

2023

# Modern Slavery Report

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Date:

May 28, 2024

## 1.0 INTRODUCTION

Kontzamanis Graumann Smith MacMillan Inc. (collectively, “KGS Group”, “we” “us” or “our”), recognizes the critical role of the private sector in ending modern slavery. We are a good corporate citizen and respect human rights. We take a risk-based approach within our own business to identify, prevent, mitigate and account for our impacts on human rights. We are committed to continuously learning how our enterprise can have a positive impact in the efforts to fight against modern slavery and improving our internal policies and processes to address the risks of modern slavery. KGS Group is therefore publishing the details of the steps it has taken in 2023 to ensure that modern slavery is not taking place in our own operations and supply chains.

This report relates to our efforts during the reporting period from July 1, 2022 to June 30, 2023, unless otherwise indicated herein and where required by the context.

## 2.0 OUR STRUCTURE, ACTIVITIES & SUPPLY CHAIN

### Structure and Activities

KGS Group is an employee-owned, multidisciplinary engineering consulting firm serving clients throughout North America. KGS Group, with 620 employees located across Canada, is accessible to many across North America. KGS Group is a Canadian corporation existing under the *Canada Business Corporations Act*. KGS Group’s head office is located at 3rd Floor - 865 Waverley St, Winnipeg, Manitoba.

We are dedicated to excellence in engineering and project management. Our highly experienced team of engineers, scientists and technologists provide a complete range of engineering services in the energy, infrastructure, industrial, environment, buildings and spaces markets.

### Our Supply Chains

Our supply chains include professional consulting services firms acting as sub-consultants/contractors (in the delivery of professional services and works), individual sub-consultants, suppliers of equipment used for our field projects, goods and equipment in our offices, IT equipment and services, landlords and various ancillary travel and professional services. These groups are referred to as “vendors” in our integrated management system. The terms and conditions of the agreements executed with our subconsultant/subcontractor indicate that they would comply with all applicable laws, regulations, codes and standards, including human rights, health and safety and employment legislation.

Our supply chains are mostly located in North America. We rarely have overseas supply chains, but we recognize that they may have their own suppliers importing goods from overseas locations.

## 3.0 POLICIES

The following KGS Group policies are related to modern slavery.

### Employment Equity

KGS Group is an Employment Equity Employer who is committed to fostering a culture of respect, equality, and diversity. We adhere to Canada's *Employment Equity Act*, an act that was put in place to achieve equality in the workplace. Furthermore, KGS Group instituted positive policies for the hiring, training, retention and promotion of diversity within our employees.

### Health and Safety

Safety is priority # 1 at KGS Group. We are committed to providing the highest level of health and safety throughout our entire organization in order to protect the health and safety of our employees, clients, visitors, contractors and the public. To that end, KGS Group makes every effort to achieve an organizational culture which values health and safety over all other considerations. KGS Group's Health and Safety Program clearly identifies the fundamental rights of workers, which are:

- The right to know about any hazards they may encounter in the course of their work;
- The right to refuse dangerous or unsafe work;
- The right to participate in their own health and safety; and
- The right to work without being subject to discriminatory action.

### Workplace Violence

KGS Group is committed to the prevention of workplace violence and is ultimately responsible for employees' health and safety. KGS Group will take whatever steps are reasonable to protect employees (including contract employees) from workplace violence, from all sources.

### Respectful Workplace

KGS Group is committed to providing a friendly working environment in which employees are treated fairly with civility, decency, respect, and dignity, free from abusive conduct and harassment. All employees (including principals, department heads, project managers, supervisors, engineers, scientists, technical support staff, administrative staff and students) have the right to work in a professional atmosphere that is free of abusive conduct and harassment. Everyone is expected to respect the individual qualities, characteristics and differences of others and must promote a professional working environment. Abusive conduct and harassment will not be tolerated.

KGS Group is also committed to respecting the applicable human rights and employment laws currently in force and to honouring the legal obligation not to discriminate on the grounds of ancestry, colour, perceived race, nationality, national origin, ethnic background or origin, religion, creed or religious belief, religious

association or activities, age, sex, gender identity or expression, physical characteristics, pregnancy, sexual orientation, marital or family status, source of income, political belief or activity, physical or mental disability or social disadvantage.

## Overtime Procedure

Our overtime procedure complies with employment legislation.

## 4.0 FORCED LABOUR AND CHILD LABOUR RISKS

We have assessed the risk of forced labour and child labour as low in our supply chain as well as with our own business.

### Supply Chain

Our supply chains are required to complete a vendor registration form that allows KGS Group to gather sufficient information about their organization. Vendors are chosen based on their technical performance and history, compliance with applicable regulations, codes and standards, quality of products or services, health and safety performance, employee competence and qualifications, cost-effectiveness, and their ability to meet the needs and expectations of our clients.

### Our Business

#### EMPLOYEE HIRING

Our industry demands a high level of education; therefore, many of our employees are qualified professionals with recognized diplomas or bachelor's degrees from recognized post-secondary institutions.

#### HUMAN RIGHTS

In compliance with the applicable human rights and employment laws in force and our internal policies, Health and Safety and Respectful Workplace Committees are formed in each of our offices.

KGS Group has established a Health and Safety Committee (the "Committee"). The Committee works co-operatively to identify risks to the safety or health of workers or other persons arising out of or in connection with activities in the workplace. They develop and promote programs for education and information concerning safety and health in the workplace. They also inspect the workplace and review work processes and procedures to ensure the health and safety of workers. All employees receive mandatory health and safety training.

We have developed a Respectful Workplace Policy and engaged a trained consultant to deliver respectful workplace training to ensure all employees are aware of their human rights.

## 5.0 MEASURES TAKEN TO REMEDIATE

There is no material risk of forced labour or child labour in our business or in our supply chain; therefore, there is no need to consider remediation at this time. Ongoing assessment of the risks of forced labour and child labour will help us determine if remediation measures should be taken in the future.

## 6.0 TRAINING

Our employees and contract employees are required to complete the Respectful Workplace and Health & Safety training to ensure that they understand their rights, as well as KGS Group's commitment to providing a friendly working environment where employees are treated fairly with civility, decency, respect, and dignity free from abusive conduct and harassment.

## 7.0 EFFECTIVENESS

KGS Group is committed to assess and continually improve the suitability, adequacy, and effectiveness of our business practices, our internal policies, and to improve our approach to human rights.

## 8.0 APPROVAL AND ATTESTATION

This report has been approved by the Board of Directors of Kontzamanis Graumann Smith MacMillan Inc. for the financial year ended June 30, 2023, by a resolution dated May 28, 2024.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (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.

Rick Martin

President, Kontzamanis Graumann Smith MacMillan Inc.

May 29, 2024

I have the authority to bind Kontzamanis Graumann Smith MacMillan Inc.

**KGS**  
GROUP

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Experience in Action