

Forced Labour and Child Labour Report 2024

Eagle Builders LP

Introduction

This Report is made jointly by Eagle Builders LP and certain of its affiliates (collectively "Eagle", "we", "our" or "us"). Eagle operates in the construction industry and precast concrete manufacturing industry in Western Canada. While most of our products are sourced directly from Canadian subtrades or suppliers from Canadian sourced materials, we are currently increasing the sourcing of products from overseas manufacturers. Accordingly, we recognize these changes in practice may increase our exposure to the risks of forced labour or child labour while concurrently providing opportunity to more directly impact mitigation of that risk. We acknowledge that understanding and managing these risks requires a collaborative approach with our suppliers, our employees and external stakeholders.

This report outlines Eagle Builders' existing measures undertaken in the 2024 fiscal year and planned activities to prevent and mitigate the risks.

Reporting Context

Eagle Builders LP is a provincial registered limited partnership registered in the Province of Alberta. Certain affiliates are registered as Corporations in the Province of Alberta. This Report is made pursuant to the Act and was approved by the Directors of the General Partner Eagle Builders Inc.

Our Structure, Businesses and Supply Chain

Eagle Builders LP operates as a limited partnership as represented by its General Partner Eagle Builders Inc. and is hereafter referred to as Eagle. Eagle is affiliated with numerous corporations that are under the common joint control of the partners of Eagle Builders LP. Eagle undertakes construction projects throughout Western Canada usually utilizing precast concrete products produced in our facility at Blackfalds, Alberta. The supply chain includes sourcing skilled labour for construction projects and manufacturing operations in Canada, sourcing construction materials through Canadian subtrades and suppliers or on

occasion, other North American based suppliers. In the second half of 2024, Eagle's supply chain was expanded to include certain suppliers domiciled in Asia. Eagle's total imports value consisted of approximately \$10 million dollars of product.

Governance

Eagle is a closely held entity and governed by a board of directors. Responsibilities for compliance with laws and regulations are delegated to managers including finance, human resources, project management and manufacturing operations. Eagle maintains a culture of open communication between the senior management and all employees and in-house programs exist to allow feedback, suggestions and communication on areas of safety, quality control and constant and never-ending improvement. All communication submitted through the in-house programs is directed to senior management for review and consideration.

Understanding our Risk Exposure to Forced Labour and Child Labour

Eagle's greatest risk exposure to Forced Labour and Child Labor is through suppliers and the greatest risk comes from our supplier's procuring goods in higher-risk geographies and sectors. In 2024, Eagle continued to investigate the direct importation of construction materials from Asia and during the year entered into the first purchase agreements to import certain materials. Accordingly, Eagle continued on its path in 2024 to put in place internal policies and procedures that clearly communicate the need for supplier onboarding due diligence and communication, a culture of reporting suspicious activities or actual violations and educational training for employees and managers.

Supplier Risk Mitigation

Eagle mitigates its risk of exposure to Forced Labour and Child Labour by leveraging various processes to screen and monitor suppliers and subcontractors and limiting material transactions to approved vendors. A Forced Labour and Child Labour Policy was approved in 2024 and circulated to all employees to raise awareness of the issue. Subcontractors continue to be required to attend annual meetings to review their processes and procedures and Eagle is continuing to review processes to highlight the

issue of Forced Labour and Child Labour at the subcontractor annual meetings and in ongoing communications with subcontractors.

In addition, in 2024 Eagle commenced a review of additional opportunities to increase the scope of materials acquired directly from manufacturers and to reduce Eagle's reliance on third party suppliers. Eagle also commenced discussions with certain significant subcontractors on opportunities to integrate their supply chains with Eagle supply chains. Ultimately, Eagle continues to work to the goal of requiring significant subcontractors and suppliers to attest to having reviewed their own supply chains for potential exposure.

Finally, Eagle is committed to developing policies and procedures that identify best practices for implementation including screening our supplier list for entities that are subject to sanctions including the CFP-Forced Labour List, UFLPA Entity List and the list of companies involved in slave labour published by the Brazil Division of Surveillance for Eradication of Slave Labour of the Ministry of Labour. In 2025, Eagle will try to identify software solutions that will assist in automating the identification of suppliers that may be exposing Eagle to increased risk.

Prior to 2024, Eagle representatives physically attended certain production facilities of potential suppliers. In 2024, Eagle engaged Third Party Representatives (the "Representatives") in the countries of origin to assist them in mitigating the risk of Forced Labour and Child Labour exposure. Specifically, the Representatives were provided a copy of the Forced Labour and Child Labour Policy, were requested to physically attend any potential supplier production facilities and to further engage in communication with existing and new suppliers onboarded to determine their awareness of and compliance with international requirements to prevent Forced Labour and Child Labour. Suppliers were requested to provide evidence of compliance by providing evidence of monitoring by a recognized third party organization including AMFORI or to provide evidence of Corporate Policies that confirmed the organization was aware of the international restrictions on the use of Forced Labour and Child Labour. In 2024, Eagle did not identify any evidence of Forced Labour, Child Labour or loss of income to the most vulnerable families and no remediation measures were undertaken in 2024.

Training and Assessing Effectiveness

In 2024 Eagle focused on furthering an understanding of the potential risks of Forced Labour and Child Labour in our supply chain and communicating that understanding to our employees. The Eagle Forced Labour and Child Labour Policy is now included in our Employee Handbook and highlighted for all employees during onboarding. Additional time is spent reviewing the policy and communicating the risks during onboarding with certain employees who have increased exposure to interactions with procurement and our supply chain. In 2025, Eagle is committed to further review of the policies and procedures and will continue to provide training, awareness and identifying best practices for those employees involved in the supply chain procurement to ensure emerging risks are identified.

Report 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 for the entity or entities listed above. Based on my knowledge and having exercised due 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.

I have the authority to bind Eagle Builders LP as represented by its General Partner Eagle Builders Inc.



Kevin Kooiker
Director of the General Partner
Date: May 8, 2025