supply chain staff will receive training on Bill S-211 and Infracon's policies.
- Training programs will be developed further in 2025 and tracked annually.

Assessing Effectiveness

Infracon will measure effectiveness through:

- Annual risk assessments of suppliers and imports;
- Tracking training completion for relevant employees;
- Ongoing monitoring of procurement practices and supplier reputations.

Approval and Attestation

This statement is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for the financial year ending December 31, 2024.

It has been approved by the Board of Directors of Infracon Construction Inc.

A handwritten signature in black ink, appearing to read "C. Hampson", written over the printed name.

C. Geoffrey Hampson
Chief Executive Officer
Infracon Construction Inc.
September 8, 2025

Appendix A — Reporting Entities

This statement applies to:

- Infracon Construction Inc.
- Lower Nicola Site Services Limited Partnership
 - 49% owned
 - Infracon is the managing partner
- Ogilvie Mtn Holdings Limited Partnership
 - 49% owned
 - Infracon is the managing partner
- Minex Contractors Ltd.