

Yellowline Asphalt Products Ltd.

**Modern Slavery Act Annual Report
May 20, 2025**

Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) requires that businesses review their processes and state actions they have taken during the fiscal year to identify, prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This report prepared by Yellowline Asphalt Products Ltd. (“**Yellowline**”) refers to Yellowline’s 2024 fiscal year, which ended on December 31, 2024, and describes steps taken by Yellowline in 2024.

Yellowline is committed to acting with integrity and ethically in all of its business transactions. Included in that commitment is working collaboratively with its suppliers and contractors to identify and reduce the risk of forced or child labour occurring within its supply chain network. Yellowline expects its business partners and suppliers (as well as their respective contractors, agents, subcontractors and sub-agents) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

A. Yellowline Structure, Activities and Supply Chains

Structure

Yellowline is a privately owned company formed under the laws of the Province of Ontario as a fifty-fifty joint venture between Dufferin Construction Company, a division of CRH Canada Group Inc., and Green Infrastructure Partners Inc. Its head office is located at 100 Commerce Valley Drive West, Markham Ontario L3T 0A1.

Activities

Yellowline manufactures asphalt cement and has one facility located within the Hamilton Port Authority. Yellowline’s asphalt terminal produces a full range of neat and polymer modified asphalt cements capable of meeting Ministry of Transportation of Ontario, municipal and regional specifications. Liquid anti-strip and warm mix additives may be added at the terminal to meet customer needs.

Supply Chains

Yellowline is committed to respecting human rights and upholding ethical business practices in all aspects of its operations, which includes its relationships with its suppliers. Yellowline’s suppliers provide a variety of goods, including but not limited to base grade asphalt cement and polymers, to facilitate its business dealings and are primarily based in Canada. Yellowline aims to work with reputable, well-established suppliers and is continuously evaluating its relationships with its key suppliers to ensure its short- and long-term goals are being met, including respecting and abiding by the applicable human rights and employment standards laws.

B. Policies and Due Diligence Processes

Yellowline utilizes a formal policy, code of conduct and a diligent governance framework to address the risk of modern slavery, to protect human rights and to create a safe and inclusive work-environment for all employees. Yellowline's relevant policies and due diligence and training processes are described below.

Human Rights Policy

Yellowline has a Human Rights Policy (the "**HR Policy**") that applies to all personnel who are engaged to provide services to Yellowline. In the HR Policy, Yellowline prohibits the following in all of its operations:

- the use of all forms of forced or child labour;
- any form of human trafficking or slavery; and
- the hiring of individuals that are below the age of majority, as defined by applicable law, for positions involving potentially hazardous work.

The HR Policy further establishes that Yellowline will not engage in any activities that encourage human rights abuses or that support trafficking in persons or the use of child or forced labour.

Code of Ethics and Business Conduct

Yellowline has adopted a Code of Ethics and Business Conduct (the "**Code of Ethics**") that applies to all directors, officers, employees and persons acting as authorized agents of Yellowline. The Code of Ethics sets out Yellowline's commitment to conducting its business with integrity, honesty and respect, in compliance with all applicable governmental laws, regulations and policies, and in a manner that preserves its reputation and deters unethical behavior and wrongdoing. The Code of Ethics provides an overview of the requirements, standards and expectations to guide all Yellowline representatives in carrying out their duties for, dealings with, and when acting as a representative in any capacity of Yellowline.

All Yellowline representatives are required to become familiar with the Code of Ethics and apply its principles in the performance of their duties and responsibilities to Yellowline. All representatives have a duty to timely report any conduct that may be in violation of the Code of Ethics and to seek advice if they have any questions whatsoever about the application of the Code of Ethics to any particular circumstance or situation that a Yellowline representative may face.

C. The Risk of, and Steps Taken to Assess and Manage, Forced Labour and Child Labour in Yellowline's Business and Supply Chains

Upon review of Yellowline's business and supply chains, which are primarily local, it was determined that such business and supply chains carry a low risk of forced or child labour.

In fiscal 2024, Yellowline took the following steps to assess and reduce the risk of forced labour or child labour in its supply chains:

- reviewed the form of supplier contract to ensure compliance with the provisions and obligations of the HR Policy; and
- added audit rights to supplier contracts where determined necessary.

D. Remediation Measures

No incidents of child or forced labour were found in fiscal 2024. Further, Yellowline has determined that the risk of forced or child labour in its business and supply chains is low. Accordingly, Yellowline did not take any corresponding remedial measures in fiscal 2024.

E. Training

Completed May 2025.

F. Assessing Yellowline's Effectiveness

A formal assessment process with regards to Yellowline's effectiveness in ensuring that forced labour and child labour was not being used in Yellowline's business and supply chains was not implemented in 2024. However, Yellowline regularly undertakes audits and reviews of various aspects of its business operations to ensure the effectiveness of its business practices and compliance with all applicable laws (including those in relation to forced and child labour) are in scope for these assessments. Furthermore, Yellowline continually monitors and improves its company policies as any deficiencies are discovered.

Approval and Attestation

This report has been approved by the Board of Directors of Yellowline Asphalt Products Ltd.

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 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.



John MacKay
General Manager, Yellowline Asphalt Products Ltd.
May 27, 2025
I have authority to bind Yellowline Asphalt Products Ltd.