



2023

LamSar<sup>INC</sup>

***Fighting Against  
Forced Labour and  
Child Labour in  
Supply Chains Act***

**REPORT**

April 1, 2023 - March 31, 2024

LamSar Inc.

Business #873400196

# INTRODUCTION

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This report has been prepared by LamSar Inc. (hereinafter referred to as “LamSar”) in response to the reporting requirements under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for our financial year ending March 31, 2024.

LamSar recognizes the construction industry plays an important role in preventing and assessing the risk of forced and child labour in Canada’s supply chain. We acknowledge the risks of forced and child labour in the construction industry and are committed to continuous

improvement in our due diligence, risk assessment, remediation, and training processes.

We are committed to respecting the human rights of people impacted by the operations in our supply chain.

To uphold this commitment, LamSar has implemented stringent policies and procedures to ensure that all suppliers and contractors adhere to ethical labor practices. Through regular audits and assessments, we closely monitor our supply chain to identify and address any instances of forced or child labor promptly.

These policies provide administrative support to our employees and partners to raise awareness and promote a culture of respect for human rights. By taking these proactive measures, LamSar aims to create a safe and fair working environment for all individuals involved in our operations.



# OUR STRUCTURE, ACTIVITIES, & SUPPLY CHAINS

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## OUR STRUCTURE

We are a dynamic organization structured into three business units: Operations, Corporate Office, and Field. These business units incorporate employees in our locations in Sarnia ON, Pictou NS, and Michigan, USA. Employing up to 1,000 individuals in Canada, our team size fluctuates to meet project demands.

Our manufacturing operations incorporate materials from around the world. These materials are then integrated into finished products that are redistributed globally.

Our complex supply chain involves procurement via third-party vendors.

## WHAT WE DO

As a leading heavy industrial contractor working predominantly in the oil & gas, marine, and energy transition industries, we specialize in:

- Fabrication;
- Project Management;
- Engineering and Design Build;
- Modular Construction;
- Field Installation; and
- Maintenance and Turnarounds.

We redefine what it means to be a full-service provider.



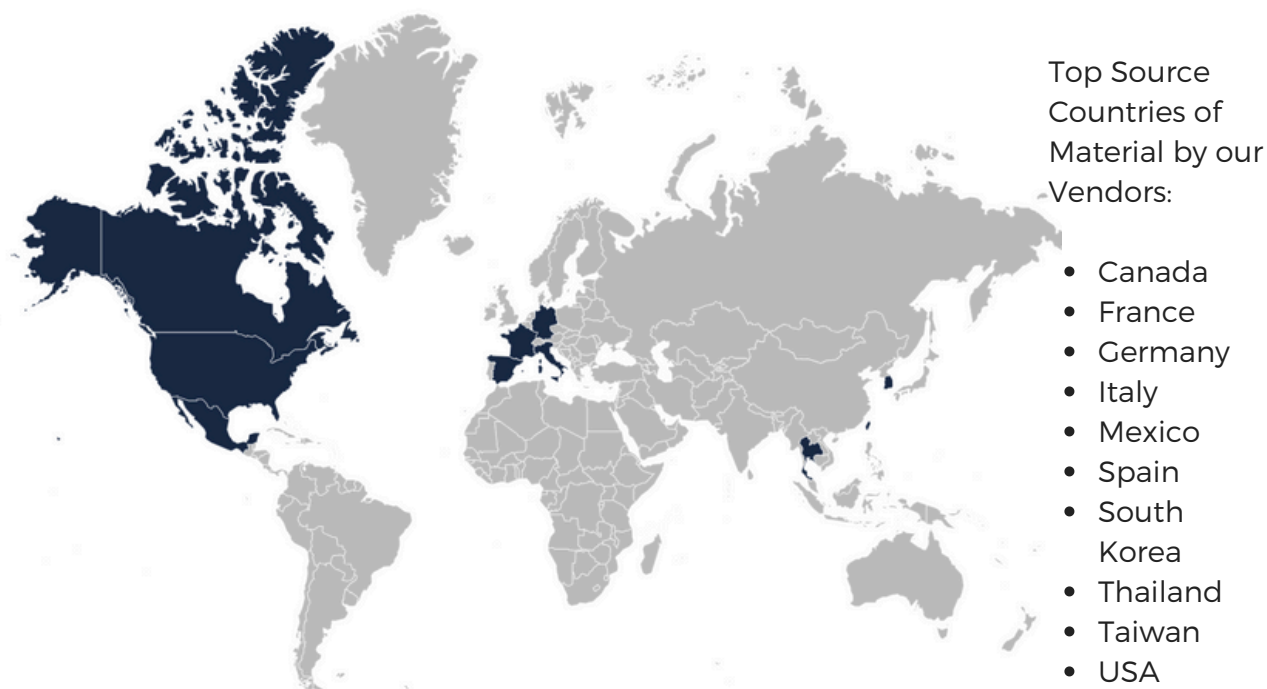
## OUR SUPPLY CHAIN

The supply chain team at LamSar ensures that vendors adhere to quality and care requirements by meticulously tracking key metrics, including spend, performance history, discrepancies, and non-conformances.

In the fiscal year 2023, LamSar allocated its total spend to support Canadian operations. The predominant expenditure categories were as follows:

- **Pipeline Construction:** products and services necessary for the construction of new pipeline, pipeline facilities, and energy infrastructure.
- **Pipeline Maintenance:** dedicated to servicing and maintaining existing pipelines within the oil & gas and petrochemical industries.
- **Industrial Maintenance & Turnarounds:** upkeep and maintenance of infrastructure within the oil & gas and petrochemical industries.

Our primary procurement channel involves engaging with vendors who, in turn, either manufactured or imported the required materials. For materials LamSar imports, our most common countries were: U.S.A., Italy, China, Japan, and India.





# POLICIES & DUE DILIGENCE

Acknowledging the importance of due diligence, we are at the threshold of developing comprehensive policies focused on eradicating forced and child labour in our supply chains. This initiative is still in its nascent stages, and we recognize the need for structured risk identification within our operations and among our direct and indirect suppliers.

The following are policies and practices which support LamSar's initiative against forced and child labour.

## Health, Safety, & Environmental Policy

This policy establishes a commitment by Management to eliminate the risk of unsafe practices and reduce the industry's tolerance for risk.

## Supply Chain Policy

This policy sets the precedent that all vendors contracted by LamSar must follow the International Labour Organization's *Declaration of Fundamental Principles and Rights at Work*. Furthermore, it establishes that vendors must not be complicit in human rights abuses, must not encourage or support the perpetration of human rights abuses, and must not be inactive or remain silent when aware of human rights abuses. Finally, the policy contains information regarding who is responsible for reporting violations of LamSar's Supply Chain Policy.

## Code of Business Conduct & Ethics

This policy establishes the process by which complaints are addressed, including the protection of employees or consultants who issue a complaint.



# MODERN SLAVERY RISKS

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## UNDERSTANDING OUR RISK EXPOSURE

The primary risk exposure for LamSar concerning forced labour and child labour lies within our supplier network. These risks predominantly arise from the procurement of goods in higher-risk geographical areas and sectors.

We acknowledge the potential risks associated with forced labour and child labour throughout our extended supply chain. Implementing modern slavery compliance measures presents complex challenges, and LamSar is committed to addressing them.

Internally, we have established a dedicated team to identify and assess geographical regions, industries, and suppliers with high-risk exposures to forced and child labour.

Following a comprehensive review of our supply chain activities involving both direct and indirect suppliers, we have identified steel and pipe as presenting the highest risk exposure to forced labour and child labour for LamSar via our second and third-tier suppliers. This assessment aligns with the U.S. Department of Labor's *2022 List of Goods Produced by Child Labor or Forced Labor*.

Moving forward, LamSar will continue to vigilantly evaluate our third-party suppliers in relation to forced labour and child labour, while recognizing that high-risk supplies and countries may evolve over time.

*Source: Global Slavery Index at walkfree.org; U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor.*



# OUR INITIATIVES

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While remedial actions specific to forced or child labour have not yet been undertaken, we are laying the groundwork for future measures. This includes planning for targeted training for our employees to heighten awareness and foster compliance with ethical labour practices.

We are committed to continuously improving our progress to respond to forced labour and child labour risks in our supply chain.

To assess the effectiveness of our approach, we undergo regular assessments of our existing policies and procedures.

## Report Approval & 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 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.

Paul Healy, President

*I have the authority to bind LamSar, Inc.*

David Hill, Vice President

*I have the authority to bind LamSar, Inc.*

Date: May 15, 2024