



***Pitt Meadows Plumbing***  
*& Mechanical Systems Ltd.*

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**REPORT PURSUANT TO  
THE FIGHTING AGAINST  
FORCED LABOUR AND  
CHILD LABOUR IN  
SUPPLY CHAINS ACT**

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**May 2024**

## Introduction

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Pitt Meadows Plumbing & Mechanical Systems Ltd. ("PMP") is committed to acting ethically and with integrity in all of our business dealings and relationships and, as part of that, to working collaboratively with our suppliers to identify and reduce the risk of forced labour or child labour occurring anywhere within our supply chains.

PMP expects our suppliers to operate in accordance with all applicable anti-slavery laws, including those prohibiting human slavery and slavery-like practices, human trafficking, forced labour and child labour, and particularly including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").





## Structure, Activities and Supply Chains

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PMP is incorporated pursuant to the Company Act in the Province of British Columbia, with our head office located in Maple Ridge, British Columbia. PMP is a Canadian Controlled Private Corporation and is the flagship company of a family-owned enterprise with interests in construction, commercial real estate, farming, and food processing.

PMP itself is a large-scale mechanical contractor and actively contributes to a wide range of construction projects. PMP works on hospitals, prisons, schools, and complex residential projects, as well as other institutional, industrial, and commercial projects. Our operations are primarily in British Columbia, but we have been involved in projects as far east as New Brunswick and as far north as the Yukon.

As at December 31, 2023, including all companies under common control, PMP had approximately 500 salaried or hourly employees in our Canadian operations.

Almost all of PMP's procurement relates to purchases of various forms of pipe and equipment for installation on the various projects we are a part of. PMP deals with reputable, well-established suppliers and has forged long-term relationships with our most important suppliers. All of our suppliers are based in Canada, but source their products from around the world as required. PMP continues to engage collaboratively and diligently with all of our suppliers with respect to recognizing and reporting any risk of forced labour or child labour that may arise within our supply chains.

## Policies and Due Diligence Processes related to Forced Labour and Child Labour

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PMP's Employee Handbook sets out the ethical standards that each and every PMP employee, officer, director, agent and representative is bound to follow and comply with. In addition to our Employee Handbook, PMP has crafted the following antislavery policy, which states:

"PMP strives to promote the highest standards of ethical conduct throughout its supply chain. We are committed to mitigating the risk that forced labour or child labour is used at any step of the production of goods imported by us into Canada. We adhere to, and take steps to ensure our suppliers adhere to, the most stringent of prevailing national laws and recognized international standards relating to modern slavery and human trafficking. PMP will not knowingly use forced labour in the provision of any of our services nor will we knowingly accept products or services from vendors or contractors that employ or utilize forced labour."

The Employee Handbook is provided to all new employees upon hire and they are required to sign off on it stating that they have read and understood it.

Additionally, PMP works with all its suppliers to ensure adherence to our standards relating to compliance with laws and ethics as a contractual term in each of PMP's purchase orders. Such standards require PMP's suppliers to:

- (a) be in, and at all times remain in, full compliance with all applicable laws, including laws related to child labour, forced labour and human trafficking;
- (b) confirm that they have not and will not engage in any activity, practice, or conduct that would constitute an offense under any such laws; and
- (c) have in place policies and procedures adequate to ensure compliance with all such laws by its officers, employees, agents and any other third parties or persons associated with the supplier or contractor in the provision of goods or performance of services.

Such obligation of compliance imposed by PMP on our suppliers is applicable in all jurisdictions in which PMP or the suppliers operate. If PMP receives credible evidence that any supplier has not complied with its obligations in that regard, by the terms of PMP's purchase orders, PMP may: (i) terminate any services; (ii) refuse to take delivery of any goods or services; and (iii) return any goods already delivered, with reimbursement.

## **The Risk of Forced Labour and Child Labour in our Business and Supply Chains**

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PMP has undertaken an assessment of potential forced labour and child labour in our operations and supply chains. Key factors of the assessment included risks related to the geographic areas from where we purchase pipe or equipment for importation into Canada. From our assessment, and in light of the long-term ongoing relationships that PMP has with our equipment and pipe suppliers, as well as the nature of the processes required to produce such pipe and equipment, PMP has concluded that we do not believe there to be a calculable risk of forced labour or child labour within our business or supply chains.

## **Remediation Measures**

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As a result of the determination by PMP that there is no identifiable risk in our operations, business or supply chains of forced labour or child labour. PMP has not taken any special measures to remediate any issues of forced labour or child labour or any measures to remediate the loss of income to vulnerable families that may result from any measure taken to eliminate the use of forced labour or child labour.

## **Training of PMP Employees**

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At present, PMP provides no mandatory formal training for our current or prospective employees related to forced labour or child labour. However, PMP does require our Procurement Team to ensure compliance with the Act on an annual basis. We are committed to improve the training we provide to our current and future employees should the need arise.

## **Organization Assessment of Effectiveness of Policies Related to Forced labour and Child Labour**

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PMP continually monitors and improves where necessary all employee and organizational policies as any deficiencies are discovered.

## **Attestation**

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This Report has been approved by the Owners of Pitt Meadows Plumbing & Mechanical Systems Ltd. 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 Pitt Meadows Plumbing & Mechanical Systems Ltd. and on behalf of the companies under common ownership. 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 aspects for the purposes of the Act, for the reporting year January 1, 2023 to December 31, 2023.

Signed this 23rd, day of May, 2024, by James Zelinski, Vice President & Chief Administrative Officer of Pitt Meadows Plumbing & Mechanical Systems Ltd.



James Zelinski  
I have the authority to bind Pitt Meadows Plumbing & Mechanical Systems Ltd.

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