



REPORT ON FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Maple Reinders
Constructors Ltd.



INTRODUCTION

This Report has been prepared in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2003, c. 9 (the “Act”), which requires certain entities to report on the measures taken to prevent and reduce the risk of forced labour or child labour in their supply chains.

We are reporting on behalf of Maple Reinders Group Ltd. and its subsidiary or affiliated entities, including Maple Reinders Constructors Ltd., Maple Reinders PPP Ltd., Maple Reinders Capital Corp., and Maple Facilities Management Inc. (collectively, “**Maple Reinders**”, “we”, “us”, or “our”).

This Report addresses our most recent fiscal financial period from January 1, 2024 to December 31, 2024 and outlines the steps Maple Reinders has taken to identify, prevent and reduce the risk of forced labour or child labour in both (i) the production of goods in Canada and (ii) the importation of goods into Canada.

This Report is based on the information available as of the date of publication and reflects our ongoing commitment to continuously improving our policies and practices. Maple Reinders is committed to conducting all business activities with integrity and expects the same from its suppliers and business partners, including compliance with all applicable human rights and employment standards legislation.



OUR STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Maple Reinders is a federally incorporated corporation under the *Canadian Business Corporations Act*. Our registered head office is located at 2660 Argentia Road, Mississauga, ON L5N 5V4. We maintain offices in Cambridge, Mississauga, Calgary, Edmonton, Burnaby, and Kelowna and have successfully completed construction projects across Canada.

Founded in 1967, Maple Reinders was built on a vision of integrating design, engineering, and construction to consistently deliver high-quality building programs with integrity, leadership, and trust. Today, we are recognized as a full-service builder and a leader in both ICI and civil/environmental construction. In Canada, we are supported by a team of approximately 500 full-time employees.

Maple Reinders is a proud recipient of numerous prestigious corporate and industry awards, reflecting our unwavering commitment to sustainability, safety, and design excellence. We are honoured to be a five-time recipient of the Canadian Construction Association's Environmental Achievement Award, a testament to our leadership in environmentally responsible construction. Our projects consistently set new benchmarks for innovation and quality. The Sechelt Water Resource Centre, for example, has earned a record eight separate awards recognizing its excellence and groundbreaking design.

Leadership at Maple Reinders is equally distinguished. Our CEO, Harold Reinders, was awarded the Jock Tindale Memorial Award for Integrity by the Ontario General Contractors Association, underscoring our core values driven approach to business.

Further cementing our reputation, we have been recognized as one of Canada's Best Managed Companies, achieving Platinum status for 15 consecutive years—a reflection of our operational excellence, strategic vision, and enduring commitment to our clients and communities.

Maple Reinders has achieved the prestigious recognition as being a Gold Seal Employer from the Canadian Construction Association (CCA), highlighting our commitment to excellence, ongoing professional development and leadership in the construction industry. The Gold Seal Program certifies construction management professionals who meet the highest standards in the industry.

Our expertise allows us to provide services across the entire project lifecycle; from pre-construction activities (site selection, constructability reviews, value engineering, equity and financing) to construction execution and post-construction services (operations, maintenance, and repair).

While Maple Reinders does not directly produce or sell goods, our supply chains consist primarily of North American suppliers that provide materials, goods, and services to Maple Reinders, including contractors, subcontractors, vendors, and consultants. From time to time, we may import supplies into Canada, substantially all of which come from the United States, including, among other things, machinery, equipment, parts, and tools. The value of supplies imported into Canada by Maple Reinders is immaterial relative to our overall supply expenses (imported and domestic). In general, we focus on working with suppliers who are willing to uphold our Core Values and Code of Ethics.



OUR POLICIES AND DUE DILIGENCE PROCESSES

Maple Reinders has established several internal policies and due diligence processes to promote responsible practices throughout our operations and those of our suppliers and subcontractors:

- **Maple Reinders' Core Values:** Our five Core Values – People, Integrity, Relationships, Stewardship and Ingenuity – defines the actions, behaviors and practices expected of and required by Maple Reinders' officers, directors, and employees. The Core Value ensures that we conduct our business to the highest standards within and outside of our organizations.
- **Maple Reinders' Code of Ethics:** Our Code of Ethics is an extension of our Core Values and provides a guide for the conduct and actions of the third parties with whom Maple Reinders does business. We expect our subcontractors, suppliers, and partners to be committed to developing a sound and responsible business in line with legal, ethical, environmental, and social principles to ensure a responsible and ethical approach across all levels of operation.
- **Maple Reinders' Labour Law Compliance:** We comply with all applicable Canadian labour legislation and employment standards.
- **Maple Reinders' Contractual Controls:** Within our project contract (including all subcontracts, purchase agreements, supply agreements, and partnership or joint venture agreements), we include standard contractual terms highlighting our Code of Ethics and require our subcontractors, suppliers, and partners to adhere to anti-bribery & corruption practices. We also require our subcontractors, suppliers, and partners to conduct their business in accordance with ethical business practices and comply with all applicable legal requirements, including workplace/occupational health and safety requirements. We continue to update our standard subcontract to identify and address the risks of forced labour and child labour practices in their operations and supply chain in the coming year.
- **Maple Reinders' Subcontractor Pre-Qualification Process:** Many of Maple Reinders' subcontractors and/or suppliers must complete our pre-qualification process, which contains questions about the business's safety program and performance. Subcontractor performance is evaluated and recorded within our project management system at project closeout, and we assign each vendor a rating.

FORCED LABOUR AND CHILD LABOUR RISKS AND MANAGEMENT

We recognize that forced labour and child labour are a global and complex challenge. Although we have concluded that our supply chain carries a low risk of forced labour or child labour, we nevertheless recognize that we do not fully control our supplier's and subcontractors' activities. Therefore, despite our best efforts to take increased actions to ensure our supply chain is free of any forced labour or child labour, there nonetheless remains a risk of forced labour or child labour on products we source from third parties where we may not have visibility into their supply chain.

We are continuously committed to implementing strategies and processes to better identify and prevent forced labour and child labour risks within our operations and supply chains. We have and will continue to use the following steps to assess, manage, prevent, and reduce risks of forced labour and child labour:

- Inclusion and enforcement of contractual clauses requiring compliance with applicable laws and our Code of Ethics.
- Encouragement of ethical conduct through supplier pre-qualification and performance evaluation.
- Use of subcontractor default insurance (SDI) vetting to monitor subcontractor practices.
- Oversight by our National Director of Risk Management & Strategic Initiatives, who is responsible for monitoring our progress and driving improvements in all risk areas.



REMEDATION MEASURES

To date, Maple Reinders has not identified any instances of forced labour or child labour within our operations or supply chains. As such, no remediation measures have been taken to date. Should such a situation arise, we are committed to responding promptly and appropriately, including engaging with relevant stakeholders to develop effective remediation strategies.

Maple Reinders will continue to assess its activities and supply chains and consider appropriate means of remediation for forced labour or child labour should they arise.

REMEDATION OF LOSS OF INCOME

Maple Reinders is not currently aware of any instance where its efforts to prevent and reduce the risk of forced labour or child labour in its activities or supply chains contributed to a loss of income for vulnerable families.

Nonetheless, we will remain vigilant about this possibility and will address any such outcomes with appropriate consideration and care.

TRAINING

As part of our onboarding program, all new employees are required to undertake extensive internal training that includes the review, acknowledgement, and acceptance of Maple Reinders' safety and corporate policies and Core Values. Ongoing training opportunities are made available to ensure employees remain current with company expectations, policies, and relevant legal requirements.

Although we do not currently have formal training programs specifically focused on forced labour or child labour, we will continue to evaluate and implement dedicated training and awareness activities as necessary.

MEASURING EFFECTIVENESS

At present, Maple Reinders does not have a formal process for measuring effectiveness in the mitigation and prevention of forced labour and child labour risks other than a periodic review of our activities, suppliers, and supply chain. Going forward, we will work to develop a more formal process.

APPROVAL AND ATTESTATION

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. 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 within this Report.

John Wiersma

Chairman of the Board of Maple Reinders Group Ltd.

May 31, 2025

I have the authority to bind Maple Reinders Group Ltd.



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