

Report on Our Commitment to the Fight Against Modern Slavery

Nelson Aggregate Co. (Nelson) (we, us, our) is committed to respecting human rights and stands against all forms of modern slavery (a term that includes forced labour and child labour). This Report is issued in accordance with Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) for the financial year ending April 30, 2024.

1. Our Structure, Business, and Supply Chains

Nelson is a Canadian privately-owned organization, headquartered in Burlington, Ontario, and is a leading provider of aggregates in Ontario. Our business activities involve quarrying, crushing and pulverizing limestone rock in our various limestone quarries, as well as extracting, crushing, washing and screening sand and gravel from our various sand and gravel pits. We are committed to providing our customers with superior quality quarry and gravel products for their construction projects, in a manner that is environmentally conscious and sustainable. Our business activities do not include importation of any goods.

Nelson has full ownership and control over a subsidiary business called Waynco Limited. Waynco Limited operates out of Cambridge, Ontario, but it engages in the same business activities as does Nelson, and is bound by each of Nelson's policies.

Nelson is also in an equal partnership for the ownership and control over another subsidiary called Halton Asphalt Supply Limited. This business operates an asphalt plant in a quarry in Burlington, Ontario.

Nelson also operates two numbered corporations, 546958 Ontario Limited and 2659691 Ontario Limited, which are the trusts that hold the land to which our quarries and pits are located.

2. Modern Slavery Risks in our Operations and Supply Chains

The nature of our business means that the majority of our workforce consists of skilled and experienced individuals operating within Ontario, and our inputs are obtained domestically in Canada. The raw materials we use are limestone, sand and gravel, which are naturally occurring in our various quarry and pits in Ontario, and which we extract from the land.

We obtain approximately 95% of all of our heavy equipment from major suppliers that are located within Canada, while the remaining 5% are purchased from major suppliers producing equipment in the United States of America. Accordingly, Nelson, its subsidiaries, and each of its suppliers, operate within locations that have robust and comprehensive labour laws that prevent against modern slavery risks.

We consider the overall risk that our business and supply chains have caused or contributed to modern slavery to be negligible, having regard to our skilled workforce and our inputs. However, there is a risk that our operations may be indirectly linked to

modern slavery as a result of our business activities. Such risk may exist in the outer tiers of our supply chain supporting the production of the heavy equipment we use to extract our aggregates.

3. Actions Taken to Assess and Address Modern Slavery Risks

Nelson and its subsidiaries adopt the same policies and processes in all locations, and therefore we have provided a single, consolidated description of actions taken to assess and address modern slavery risks in this Part 3.

We have assessed the risk of modern slavery in our supply chains by considering the risks that may be present with our active suppliers. The factors considered to identify exposure to risks of modern slavery include:

- Industry-related risks
- Product-related risks
- Country-related risks
- Complexity of the supplier's supply chain

The reasonable due diligence process conducted did not reveal any known cases of modern-day slavery among our suppliers.

4. Measures Taken to Remediate Modern Slavery, or the Loss of Income in Relation to Modern Slavery

Nelson has not identified any known incidents or significant risks of modern slavery in our activities and supply chains. The issue of remediation is therefore not considered to be applicable. Furthermore, we have also not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of modern slavery in our activities and supply chains.

We will nevertheless remain vigilant in this regard. If we do identify incidents of forced labour within our activities or supply chains, we will consider the appropriate remediation strategies in compliance with international standards.

5. Training

Nelson does not provide employee training that specifically addresses modern slavery.

6. Assessing the Effectiveness of our Actions

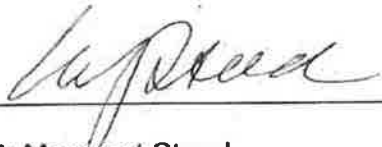
For the upcoming financial year, Nelson is committed to developing and implementing a policy and procedure relating to modern slavery. Accordingly, Nelson has yet to take any measures to assess the efficacy of this measure.

7. Conclusion

We are committed to preventing and eradicating all forms of modern slavery in Nelson's procedures and supply chains. We will continue to regularly review our processes, practices and policies in order to ensure this goal is being met.

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 entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest in accordance with subparagraph 11(4)(b)(ii) of the Act 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 Nelson Aggregate Co.



NAME: Margaret Steed
TITLE: Director
Dated: May 27, 2024

