

Modern Slavery Report (Bill S-211)

Modern Slavery Statement for the Financial Year Ended December 31, 2025

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, 2025, and ending December 31, 2025, to prevent and reduce the risk of forced labour or child labour in their business operations and supply chains.

Infracon respects human rights and is committed to conducting business ethically and responsibly. Infracon prohibits the use of forced labour, child labour, human trafficking, or any form of modern slavery within its operations and 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 services.
- The Reporting Entities operate in Canada and serve clients primarily across Western Canada.
- A full list of included entities is provided in Appendix A.

Activities and Supply Chains

The Reporting Entities procure construction materials, heavy equipment, tooling, vehicle components, fuel, industrial supplies, and related operational goods primarily from Canadian suppliers.

- Procurement activities are focused primarily within Canada and the United States.
- Imports from outside North America are infrequent and generally limited to specialized operational components or equipment.
- Suppliers are generally established vendors operating in jurisdictions with recognized labour protections and regulatory oversight.

Management assessed the organization’s operations and supply chain profile during the reporting period and determined the overall risk of forced labour and child labour to remain low.

Policies and Due Diligence

During the reporting period, Infracon maintained and communicated its Modern Slavery Policy and related procurement guidance.

The organization's controls and due diligence measures included:

- Supplier sourcing practices focused primarily on established Canadian and U.S. vendors;
- Management review and approval processes for procurement activities;
- Risk-based consideration of supplier origin and product sourcing;
- Escalation procedures for procurement concerns involving unclear sourcing or elevated risk indicators;
- Employee training and awareness initiatives relating to forced labour and child labour risks.

Infracon maintains a zero-tolerance approach toward forced labour and child labour.

Risk Assessment and Management

Infracon assessed risks relating to:

- The jurisdictions from which goods may be sourced;
- The types of products and equipment procured;
- The limited use of imported specialized components;
- Supplier reputation and established operating history.

Potential areas of elevated risk include:

- Limited visibility into upstream manufacturing supply chains;
- Components or equipment manufactured outside Canada or the United States.

To mitigate these risks, the Reporting Entities:

- Prioritize domestic and North American procurement where practical;
- Source from established and reputable suppliers;
- Escalate procurement concerns to management for review;
- Reserve the right to discontinue supplier relationships where forced labour or child labour concerns are identified.

No instances of forced labour or child labour were identified within the Reporting Entities' operations or known supply chains during the reporting period.

Remediation Measures

As no instances of forced labour or child labour were identified during the reporting period, no remediation measures were required.

If any such risks or incidents are identified in the future, management will investigate the matter and take appropriate corrective actions, including termination of supplier relationships where necessary.

Training

During the reporting period, Infracon maintained internal training and awareness materials regarding obligations under the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Training was provided to relevant employees involved in:

- Procurement;
- Accounts payable processing;
- Vendor approval;
- Supply chain oversight.

Assessing Effectiveness

Infracon assesses the effectiveness of its measures through:

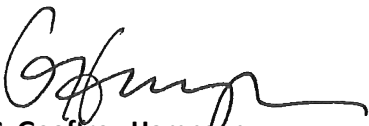
- Ongoing management oversight of procurement activities;
- Annual review of supply chain risks;
- Monitoring of sourcing practices and supplier relationships;
- Tracking employee training completion;
- Review of procurement escalation matters, if any.

Based on the organization's assessment during the reporting period, management believes the measures implemented remain appropriate and proportionate to the organization's operational and supply chain risk profile.

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, 2025.

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

A handwritten signature in black ink, appearing to read "C. Hampson".

C. Geoffrey Hampson

Chief Executive Officer

Infracon Construction Inc.

May 15, 2026

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
- SK'atsin Infracon Site Services Limited Partnership
 - 49% owned
 - Infracon is the managing partner
- Minex Contractors Ltd.