



LamSAR^{INC}

building better together

BILL S211 ANNUAL REPORT
April 1, 2024 - March 31, 2025

ANNUAL REPORT SUMMARY

The Framework

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, 2025.

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. Respect for human rights is embedded in our core values: Mutual Respect, Integrity, Openness, Diversity & Inclusion, Trust, and Freedom.

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



LamSar’s policies and procedures ensure that our suppliers and subcontractors adhere to ethical labour practices in line with the International Labour Organization’s *Declaration of Fundamental Principles and Rights at Work*.

We closely monitor our supply chain through regular audits and assessments to ensure our suppliers and subcontracts continue to follow ethical labour practices. LamSar partakes these proactive measures to create a safe and fair working environment for all individuals involved in our operations. We will continue to uphold our commitment to respecting human rights in our operation.

OUR STRUCTURE, ACTIVITIES, & SUPPLY CHAINS

Our Structure

LamSar is organized into three business units: Operations, Corporate Office, and Field Execution. These units include our employees across Canada (Sarnia, Ontario; Pictou, Nova Scotia; and various work sites) as well as St. Clair, Michigan, U.S.A.

We employ up to 1,000 individuals in Canada, with our numbers fluctuating to best meet client needs.

LamSar procures and receives client-procured materials from around the world for our manufacturing operations. These materials are then integrated into finished products that are redistributed globally.

What We Do

Redefining what it means to be full-service.

As a leading heavy industrial contractor working predominately in the Oil & Gas, Marine, and Energy Transition sectors, we specialize in:

FABRICATION

ENGINEERING &
DESIGN-BUILD

FIELD
INSTALLATION

PROJECT
MANAGEMENT

MODULAR
CONSTRUCTION

MAINT. &
TURNAROUNDS

Our Supply Chain

LamSar holds its vendors to high quality standards by tracking key metrics such as spend, performance history, discrepancies, and non-conformances.

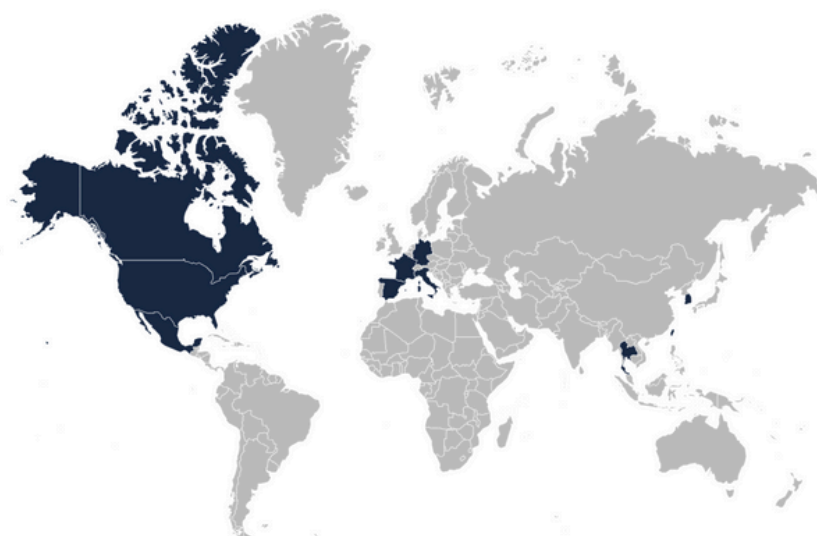
In the fiscal year 2024, LamSar allocated its total spend to supporting Canadian operations. Below are the predominant expenditure categories:

- **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 that LamSar imports, our most common countries were U.S.A., Italy, China, Japan, and India.

Top Source Countries of Material by our Vendors

- Canada
- France
- Germany
- Italy
- Mexico
- Spain
- South Korea
- Thailand
- Taiwan
- USA



OUR POLICIES & DUE DILIGENCE

Ethical Standards

Acknowledging the importance of due diligence, we have developed comprehensive policies focused on eradicating forced and child labour in our supply chains.

The following policies and procedures highlight 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.

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.

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.

UNDERSTANDING OUR RISK EXPOSURE

Modern Slavery Risks

The primary risk exposure for LamSar concerning forced 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 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 and child labour for LamSar via our second and third-tier suppliers.

This assessment aligns with the U.S. Department of Labor's *List of Goods Produced by Child Labor or Forced Labor* (2024).

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.

OUR INITIATIVES

Driving Impact

At this time, 75% of all employees involved in the procurement process have undergone training related to Bill S211, with an expected participation rate of 100% by the end of FY2025. This training has fostered awareness and compliance with ethical labour practices.

We are committed to continuously improving our progress to respond to forced and child labour risks in our supply chain. In addition to education, we have used a third -party sustainability assessment platform to evaluate our human rights performance.

To assess the effectiveness of our approach, we undergo regular assessments of our 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.



Corey Nathan, President
I have the authority to bind LamSar Inc.



Randy Goertz, VP Ontario Operations
I have the authority to bind LamSar Inc.

Date: May 15, 2025