



# Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

May 29, 2026

## Introduction

Clearway Amelioration Inc. and its subsidiaries listed below (collectively “Clearway” or the “Company”) are committed to respecting internationally recognized human rights and complying with all applicable laws throughout its global operations, as noted in our Human Rights Statement. Consistent with this commitment, Clearway strives to prevent, identify, and eliminate modern slavery, including forced labor, child labor, and human trafficking from its global operations.

In this report, prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bil S-211)*, Clearway summarizes both its current state and planned actions to improve its response across its operations to address modern slavery risks. This statement relates to our actions and activities during our fiscal year October 1, 2024, to September 30, 2025.

## Organizational Structure, Activities and Supply Chains

As a diversified construction company, Clearway operates in different sectors, providing each with a unique set of services through knowledge, experience, and value engineering. The Company leverages its internal management, equipment, and haulage services to deliver projects across the heavy civil, dry utility, residential and commercial design build sectors with a project portfolio that extends across Canada. The Company's customers are mainly Canadian government agencies and other construction companies.

This report covers Clearway Amelioration Inc. and the following wholly owned subsidiaries, which collectively meet the reporting criteria set out in the Act: **Clearway Construction Inc. (or “CCI)**, **Clearway Utilities Inc. (or “CUI”)**, **Clearway Equipment Limited (or “CEL”)**, **Sterling Haulage Limited (or “SHL”)**, **Signature Communities Inc. (or “SCI”)**, **SynrgGroup Construction Partners Inc., and Clearway Payroll Management Inc. (or “CPMI”)**.

Clearway is a privately held company. Clearway and its predecessor companies have carried on business across Canada since 1973. Our mission is simple – to transcend the limits of construction and deliver sustainable communities and infrastructure excellence. It's something we strive for every day through honest work, genuine care and extreme passion.

We are based in Maple, Ontario with satellite operations in the Greater Toronto Area and Surrey, BC.



Clearway had 463 full and part-time employees as of September 30, 2025, comprised of: 294 unionized, hourly employees; 24 non-union, hourly employees; 145 salaried employees (full and part-time); and 5 fixed-term employees. This number is indicative of the size of the directly employed workforce, but the total number of employees at any time throughout the year varies as the Canadian construction industry is seasonal in nature, with less work performed in the winter and early spring months, and it may also vary depending on the number and nature of ongoing projects. These figures do not reflect the total number of jobs created by Clearway as we may subcontract work to other construction companies or third-party contractors who employ their own workforce.

Clearway's ownership group and board of directors (the "Board") is committed to fostering a governance structure that supports open communication, trust, candour and healthy debate as part of the corporate decision-making and oversight processes.

### **Activities and Supply Chain**

Clearway expects suppliers, subcontractors, contractors, and consultants that have direct contractual relationships with Clearway ("Direct Suppliers") to conduct all their business transactions in a manner that respects human rights, and in compliance with all applicable laws including but not limited to applicable forced labor and child labor laws.

### **Procurement of Construction Equipment, Services and Materials**

Clearway procures construction equipment, services, and materials through a network of primarily Canadian and US-based Direct Suppliers. However, the manufacture or procurement of certain specialized goods may take place outside of Canada, particularly for items required to meet client project specifications.

On Clearway's self-performed projects, construction services and materials are procured directly by the local project management team. Required construction services and materials will vary depending on the project scope and include such items as: reinforced steel, concrete, aggregates, fuel, electrical and mechanical equipment, industrial consumables and other types of common construction materials. Specialty construction equipment may be rented through local Direct Suppliers. Activities such as wet or dry vacuum excavation or crane operation may be procured locally or performed directly by Clearway's employees.

At the time projects are tendered, Direct Suppliers that are subcontractors are identified to perform specific work segments. These subcontractors may source and supply construction materials or services or perform work directly through the subcontractor's own labour force. The nature of the work outsourced to a subcontractor will vary depending on the scope of the project.

### **Policies and Due Diligence Processes in Relation to Forced and Child Labour**

**a. Policies:** The Company implements the following policies that describe its approach to addressing modern slavery risks:



**Business Conduct and Ethics Policy.** The Company's Code makes clear to employees the actions and behaviour expected of them when representing the Company and acting through day-to-day dealings. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when in its operations and in its dealings with partners, competitors, customers and suppliers alike. This policy has been updated for the fiscal 2025 year.

**Supplier Diversity Policy.** As allowed under Canadian applicable law, the Company's Diverse Suppliers program aims to support businesses that provide goods, services and materials owned by an individual or group recognized as being from one or more of the following communities: Female, Visible Minority/BIPOC, First Nations/Inuit/Metis, LGTBQ2+, Disables, or New Canadian/Skilled Immigrant/Foreign Trained Professional. As an organization we believe that our Direct Suppliers in Canada should be representative of the communities in which we operate. and as an extension of our commitment to ensuring a barrier and bias-free approach to employment and people management.

In addition to the aforementioned policies, Clearway has developed for rollout in the new 2025 fiscal year the following additional policies to support our commitments to assess and address modern slavery and human trafficking risks in its business and supply chain:

**Supplier Code of Conduct.** The Company is committed to ensuring that its Direct Suppliers adhere to the highest standards of ethics. Direct Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act within the law in their use of labour. This includes freedom of association and collective bargaining. The Company works with Direct Suppliers to ensure that they meet expectations. However, serious violations of the Company's Supplier Code of Conduct will lead to the termination of the business relationship. As part of this policy's development and implementation, these requirements will be incorporated into all pre-construction contractual documentation and subcontractor agreements.

Before becoming an approved Direct Supplier to Clearway and/or Clearway-led projects, Direct Suppliers, including subcontractors, must complete a pre-qualification process designed to understand their policies and processes addressing modern slavery risks. This process will allow Clearway to monitor Direct Suppliers identified as high-risk.

**Reporting Policy.** The Company encourages all its stakeholders, including workers, customers and other business partners to report any concerns related to its direct activities, or supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's reporting procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Any stakeholder who has concerns can use our confidential ethics hotline to confidentially report a potential concern by telephone or web form which is posted on its website.

**Anti-Bribery and Anti-Corruption Policy.** Clearway's Anti-Bribery and Anti-Corruption policy reflects the Company's core values and business practices with respect to competition and transparency and outlines the expectations of employees as well as its subcontractors, contractors, consultants and any suppliers of goods and services when conducting business with, for or on behalf of the Company.



**Human Rights Statement.** The Company is committed to respecting the internationally recognized human rights principles aimed at promoting and protecting human rights in the countries in which we operate. This includes compliance with the legal framework established and an expectation of our business partners and Direct Suppliers to do the same.

## **Forced Labour and Child Labour Risks and Management**

Clearway's Canadian operations are low risk for forced and child labour. This is due in part to the overarching legislation in Canada at a federal and provincial level where our workforce and Direct Supplier network largely resides, as well as any additional compliance obligations associated with Clearway's government contracts. Further, Clearway's Direct Suppliers in the U.S. are covered under equivalent federal and state legislation addressing modern slavery risks.

Given that the majority of Clearway's hourly workforce in Canada is unionized, as a Company, considerable effort is expended for all new hires to verify each individual's background information, including, but not limited to:

- Collection of government-issued photo identification.
- Collection of Social Insurance Number (or "SIN") and/or authorized government; documentation showing the SIN and individual's registered first and last name.
- Verification of SIN validity through Service Canada; and,
- Where applicable, receipt of individual union clearance card(s) showing union registration information.

Clearway has made minimal use of third-party employment agencies but requires that Direct Suppliers of any workers through an agency maintain similar practices as outlined above for the verification of any supplied labour, and at all times comply with the applicable law.

Clearway's employees are recruited directly by the Human Resources department and, for hourly field roles by the Operations teams, through Company-sponsored advertising of job postings, campus recruitment events, employee referrals, third-party recruiters providing introductions or assignment (where applicable) by union hiring halls.

## **Remediation Measures**

Clearway is committed to providing remediation for any confirmed instances of forced or child labor in its operations or in the operations of its Direct Suppliers. At the time of this report, for the applicable time period, Clearway has not identified any instances of forced or child labour in its operations or in the operations of its Direct Suppliers. As such, no remediation measures have been required or taken to date. The Company will continue to assess its operations or in the operations of its Direct Suppliers and consider appropriate means of remediation for forced or child labour should issues arise.

## **Remediation of Loss of Income**

At the time of this report, Clearway is not aware of any instance where its efforts to address the risk of forced or child labour in its operations or in the operations of its Direct Suppliers have failed or contributed to a loss of income for vulnerable families.



## **Training and Continued Education**

As part of its implementation of its new Business Code of Conduct, Reporting Policy, Anti-Bribery and Anti-Corruption Policy, Supplier Code of Conduct, and Human Rights Statement, Clearway will undertake to train employees on each policy including its meaning, content and implications for its business day-to-day, in addition to offering training refreshers. As part of this training, content will be developed to include awareness and prevention of modern slavery issues.

## **Measuring Effectiveness**

At the time of this report, Clearway has not yet developed a formal process to measure the effectiveness of its efforts to mitigate and prevent the use of forced and child labour risks beyond a periodic review of its own operations and the operations of its Direct Suppliers. Where Direct Suppliers are identified as having a higher potential risk of non-compliance with Clearway's Supplier Code of Conduct and other efforts to mitigate forced or child labour, formal reviews of those specific firms and/or individuals will be conducted. As Clearway's policies mature and processes grow in this area, efforts around development of a more formal process including regular Board review and reporting will be considered. We recognize that our review and assessment of our actions to identify and address any modern slavery risks in our operations and in those of our direct Suppliers will be an ongoing and evolving process that we are committed to continue to build upon.

## **Approval and Attestation**

This report was reviewed and approved on behalf of the Clearway Board on May 29, 2026, pursuant to section 11(4)(b)(ii) 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 have exercised reasonable 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 Clearway Amelioration Inc.

**Anthony Di Battista**  
President  
May 29, 2026