



Hamm Construction Ltd.  
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**Bill S-211 An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to Amend the Customs Tariff**

**Overview**

As of January 1, 2024, Bill S-211 An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to Amend the Customs Tariff (“the Act”), passed by the Canadian government, came into effect which requires all entities who meet the established criteria to file an annual report on forced labour and child labour within their supply chain. Hamm Construction Ltd. (“HAMM”) fully supports the profound action of the Canadian Government to combat forced labour and child labour by the introduction of this Act. This report is an official statement by HAMM that addresses the policies and procedures in place, and those that are currently being developed, to reduce the risk of forced labour and child labour within the organization and its supply chain.

**Forced Labour and Child Labour Defined**

According to the Act, forced labour and child labour are defined by the following:

- Forced Labour: means labour or service provided or offered to be provided by a person under circumstances that:
  - (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
  - (b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930. (*travail forcé*)
- Child Labour: means labour or services provided or offered to be provided by persons under the age of 18 years and that
  - (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
  - (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
  - (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
  - (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999. (*travail des enfants*)

# HAMM

## Corporate Structure

Hamm Construction Ltd. is a privately owned general contracting company in the underground waterworks and earthworks industry that was founded by Henry Hamm in 1971. HAMM is a wholly-owned subsidiary of Trinity Investment Corp. The company continues to be a family-owned business to this day. HAMM has been a leader in the industry in Western Canada since its inception. The company's fiscal year-end is March 31 and reports under the Accounting Standards for Private Enterprises (ASPE). This report highlights the corporation's activities and responses to the Act undertaken during the company's March 31, 2024 fiscal year-end.

## Activities

HAMM provides general contracting services in the underground waterworks and earthworks industries in a safe, efficient, and professional manner. The type of projects that HAMM has completed over the years include, but are not limited to, residential and commercial developments, water and wastewater rehabilitation, transmission pipelines, primary water mains, and storm sewer trunks. Strong relationships with clients, engineering firms, and suppliers have proven to be a great asset in completing projects on time and within budget (<https://www.hammconstruction.ca/about/>). HAMM has safely and successfully completed countless projects in major cities and rural areas across Saskatchewan and Alberta, with its headquarters in Saskatoon, Saskatchewan, Canada. As part of the corporation's core values, employee safety remains its top priority within company operations and its supply chain. HAMM takes great pride in the quality of workmanship and customer satisfaction that is achieved through the commitment and perseverance of its management and employees (<https://www.hammconstruction.ca/about/>).



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## Supply Chain

While HAMM does not produce, sell, or distribute goods as part of its business activities, the company purchases goods and materials from numerous vendors that are necessary for its operations. HAMM purchases its goods and materials from local vendors and from suppliers located outside of Canada. All goods and materials used by HAMM can be segregated into three main categories: production and operations, shop and maintenance, and office goods.

## Production and Operations

As part of being an underground waterworks company, HAMM purchases and installs tens of thousands of meters of pipe across Saskatchewan and Alberta. Production and operational goods and materials include pipe, valves, casings, hydrants, pumps, as well as light and heavy equipment and machinery. HAMM sources goods for production from a select few vendors that the company has maintained a strong business relationship with over several years. Many of these vendors are local dealers that have frequently supplied materials for HAMM for its various jobs.

## Shop and Maintenance

HAMM utilizes many vendors to purchase goods such as shop supplies and equipment parts for repairs and maintenance. Many of these suppliers are small, local companies that HAMM has created strong business relationships with over the years. Shop and Maintenance goods include various equipment repair parts, small tools and equipment, cleaning goods, and shop supplies.

## Office

Goods and supplies for office use include items such as office furniture, computers, paper, and miscellaneous stationary and non-stationary items. Suppliers for these goods are almost exclusively local businesses that have supplied HAMM with office goods and supplies for many years.

Many of the goods that HAMM purchases are manufactured and assembled in Canada or the United States of America, while few goods are manufactured abroad. HAMM expects all companies that it conducts business with to abide by the applicable labour laws and regulations in each jurisdiction which it operates.

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## Risks Within the Supply Chain

HAMM purchases goods from suppliers who manufacture or obtain materials and goods from countries around the world. HAMM strives to obtain goods that are ethically sourced, and its goal is to ensure that all materials and goods purchased support this objective. HAMM expects all of its suppliers to have established policies and procedures that do not allow for forced labour and child labour to occur in its business practices and within its own supply chain. HAMM remains diligent within its practices and constantly seeks vendors who share the same respect and commitment to human rights obligations and a commitment to mitigate the use of forced labour and child labour.

Risks within our supply chain include:

- Purchasing goods manufactured by labourers who are forced to work in unethical working conditions, or are forced to work extreme hours with little to no rest breaks.
- Purchasing goods manufactured by the exploitation of children that is harmful to their mental, emotional, and physical well-being and development.

## Company's Response to Address Risks

HAMM recognizes the importance of supporting local businesses within our community. When possible, the company selects suppliers of goods located where the work is performed, which is in Saskatchewan and Alberta, however, this may not always be possible. For all vendors located internationally and abroad, HAMM is currently undergoing, and will continue, extensive research and analysis of its supply chain to determine the compliance of all of its vendors regarding child and forced labour.

HAMM has crafted a vendor questionnaire that includes curated questions directed to each supplier. This questionnaire was distributed to each of the company's major suppliers within its supply chain. This questionnaire was used to identify where goods are sourced and manufactured, and whether each of HAMM's suppliers have the appropriate policies and procedures in place to support eliminating forced labour and child labour from supply chains. HAMM has also conducted a supply chain mapping exercise to identify areas of its supply chain that may pose a risk of human rights violations. Based upon the results of these procedures performed to date, HAMM has not identified any instances of forced labour or child labour within its supply chain. If HAMM discovers that a supplier has committed any human rights violations, the business relationship between HAMM and the supplier will be terminated immediately. HAMM will not continue a business relationship with suppliers who knowingly commit acts of human rights violations that oppose the values of Hamm Construction Ltd.

HAMM will continue to review its policies and procedures and has begun developing an official supplier code of conduct that each supplier must abide by in order to continue a business relationship with Hamm Construction Ltd. This will help ensure HAMM is engaged with vendors who operate ethically, and meet the expectations of HAMM, which strengthens the company's supply chain.

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## Company Policies and Procedures

Hamm Construction Ltd. believes its people are its most important asset and that their safety and health are our greatest responsibility. Given the nature of the work that the company operates in, HAMM performs an extensive interview process to ensure each prospective employee is fit for the work expected of them. Upon interviewing potential candidates to fill vacant positions in the field, HAMM's human resource team screens each individual by obtaining a resume to ensure they are of working age. Upon hiring an individual for such work, a valid driver license and health card are required to be produced by each employee to complete the employee screening processes. Further, the company does not hire anyone working on construction jobs sites under the age of 18 years. This is to ensure that all field staff are of legal age to perform duties on a construction site.

While no underaged individual shall work on construction sites, HAMM does allow the hiring of individuals under the age of 18 to work in the office to complete administrative duties. However, they must be the minimum working age per the Saskatchewan labour laws, which is 16 years of age for full-time employees, and 14-15 years of age with parental or guardian permission granted and appropriate completion of the Young Worker Readiness Certificate Course

(<https://www.saskatchewan.ca/business/hire-train-and-manage-employees/youth-in-the-workplace/minimum-age-and-workplace-restrictions#young-worker-workplace-restrictions>). Individuals who are hired for administrative purposes within this age range are paid above minimum wage.

The safety of employees is of utmost importance. HAMM prohibits employees from working longer than allowed under provincial and federal labour laws, including daily limits and consecutive working day limits. HAMM also does not allow employees to continue to work if they are injured or severely ill. If an incident occurs, or almost occurs (deemed as a 'near miss'), it is company policy to immediately report the incident to management for further investigation. The HAMM Employee Handbook discusses the safety policies and procedures at HAMM that all employees must abide by. The Handbook cites *Section 23 of the Occupational Health and Safety Act*, stating "A worker may refuse to perform any particular act or series of acts at a place of employment where the worker has reasonable grounds to believe that the act or series of acts is unusually dangerous to the worker's health or safety or the health or safety of any other person at the place of employment until: a. Sufficient steps have been taken to satisfy the worker otherwise; or b. The occupational health committee has investigated the matter and advised the worker otherwise".

As mentioned previously, safety is HAMM's primary core value. HAMM is proud that, as of April 2024, HAMM has successfully completed 1.2 million hours with no lost time injuries in the workplace. This is a testament to the importance that safety holds within the company. Per the company's website, a dedicated tab to Safety can be found with the following excerpt:

*"Our belief is that incident prevention and efficient production goes hand in hand. HAMM insists that all activities will be carried out in a safe and responsible manner that meets and where attainable exceed all legal requirements. Hamm ensures all Federal and Provincial Health, Safety, and Environmental Regulations pertaining to the workplace are conformed to. We are*

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*focused on protecting the health and safety of our employees, customers, contractors, suppliers, and the communities where we work.”*

HAMM continually reviews and improves its existing policies and procedures to strengthen its stance against forced labour and child labour internally and in its supply chain. The company is committed to working with vendors locally and abroad to ensure that ethical practices are being followed and that they adhere to the applicable human rights laws in regulations in each jurisdiction.

## Remediations

Through HAMM’s due diligence procedures performed to date, and through ongoing dialogue between the company and its suppliers, HAMM has not discovered, or has been made aware of, any instances of forced labour or child labour within its supply chain. As such, HAMM has not taken any remediation measures.

## Training

Upon hire, employees receive “new-hire orientation” that includes education and training on the hazards they may be exposed to at work along with training on the three rights of a worker; the right to know, the right to participate, and the right to refuse, as per the Occupational Health and Safety Regulations 2020 (<https://publications.saskatchewan.ca/api/v1/products/112399/formats/126367>).

Prior to the start of the construction year, HAMM hosts an orientation meeting that all employees, current and new hires, are expected to attend. Each meeting includes a presentation from the Safety Manager on the importance of working safely in the field. These details are also presented in HAMM’s Policy Handbook which is reviewed with HAMM employees annually.

HAMM provides training and educational materials to management and supervisors on an ongoing basis that encompasses all administrative policies and practices.

# HAMM

## 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 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 ended March 31, 2024.

Bob Hamm

President

Date: May 17, 2024

Signature:



*I have the authority to bind Hamm Construction Ltd.*