

# **Supply Chain Risk Report**

Connect Utility Services Ltd.

Fiscal Year 2025  
(Jan 1, 2025 – Dec 31, 2025)

## **Table of Contents**

Section 1) Overview

Section 2) Supplemental Information

Part A: Structure, activities, and supply chains

Part B: Policies and due diligence processes

Part C: Forced labour and child labour risks

Part D: Remediation measures

Part E: Remediation of loss of income

Part F: Training

Part G: Assessing effectiveness

## **Section 1) Overview**

Connect Utility Services Ltd. (“Connect”) is committed to ensuring that our supply chains are free from forced and child labour. As part of our compliance with Bill S-211 (the “Act”), we have prepared this report to outline our continued efforts in identifying, preventing, and addressing these unethical practices.

Implementing policies that prevent forced and child labour embody our fundamental principles of integrity, respect, and responsibility. These unethical practices inflict harm on individuals and erode the trust and credibility within industry. By maintaining supply chains free from these practices, we hope to uphold the rights and dignity of all workers, promote fair labour standards on a global scale, and reinforce our standing as a conscientious and ethical organization.

In the prior reporting period, Connect completed a detailed review of its supply chains, identified areas of potential risk exposure, and strengthened its internal policies and procedures to address forced labour and child labour risks. During fiscal 2025, Connect continued to apply those controls and focused on assessing their effectiveness.

## **Section 2) Supplemental Information**

### **Part A: Structure, activities, and supply chains**

#### Structure

Connect was founded in 2019 and prior to November 2025 was a Nova Scotia based unlimited liability corporation. In November 2025, Connect became a subsidiary of Centuri Holdings Inc., a U.S. – listed public company. This report covers Connect’s activities and supply chains for the fiscal year ended December 31<sup>st</sup>, 2025, including the post-acquisition period. Following the November 2025 acquisition, Connect began aligning certain corporate governance, compliance, procurement, finance, and risk management practices with the broader Centuri group. During the reporting period, Connect continued to manage its day-to-day procurement activities primarily through its existing Canadian operations and QMS processes. Where applicable, Connect also considered Centuri policies, supplier expectations, code of conduct requirements, and compliance resources in assessing and managing supply chain risk. This is not a joint report. It has been prepared for Connect only.

At this time, Connect does not have any subsidiaries. The Connect workforce can fluctuate between 100-250 employees and all of those employees are all located in Canada. We also engage consultants from both inside and outside of Canada. We confirm that Connect meets the definition of an 'entity' outlined in the Act.

#### Activities

We are a high voltage electrical contractor active in each of the Atlantic Canada provinces, and our expertise spans project management, design, construction, testing, maintenance, commissioning, and inspections. Our fleet of over 100 vehicles, capable of both on-road and off-road operations, enables us to handle projects of varying scales, from small urban distribution jobs to large remote high voltage wood and steel transmission projects. We pride ourselves on completing projects safely, on time, on budget, and with exceptional quality.

#### Supply chains

Our supply chain in the last fiscal year was predominantly limited to Canada and the United States and involves suppliers who provide:

- 1) materials and equipment that we import and install on behalf of our customers in Canada, and
- 2) automobiles and construction equipment that we utilize ourselves in the execution of our work

Connect has assessed its obligations under the Act and has concluded that it meets the definition of an "entity." Connect imports certain goods into Canada, including materials, equipment, vehicles, and/or construction equipment used in its operations or installed for customers. While imported goods represent a relatively small portion of Connect's overall cost base, Connect has elected to continue reporting under the Act in the interest of transparency and good governance.

## **Part B: Policies and due diligence processes**

#### Policies

Connect is committed to maintaining ethical labour practices across all our operations and supply chains. We uphold the highest standards of integrity

and responsibility, ensuring that forced and child labour have no place in our business. Our commitment extends to continuous monitoring and improvement of our labour practices to foster a safe, fair, and respectful working environment for all our employees and partners.

#### Due diligence processes

In response to the Act, we took the following actions:

- 1) Developed and implemented specific due diligence policies and processes into our Quality Management System (QMS) for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organizations activities and supply chains.

Our QMS has been in place since 2019 and is the cornerstone of our operations, providing a comprehensive and structured approach to achieving our business goals. A QMS is a structured system of procedures, processes, and practices that an organization uses to ensure that it consistently meets customer and regulatory requirements. It is designed to improve the quality of products and services, enhance customer satisfaction, and drive continuous improvement within the organization. We specifically updated our QSP 840 'Control of Externally Provided Process, Products and Services' to allow for the performance of due diligence on suppliers related to identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.

- 2) Developed anti-forced labour and/or child labour contractual clauses.

We include language in our purchase orders that, as a condition of purchase, require our suppliers to disclose information required to allow us to follow the due diligence standards we have set for ourselves in QSP 840 (outlined above).

- 3) Initiated monitoring of suppliers from outside Canada

Given to date our importation of goods from outside Canada in our last financial year was predominantly limited to the United States, we have initiated monitoring of the U.S. Department of Labour's 'List of Goods Produced by child Labour and Forced Labour' to identify risks that goods imported have been produced by child labour or forced labour.

## **Part C: Forced labour and child labour risks**

Connect's highest-risk procurement categories are not routine Canadian service purchases, but goods with longer upstream manufacturing chains. These may include high-voltage electrical components, transformers, conductors, hardware, fleet vehicles, heavy equipment, electronic components, personal protective equipment, and other manufactured goods. Although many direct suppliers are in Canada or the United States, Connect recognizes that the upstream supply chain for these goods may include raw materials, components, or manufacturing inputs from other jurisdictions. Because of this, we have focused on due diligence on this area of our business.

As discussed in Part B above, we have a three-pronged approach:

- 1) Ensure our QMS has a built-in risk-assessment, which sets the expectation for everyone at Connect with respect to procurement of items susceptible to forced labour or child labour.
- 2) Ensure our purchase order terms and conditions include supplier acknowledgement of forced labour expectations and ensures access to information to perform that due diligence, and
- 3) Continually monitor appropriate government bulletins and advisories that identify countries of origins, and the associated goods, most at risk pertaining to the use of forced labour and child labour

## **Part D: Remediation measures**

Based on our due diligence in the past financial year, we have not identified any forced or child labour in our activities or supply chains.

## **Part E: Remediation of loss of income**

Based on our due diligence in the past financial year, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

## **Part F: Training**

While Connect has a rigorous training plan for our employees, we have not in the past conducted training focused solely on forced labour and child labour

awareness. Now that forced labour and child labour are part of our company QMS (QSP 840 amendments), and we do provide training on the QMS, we have the opportunity to focus future training sessions on these new amendments.

### **Part G: Assessing effectiveness**

In response to the Act, we initiated the changes outlined in Section 1 and initiated an annual review of the effectiveness of these policy and procedure changes. In the past fiscal year, our review assessed the controls and practices outlined in Section 1 and found no instances of non-compliance. Connect did not identify any supplier relationships requiring termination due to forced labour or child labour concerns.

### **Attestation of Approval**

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of CFO, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

- **Christopher Upham**
- **CFO**
- **May 31, 2026**



**I have the authority to bind 'Connect Utility Services Ltd.'**