

TURNER

Fighting Against Forced Labor and Child Labor in Supply Chains Act

Annual Report — Fiscal Year 2025

Reporting Period: January 1, 2025 to December 31, 2025

INTRODUCTION

This report is published pursuant to the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (the "Act") and addresses the period from January 1 to December 31, 2025 ("FY2025"). This report is made on behalf of Turner Construction Company and its two Canadian Subsidiaries "Canadian Turner Construction Company" and "Clark Builders" (collectively, "Turner".)

At Turner, our foundation is built on a commitment to safety, integrity, and ethical business conduct. Turner rejects any form of modern slavery, forced labor, child labor, or human trafficking within our business and supply chains. We expect all employees, subcontractors, and business partners, including subsidiaries and joint ventures, to uphold the same standards We aim to investigate and address all breaches of these expectations that are brought to our attention.

OUR STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN

Structure

The Canadian Turner Construction Company was incorporated in New Brunswick in 1951.

Clark Builders was incorporated in Alberta in 2003 and was acquired by Turner in 2012.

These entities are wholly owned subsidiaries of Turner..

As of December 31, 2025, Turner employed 15,867 employees, 951 of which work in our Canadian offices in Vancouver, Toronto, Edmonton, Calgary, Yellowknife, Kelowna, and Red Deer, as well as our various projects.

Activities

Turner is a leading general contractor and construction management company providing global construction services including services in Canada. Canadian Turner Construction Company specializes in delivering healthcare, data centers, commercial office buildings, tenant fit-outs, and infrastructure upgrades. Clark Builders specializes in projects in the following sectors; building retrofits and tenant improvements, cultural & community, data centers, education, energy, resources & utilities, government & public services, healthcare and more. This work is for both public and private sector clients.

Supply Chain

Turner's supply chain consists of subcontractors, vendors, and service providers (hereinafter "direct suppliers") engaged to support project delivery and business operations. In FY2025, Turner's Canadian Operations worked with approximately 1,600 direct suppliers and subcontractors. Key areas of focus included:

- Subcontractors across trades such as sitework, concrete, structural steel, roofing, glazing, MEP, and drywall.
- Labor — direct hire and through subcontractors
- Professional services including design, engineering, and consulting
- Materials and commodities such as lumber, steel, concrete, glass, and mechanical/electrical equipment.
- Insurance and technology.

The majority of Turner's supply chain at Tier 1 is North American based.

RISK OF FORCED LABOR AND CHILD LABOR IN OUR OPERATIONS AND SUPPLY CHAIN

Turner recognizes that the construction industry carries inherent risks associated with forced labor and child labor, particularly within certain segments of the labor supply chain and in the sourcing of materials. One key sector that may present elevated risk is raw material supply chains involving imported goods.

Turner manages these risks through a combination of policies, due diligence processes, contractual obligations, and employee training, as described in this report.

OUR POLICIES AND DUE DILIGENCE PROCESSES

Policies

Code of Conduct

Turner requires all employees to comply with its *Code of Conduct*, which sets out Turner's expectations for ethical and lawful behavior. This policy outlines the ethical standards all employees must follow, covering areas like conflicts of interest, anti-bribery, accurate recordkeeping, and data protection. It emphasizes a zero-tolerance culture for violations, a duty to report misconduct, and strong anti-retaliation protections for those who report. Annually, all employees are required to complete training in Ethics and Compliance, including the Code of Conduct.

Human Rights Policy

Turner's Human Rights Policy commits the company to respecting and protecting human rights across its global operations and supply chain, in alignment with major international standards including the UN Guiding Principles on Business and Human Rights. It covers human trafficking, worker protections, anti-discrimination, forced/child labor prevention, modern slavery and community rights, with anonymous reporting channels and strong anti-retaliation protections for those who speak up or report misconduct.

Code of Conduct for Business Partners

Turner requires all suppliers, whether foreign or domestic, to comply with the Turner Code of Conduct for Business Partners. This code rejects the use of forced labor and child labor and requires business partners to uphold human rights, maintain fair working conditions, and comply with applicable laws. Acceptance of this code is required as a condition of all contractual agreements with Turner.

Whistleblower / Reporting Mechanisms

Turner maintains reporting channels that allow employees and others outside the company to raise concerns about potential violations. These include direct reporting to management, HR, and a confidential ethics helpline. Employees can report issues 24 hours a day, 7 days a week to Turner's Confidential Reporting System, by contacting: 1-888-738-1924 or turnerconstruction.navexone.com/intake. Reports may be made anonymously, and Turner prohibits retaliation against individuals who report concerns in good faith.



Due Diligence Processes

Hiring Process

Turner takes all reasonable measures to avoid hiring ineligible employees. During the onboarding process, all new hires are required to present identification verifying their age, identity, and eligibility to work. Turner follows all required employment verification processes in accordance with applicable laws.

Procurement and Supplier Qualification

Turner's procurement prequalification process includes an online platform with a questionnaire including topics such as financial stability, safety record, business history, employment numbers, trade information, experience history, references, bonding, insurance, and legal compliance. Turner's contracts with subcontractors and suppliers include provisions requiring compliance with applicable human rights, forced labor, and child labor laws.

Risk Analysis — Two-Step Approach

The process begins with an annual risk analysis using both a top-down abstract analysis and a bottom-up concrete analysis. The abstract analysis evaluates country-level risks using public indices (Modern Slavery Index, Global Gender Gap Rating, etc.) to map the human rights landscape in each operating region. The concrete analysis then engages relevant entities directly via questionnaires to identify, assess, and prioritize specific risks based on probability of occurrence and severity of impact.

Supplier Prioritization

Each year Turner conducts a risk analysis for all suppliers receiving cumulative contracts exceeding \$1 million (USD or CAD) in a calendar year.

Suppliers flagged in the abstract analysis are subjected to the deeper concrete risk analysis to gather further information, after which targeted preventive or remedial measures may be imposed.

Preventive Measures

Key tools include integrating human rights, environmental, and safety questions into supplier prequalification, as well as requiring vendors to comply with the Turner Code of Conduct for Business Partners and Turner Human Rights Policy, and to flow down these requirements to their supply chain partners.

The Procurement, Legal, and Compliance departments work together to conduct and oversee this due diligence.

REMEDIATION MEASURES

In FY2025, Turner did not identify any confirmed incidents of forced labor or child labor in its supply chains or operations.

Turner did identify a supplier with a potential risk associated with mica sourcing, in particular the risk of child labor and forced labor in artisanal mica mines in Jharkhand and Bihar, India, and Madagascar — regions where regulatory enforcement is limited and child labor in mica mining is well-documented. Mica is present in electrical and mechanical equipment procured through Turner's supply chain. This investigation is ongoing, and Turner is working to further identify suppliers providing mica-containing electrical components as elevated-risk and is engaging them for further transparency.

Turner has not identified any loss of income to vulnerable families resulting from its measures to prevent and address forced labor or child labor.

Turner is committed to implementing appropriate remediation measures to improve the situation and implement enforcement of the preventative measures within our business and supply chain, should any future non-compliance be substantiated. Such measures may include:

- corrective action plans, enhance due diligence and/or monitoring of suppliers;
- actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support;
- actions to prevent forced labour or child labour and associated harms from reoccurring;
- grievance mechanisms; and
- formal apologies.

TRAINING

Turner provides training to all employees on issues related to forced labor and child labor. During FY2025 this included: Mandatory web-based annual training on the Code of Conduct, Ethics and Compliance, and Human Rights. The Human Rights Training was internally developed to educate on the policy, and covers, forced labor, child labor, modern slavery, and human trafficking.

Turner's completion rate for this training for 2025 was 99.6%.

ASSESSING OUR EFFECTIVENESS

Turner assesses the effectiveness of its policies and processes through the following mechanisms:

- The cross-functional Human Rights Committee meets quarterly to review human rights activities and concerns.
- Performance indicators tracked include employee training completion rates, number of reports received and resolved through the whistleblower mechanism.
- Turner is certified under Anti-Bribery Management System (ISO-37001), and Compliance Management System (ISO-37301).

- Significant suppliers are assessed first through a third-party assessment, with high-risk suppliers subject to additional measures.

APPROVAL AND ATTESTATION

This Report was approved by the executive leadership team of Turner Construction Company pursuant to subparagraph 11(4)(b)(i) of the Act and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on Turner's company website at www.turnerconstruction.com

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 or 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.

Date: **May 29, 2026**

Signed by:



Patrick D. Blake

Chief Compliance Officer

I have the authority to bind Clark Builders and Canadian Turner Construction Company