

Modern Slavery Report

SUBMITTED BY

Alberici Constructors Inc.
Alberici Constructors Ltd.
Alberici Constructors Holdings, LLC

FINANCIAL YEAR ENDING

December 31, 2023

Anti-Corruption Policy

Alberici's Anti-Corruption Policy establishes clear guidelines and procedures for preventing, identifying, and addressing any forms of corruption, including bribery and fraud. The Policy promotes a culture of ethical conduct and integrity among employees, contractors, and business partners, ensuring compliance with relevant laws and regulations. The policy prescribes behaviours to protect the company's reputation, foster a transparent and fair business

(applicable at our unionized locations), and our commitment to respecting and observing all human rights, in accordance with applicable law and the principles set forth in applicable international standards.

Alberici has the ability to control its supply of steel through Hillsdale Fabricators, an Alberici wholly owned subsidiary that specializes in the

Child Labour and Young Worker Policy

Alberici is committed to protecting and 7M,, /EÜpÍjEÖ²j/ÜÍÖE7j ÌjjI MþÍjf /i²/7jþþ«j prohibits child labour. This policy reinforces Alberici's fundamental values of creating a safe, respectful, and nurturing environment for all individuals involved in our operations.

Forced Labour and Child Labour Risks

Alberici does not consider any of its wholly owned operations in Canada to carry a 7ÜÍpÜÜþþEj/Ü7ij Ìjt «²/pj-óþe²/ljíÜe²þjEÖ²jó²íþó j Ì/þü²f /i7 j M/jf /iì /²²jþþ«jÖMüþþj/²7 M/²²7j policies and procedures. The employees within M/j/², /Eþ£ó²j ,²/þEÜpÍj7²íü²þE7jf /ijÜþj North America only, which has a low prevalence Ìjt «²/pj-óþe²/l jþjó fj/Ü7ij ÌjeMóþ²/þ£ÜóÜEÍj to Modern Slavery and a reasonably robust government response to Modern Slavery. t /² e²/ j M/jíó £þójf /iì /²²jóþ/í²óljþ þ7Ü7E7j Ìj7iÜóó²« j.MþóÜÜ²«jþþ«j²k,²/Ü²þ²²«jÜþ«ÜeÜ«Mþó7 j Alberici is broadly signed to the Building Trades in Ontario. These collective agreements apply þþjþ««ÜEÜ þþójó²e²ó j Ìþ þE/ ój²þ7M/ÜpÍjþóójf /ij Ü7jþþ//Ü²«j MEj£ljÖÜÍÖólj7iÜóó²«jþþ«jE/þÜþ²«j tradespeople.

We also have a number of internal controls designed to safeguard the rights of our employees. These include our internal policies and practices, including our recruitment, employee engagement and remuneration ,/þ²EÜ²²7 j M/j7,²þi9M,jþþ«jjÜþe²7EÜíþEÜ þ7j processes, our grievance resolution processes

Steps Taken in the Previous Year

Our operations and supply chain. These steps include, but are not limited to:

- » Developed and implemented due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour or child labour in our activities and supply chains.
- » Developed and implemented anti-forced-labour and anti-child labour contractual clauses.
- » Enhanced our supplier onboarding process to directly address potential concerns of forced or child labour.
- » Updated our Procurement Policy to require child labour practices in the operations and supply chains used in the provisions of any goods or services.
- » Prohibited forced labour and child labour in our activities and supply chains.

Next Steps

that will be implemented in the coming years including but not limited to:

- » Create a Supplier Code of Conduct which practices in the operations and supply chains used in the provisions of any goods or services.
- » Continue to evolve and expand our due

Approval and Attestation

This report was approved by the Board of Directors of Alberici Constructors Holdings, LLC on behalf of itself and each of the Alberici Reporting Entities.

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 óÛ7E²«j£ e² j £7²«j þjülijþ fó²«í² jþ«jÕþeÛþíj²k²/«Û7²«j 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.

For clarity, I have provided the attestation above in my capacity £7jþj«Û/²«E /jþ«j ìÛ²/j ìj Ujþ«jþ EjÛþjülij,²/7 þój«þ,þ«ÛEi j

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I have the authority to bind Alberici Constructors Holdings, LLC j
May 31, 2024

