

Consolidated Annual Report Pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Reporting Entities:

- **Traylor – Aecon General Partnership (TAGP)**
- **Traylor Infrastructure Canada, ULC (TIC)**

Reporting Period: January 1, 2024 – December 31, 2024

Date of Report: May 27, 2025

Submitted To: Public Safety Canada

Approved By: Christopher D. Hebert

Title: Vice President

1. Structure, Activities, and Supply Chains

Traylor – Aecon General Partnership (TAGP) is an unincorporated joint venture between Traylor Infrastructure Canada, ULC (TIC) and Aecon Constructors, a division of Aecon Construction Group Inc. (Aecon), established to construct a major tunnel infrastructure project in Vancouver, British Columbia. TAGP does not employ personnel directly but operates using staff seconded from its joint venture partners, including TIC.

Traylor Infrastructure Canada ULC (TIC) is a Canadian company wholly owned by Traylor Bros., Inc., a U.S.-based heavy civil construction firm. TIC manages Traylor’s Canadian operations, provides administrative and technical support, and acts as managing partner for TAGP.

TAGP was formed as a special purpose vehicle to perform work in relation to “RFP No. 18-0484 – Construction – Second Narrows Water Supply Tunnel Burrard Inlet Crossing,” dated April 12, 2018 (the “**Contract**”), with Greater Vancouver Water District (“**GVWD**”) to construct the new water supply tunnel on behalf of GVWD (the “**Project**”). The Project involves the replacement of three existing water mains and construction of tunnel shafts and a 1.1-kilometer tunnel crossing under the Burrard inlet from north Vancouver to the City of Burnaby (the “**Work**”). The Project is located in British Columbia, and TAGP does not have any material business activities outside of British Columbia. TAGP’s activities relate principally to those connected to the Project, and other activities that are ancillary to that purpose.

The supply chains for both TAGP and TIC primarily consist of Canadian and international subcontractors and vendors providing construction services, raw materials, fabricated components (such as concrete and steel tunnel liners), and specialized equipment. While neither entity directly imports goods into Canada, some goods procured through subcontractors may originate from international sources.

2. Policies and Due Diligence Processes

As of the end of the 2024 reporting period, neither TAGP nor TIC had formal written policies specifically targeting forced labour or child labour in their supply chains. No structured due diligence processes were in place to identify or mitigate such risks. Subcontractor and supplier engagements were governed by standard industry contract terms, which generally include legal compliance obligations, but no tailored forced labour or child labour screening mechanisms were used.

TAGP requires the following clause in its subcontracts: “Suppliers must abide by applicable employment standards, labor, non-discrimination, and human rights legislation.” TAGP requires the following clause in its purchase orders: “Seller shall not engage, actively or passively, nor directly or indirectly in any form of bribery, in any violation of basic human rights of employees, or any child labor.” Additionally, in relation to the Second Narrows project, TAGP utilizes the Code of Conduct and Integrity & Compliance Program of TIC’s parent company.

The Code of Conduct mandates compliance with all applicable laws. The following elements of the Integrity & Compliance Program support TAGP’s commitment to ethical sourcing and compliance in support of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”):

a. Business Conduct and Ethics Policy

The Company’s Ethics and Compliance Policy emphasizes full compliance with applicable laws and regulations and a culture of integrity. This includes:

- Promoting ethical conduct in all business dealings.
- Prohibiting illegal, dishonest, or unethical behavior.
- Maintaining accurate accounts, books, and records, which supports traceability and transparency in supply chains.

This ethical foundation aligns with the Act’s goals of transparency and accountability in operations and supply chains.

b. Contract Payment and Claims Procedure

This policy promotes accuracy and truthfulness in all payment and claims submissions. It requires:

- Verification that all requests for compensation are supported by accurate data.
- Detailed documentation and review procedures.

These practices help prevent financial transactions that could mask unethical labor practices.

c. Equal Opportunity and Nondiscrimination

This policy outlines nondiscrimination and workplace fairness principles that help ensure labor is employed in a just and lawful manner. While not directly addressing supply chains, this culture of respect for human rights is foundational for broader ethical compliance efforts.

TAGP provides an anonymous and confidential reporting mechanism which allows individuals to report any concerns to an independent party: [Traylor Incident Reporting](#).

TIC and TAGP have not received any allegations or reports of forced or child labour related to their activities or their first-tier vendors.

3. Risk Assessment and Management

No formal risk assessment regarding forced or child labour was conducted during the 2024 reporting period. That said, the entities recognize that infrastructure projects using global supply chains may carry indirect exposure to such risks—particularly for imported materials originating from higher-risk jurisdictions.

Given the domestic focus of TAGP’s contract and the structure of procurement through reputable suppliers, the perceived risk in 2024 was viewed as low, but visibility into sub-tier supply chains was limited.

4. Measures Taken to Remediate Risks

TAGP and TIC did not undertake any active measures in 2024 to remediate or mitigate risks related to forced or child labour in their supply chains. No audits, contractual amendments, or supplier certifications were implemented during the reporting year.

5. Training

No training regarding the identification or prevention of forced or child labour was provided to seconded or administrative personnel in 2024.

6. Assessing Effectiveness

Because no formal compliance program was in place during 2024, TAGP and TIC did not have systems in place to monitor or assess the effectiveness of any measures against forced or child labour.

7. Commitment to Future Action

TAGP and TIC are committed to developing and implementing a practical and proportionate compliance framework in future reporting years. Planned good faith steps for the 2025 reporting period include:

- Reviewing existing procurement practices for opportunities to incorporate forced labour and child labour due diligence;
- Evaluating whether existing standard agreements can be updated to include more specific human rights protections;
- Consulting with legal and compliance advisors to draft an initial Supplier Code of Conduct;
- Training internal stakeholders—particularly procurement and leadership teams—on the requirements of the Act;
- Preparing a 2025 report that reflects meaningful progress.

The entities will prioritize efforts based on operational risk, supply chain complexity, and resource availability. These actions will be developed under the oversight of TIC's management and in coordination with its U.S. parent, Traylor Bros., Inc.

8. Website Publication

This report will be published on the website of Traylor Bros., Inc. at www.traylor.com and made available to any stakeholder upon request by contacting Steven S. Owen, General Counsel, at sowen@traylor.com.


Approval and Attestation

This report was approved by governing body of each reporting entity pursuant to section 11(4)(b)(i) of the Act. 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 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 as an officer of Traylor Infrastructure Canada, ULC, managing member of Traylor Aecon General Partnership, and not in my personal capacity.

Name: Christopher D. Hebert

Title: Vice President of Traylor Infrastructure Canada, ULC, managing partner of Traylor – Aecon General Partnership

Signature: 
Christopher Hebert (May 27, 2025 09:47 PDT)

Date: May 27, 2025






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Final Audit Report

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