

SPRINGHILL MANAGEMENT LIMITED

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FREDERICTON, NB
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Springhill Management Limited in conjunction with its related subsidiaries: Springhill Administration Limited, Springhill Construction Limited, Springhill Infrastructure Limited, and Springhill Equipment Limited (collectively, the “**Springhill Group**”) is committed to preventing forced labour and child labour (“**Modern Slavery**”) in its corporate activities and supply chains.

This statement outlines the steps taken during its previous financial year (April 1st, 2023 to March 31st, 2024) (the “**Reporting Period**”), to identify and address risks of Modern Slavery within our organization and supply chains. Forced labour and child labour are incompatible with our values. These include professionalism, integrity, and responsibility. We fully support the government’s objective to eradicate these unlawful forms of labour.

Our Organization

The Springhill Group operates offices and commercial quarries throughout the province of New Brunswick. The Springhill Group also works in heavy civil construction, asphalt paving, road building, commercial building construction and rock quarry mining operations.

Risk and Remediation in Our Supply Chains

The Springhill Group is a proud producer, supplier and distributor of goods within the construction industry in New Brunswick. In addition to this, we work collectively with a broad range of suppliers, producers, and manufacturers. In the current reporting period, we have not yet have assessed or considered the potential risks associated with Modern Slavery; however, we have committed to exploring a risk-based approach for the next Reporting Period.

Assessing Effectiveness

In the current Reporting Period, the Springhill Group began assessing its effectiveness by partnering with external organizations (*i.e.*, professional advisors) to begin reviewing our internal procedures related to identifying Modern Slavery. Through ongoing planning sessions, we are working to develop forward-looking strategies that we can implement to assess our business to assist us in adequately identifying and responding to suspected instances of Modern Slavery.

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Policies

We operate the following policies that describe our approach to assist us in identifying forced labour and child labour risks in our effort to proactively mitigate Modern Slavery within our organization:

Health and Safety Program – The program highlights steps which minimize risks associated with our operation to ensure a safe, healthy, and productive workplace.

Employee Code of Conduct – The employee code clearly outlines the actions and behaviours expected of employees when representing the Springhill Group throughout Canada and internationally (when applicable). Particularly, we strive to uphold the principles of our code of conduct to the highest standards when managing our supply chain.

Due Diligence

There have been no investigations to date.

Remediation of Loss of Income

The organization did not identify any instances of forced or child labour within the organization or its supply chain.

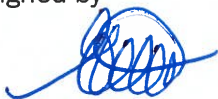
Training

In response to the enactment of the Act, our senior management have participated in ongoing strategic planning meetings with our professional advisors to discuss how the Springhill Group can implement strategies and properly educate our employees to ensure that our organization is well equipped to identify and address issues surrounding Modern Slavery. Training regarding forced labour and child labour will be mandatory for senior management in the next Reporting Period.

Board Approval

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 Period.

Signed by



Geoff Colter

On Behalf of the Board of Directors of the Springhill Group having the authority to bind the entities listed herein.