

ANNUAL REPORT CONCERNING THE RISK OR USE OF FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

Burns & McDonnell Canada Ltd.

For the Financial Year Ended December 31, 2023

This annual report (this “**Report**”) on the risk or use of any forced labour or child labour in the businesses and supply chains of Burns & McDonnell Canada Ltd. (“**Burns & McDonnell**”, “**we**”, “**us**”, or “**our**”) as well as any actions taken by Burns & McDonnell to monitor, assess, mitigate, and remediate the same, as appropriate, is dated as of May 30, 2024 and is being delivered in respect of the financial year ended December 31, 2023 (the “**Reporting Period**”). This Report has been prepared in accordance and compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

Structure, Activities and Supply Chain

Burns & McDonnell is a corporation incorporated in the province of Ontario with its primary office in Calgary, Alberta. Burns & McDonnell is a wholly-owned subsidiary of Burns & McDonnell Engineering Company, Inc., a Missouri corporation.

Burns & McDonnell is a full-service engineering, construction management, environmental and consulting solutions firm with offices in Calgary and Toronto and project offices in Saskatchewan. Burns & McDonnell currently offers engineering and consulting services in all Canadian provinces and territories except Quebec and Prince Edward Island.

Burns & McDonnell has approximately 150 personnel across Canada, including engineers, project managers, project controls, safety and environmental specialists, and construction management professionals.

Burns & McDonnell offers engineering, procurement and construction (EPC) delivery of client projects, which includes purchase of goods to be installed and incorporated into the client project. In 2023, Burns & McDonnell’s had active EPC projects in Alberta and Saskatchewan in the areas of thermal power generation, power transmission and distribution, transit electrification, and agricultural facilities.

In 2023, Burns & McDonnell purchased approximately US\$53.5M of goods for our EPC projects. Of this total, approximately US\$29.4M was purchased within Canada and US\$24M was imported from Austria, Bahrain, Croatia, and the United States. A detailed review of all source countries for these goods was not performed for the 2023 annual report, however Burns & McDonnell is aware that goods purchased in Canada and the United States include goods manufactured in countries across the globe including Brazil, China, Germany, Indonesia, Italy, Norway, and South Korea, and components manufactured in many others.

The categories of goods we purchased in 2023 were:

- Steel including structural steel, piping, plate, and hardware
- Electrical generators
- Large transformers

- Other engineered electrical equipment
- Process equipment including valves and instrumentation and controls
- Transmission line insulators and hardware
- Cables and conductors
- EV charging equipment and controls
- Concrete products
- Crane equipment
- Prefabricated buildings

Burns & McDonnell procures goods as part of EPC projects but does not manufacture goods or sell or distribute goods directly to end clients. Our supply chain is relatively small, with roughly 75 direct suppliers of goods in 2023, and is primarily made up of original equipment manufacturers (OEMs) and large distributors of manufactured projects. To date, the mitigation measures described in this report have focused on direct suppliers and do not typically extend to sub-suppliers. Construction services subcontractors who may provide goods as part of their scope of work are not included in the totals and locations above, but are subject to the mitigation measures described below.

Policies and Due Diligence Processes

Burns & McDonnell embeds responsible business conduct into policies and management systems. We have in place a range of policies and processes that help prevent and mitigate risks related to forced labour and child labour in our operations and supply chain, as further described below.

Business Conduct Guide. Burns & McDonnell is committed to conducting business lawfully and ethically. Our Business Conduct Guide serves as a resource for all, applies equally to everyone and is designed so that we can constantly and consistently act in ways that align with the values of Burns & McDonnell.

Each employee is responsible to read, understand and comply with the Business Conduct Guide. The Business Conduct Guide deals with a range of topics related to ethical conduct and professional integrity, including forced labour, child labour and human trafficking.

Every person has a duty to report ethical concerns. We provide multiple reporting channels for employees to raise ethical concerns, including through management, to the Corporate Compliance Officer, or via our third-party Integrity Helpline. We maintain a strict policy of nonretaliation.

Supplier Registration. Burns & McDonnell requires all suppliers to complete and maintain a current supplier registration before being awarded an order or contract. Registrations are considered current for one calendar year, starting from the date they were last reviewed. Existing vendors, subconsultants, and subcontractors must update their registration information at least every 12 months.

To register, suppliers provide a range of detailed information including information about their corporate registration, ownership, affiliates, licenses, certifications, past experience, projects, management systems, financial status, bonding, and insurance. Suppliers are

required to provide disclosures regarding any regulatory infractions or criminal sanctions. Suppliers must also provide details on their health, safety, and environmental performance.

Use of Reputable Suppliers. Once a supplier is registered, their information is available to project teams for project-specific prequalification. Project teams are then responsible for prequalifying suppliers they are interested in working with by assessing the supplier's capabilities and working with the relevant departments to determine whether a supplier will be a good fit for the specific project at hand.

In registering and prequalifying suppliers, Burns & McDonnell looks for reputable suppliers that align with our values. We seek suppliers who demonstrate commitments to safety and quality, who have a proven record of performance, financial stability, and on-schedule delivery, and who understand the industry.

Supplier Code of Conduct. Burns & McDonnell's Supplier Code of Conduct defines our expectations of suppliers in relation to their work with Burns & McDonnell, which include compliance with all applicable laws. The Supplier Code of Conduct addresses a range of topics related to ethical conduct and integrity, which include statements on forced labour, child labour, and human trafficking. The Supplier Code of Conduct prohibits a supplier from engaging in these activities and sets out minimum standards for supplier employment practices.

Burns & McDonnell expects all suppliers to subscribe to our ethical standards and does not condone any illegal or unethical actions on the part of any supplier. Potential suppliers are required to acknowledge the Supplier Code of Conduct as part of the registration process. Suppliers are obligated by our standard contract terms to comply with the Supplier Code of Conduct.

Additional Policies. Burns & McDonnell's anti-harassment policy prohibits discrimination and harassment, including verbal, nonverbal, visual, and physical conduct and threats. We also operate a robust background screening policy. These policies help safeguard against human trafficking and protect against retaliation. They are available to all employees on our intranet site, MacCentral.

Corporate Social Responsibility. Burns & McDonnell's approach to social responsibility considers several facets including diversity, equity and inclusion (DE&I), community impact, and sustainability. As part of our social responsibility commitments, our parent company publishes an annual Corporate Sustainability Report.

Forced Labour and Child Labour Risks

The goods that Burns & McDonnell procures from its suppliers are often complex, engineered equipment, and are made up of a wide range of commodities and components such as steel, aluminum, copper, and alloys, glass, ceramic, rubber, and composites, oil products and plastics, and a variety of mined minerals. After identifying the categories of goods that we procured in 2023 and the primary sources of those goods, as outlined above, we reviewed the list of goods produced with forced labour and/or child labour as prepared by the US Department of Labor (USDOL). Based on the USDOL list, none of the goods directly procured by Burns & McDonnell are considered high risk for

the use of either forced labour or child labour. However, Burns & McDonnell recognizes that commodities used in some of these goods are at risk for the use of forced labour or child labour. The commodities on the USDL list that may be included in the goods we procure are copper, electronics components, gold, iron, polysilicon, rubber, tantalum, tungsten, and zinc.

Remediation Measures

The preventative measures that Burns & McDonnell has taken are described in section (b), above. No measures have been taken at this time to remediate specific instances of forced labour or child labour that exist in our activities and supply chains.

Remediation of Loss of Income

No measures have been taken at this time to remediate loss of income to vulnerable families from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Training

All employees complete mandatory training on our Business Conduct Guide. No mandatory training is established at this time specific to forced labour or child labour.

Assessing Effectiveness

No actions have been taken at this time to assess the effectiveness of our measures to prevent and reduce risks of forced labour and child labour.

Attestation

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 Burns & McDonnell Canada Ltd. 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.



Darcy J. Wagner
Director, Burns & McDonnell Canada Ltd.
May 30, 2024

I have authority to bind Burns & McDonnell Canada Ltd.

Approved by the Board of Directors of Burns & McDonnell Canada Ltd. this 30th day of May, 2024.