



Lorneville Mechanical Contractors Ltd.

Annual Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)

Reporting Year: November 26, 2023 – November 30, 2024

A. Structure, Activities, and Supply Chains

Lorneville Mechanical Contractors Ltd. is a privately owned Canadian company headquartered in New Brunswick. The organization specializes in industrial construction, mechanical installation, module fabrication, and maintenance services for clients operating in the energy, utility, and heavy industrial sectors.

Lorneville operates across various provinces in Canada, delivering both field and fabrication services. Its supply chain includes a combination of Canadian and international suppliers (the vast majority being domestic) encompassing materials, equipment, consumables, and personal protective equipment (PPE). These goods are sourced through direct Tier 1 vendors and distributors. The company does not engage in the production or retail of consumer goods.

B. Policies and Due Diligence Processes

Lorneville has implemented an Anti-Modern Slavery Policy which is embedded in its Supplier Pre-Qualification process. This policy is mandatory for all subcontractors performing work for Lorneville and outlines responsibilities in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211).

Policy provisions include:

- Signed compliance by subcontractors and suppliers.
- Flow-down obligations to secondary vendors.
- Procurement restrictions from known high-risk sources.
- Immediate disclosure and remedial action requirements in the event of a suspected breach.

The policy is hosted on Lorneville's internal SharePoint and communicated to relevant stakeholders during onboarding and contract execution phases.

C. Risk Assessment and Management

Risk identification has focused on two primary areas:

1. Procurement of materials and equipment, particularly items such as fabricated steel components and PPE that may originate from regions with less robust labour enforcement.
2. Use of subcontracted labour, particularly for specialized trades, where transparency beyond Tier 1 vendors may be limited.



To mitigate these risks, Lorneville requires signed acknowledgment of its Anti-Modern Slavery Policy from all relevant suppliers and subcontractors. While the company's exposure to international sourcing remains limited, the same due diligence requirements apply where applicable.

D. Remediation of Identified Forced or Child Labour

No cases of forced labour or child labour were identified in Lorneville's operations or supply chains during the reporting period. As such, no remediation actions were undertaken.

E. Remediation of Income Loss to Vulnerable Families

No measures were required or taken in this reporting year, as Lorneville did not implement any actions that resulted in the loss of income to vulnerable individuals or families.

F. Training

Over the duration of 2024, Lorneville has adapted to the needs of our project sites. We initially provided training for all active employees that outlined the history of Forced Labour/Child Labour and explained preventative measure put forth by our company. This was delivered via a PowerPoint presentation through our online LMS system, but given feedback provided from our project sites and concerns with timeliness in completions, we have adapted by alternatively allowing our HSE team to deliver a QSR (Toolbox Talk) to the project crews that consists of our company policy on Bill S211. They are obliged to sign an attendance sheet that states the toolbox topic, the date it was delivered, and by whom it was delivered, and this record must be submitted to our Training Coordinator to document the completion/compliance on our company Training dashboard. At this time, the training is mandatory, however, there is no expiration criterion set. Since our last report, we have ensured that our policy is outlined in all versions of our Site/Staff Orientation courses, and we currently stand at a higher rate of compliance/awareness due to these modifications.

G. Assessing Effectiveness

Lorneville monitors the implementation and awareness of its policy through:

- Tracking the number of policy acknowledgments signed.
- Maintaining policy visibility and accessibility across internal platforms.
- Reviewing communications and compliance from subcontractors.
- Responding to any reported concerns through designated channels.

The company will continue to develop internal controls and refine its oversight mechanisms as expectations and practices evolve.

Approved by:

Name: Daniel Marr
Title: Corporate Supply Chain Manager
Date: MAY 28, 2025

Approved by the governing body of Lorneville
Mechanical:

Name: James Brewer
Title: President
Date: MAY 28, 2025