# ANNUAL REPORT CONCERNING THE RISK OR USE OF FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

#### Burns & McDonnell Canada Ltd.

# For the Financial Year Ended December 31, 2024

This joint annual report is provided for Burns & McDonnell Engineering Company, Inc. and Burns & McDonnell Canada Ltd. (together, "Burns & McDonnell", "we", "us" or "our"). This Report, which discusses the risk or use of forced labour or child labour in the businesses and supply chains of Burns & McDonnell as well as any actions taken by Burns & McDonnell to monitor, assess, mitigate, and remediate the same, as appropriate, is dated as of May 30, 2025 and is being delivered in respect of the financial year ended December 31, 2024 (the "Reporting Period"). This Report has been prepared in accordance and compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").

#### Structure, Activities and Supply Chain

Burns & McDonnell Engineering Company, Inc. is a corporation incorporated in the state of Missouri with its headquarters in Kansas City, Missouri. Burns & McDonnell Canada Ltd. is a corporation incorporated in the province of Ontario with its primary office in Calgary, Alberta. Burns & McDonnell Canada Ltd. is a wholly-owned subsidiary of Burns & McDonnell Engineering Company, Inc.

Burns & McDonnell is a full-service engineering, construction management, environmental and consulting solutions firm with Canadian offices in Calgary and Toronto and Canadian project offices in Alberta and Saskatchewan. In Canada, Burns & McDonnell currently offers engineering and consulting services in all provinces and territories except Quebec and Prince Edward Island.

As of December 31, 2024, Burns & McDonnell had approximately 180 employees in Canada, including engineers, project managers, project controls, safety and environmental specialists, and construction management professionals.

Burns & McDonnell offers engineering, procurement and construction (EPC) delivery of client projects, which includes purchase of goods to be installed and incorporated into the client project. In 2024, Burns & McDonnell had active EPC projects in Alberta and Saskatchewan in the areas of thermal power generation, power transmission and distribution, and agricultural facilities.

In 2024, Burns & McDonnell purchased goods for our EPC projects in Canada totalling approximately US\$102.8M, including freight. Of this total, approximately US\$22.0M was purchased from vendors within Canada and US\$80.8M was imported from Belgium, Germany, Japan, Mexico, South Korea, Sweden, Switzerland, and the United States. A detailed review of all source countries for these goods was not performed for this Report, however Burns & McDonnell is aware that goods purchased in Canada and the United States include goods manufactured in countries across the globe including Austria, Brazil, China,

Finland, France, India, Lichtenstein, Malaysia, Netherlands, Norway, Portugal, Romania, South Africa, Spain, Taiwan, United Kingdom, and Vietnam, and which include components manufactured in many others.

By value, more than 95% of the goods we purchased in 2024 were engineered equipment, with the remaining 5% being freight costs, other equipment and material, and commodities and chemicals. The categories of engineered equipment we purchased in 2024 included:

- Generators and associated equipment
- Process equipment for agricultural facilities
- Air and water systems for power generation facilities
- Power transformers
- Instrumentation and controls equipment
- Other electrical equipment for power generation and transmission facilities
- Cables and conductors
- Concrete products
- Steel including structural steel, piping, plate, and hardware
- Prefabricated buildings, skids, building cranes and hoists

Burns & McDonnell procures goods as part of EPC projects but does not manufacture goods or sell or distribute goods directly to end clients. In 2024, we purchased goods from approximately 100 direct suppliers, and our supply chain is primarily made up of original equipment manufacturers (OEMs) and large distributors of manufactured projects. To date, the mitigation measures described in this report have focused on direct suppliers and have not typically extended to sub-suppliers. Construction services subcontractors who may provide goods as part of their scope of work are not included in the totals and locations above, but are subject to the mitigation measures described below.

## Policies and Due Diligence Processes

Burns & McDonnell embeds responsible business conduct into policies and management systems. We have in place a range of policies and processes that help prevent and mitigate risks related to forced labour and child labour in our operations and supply chain, as further described below.

**Business Conduct Guide**. Burns & McDonnell is committed to conducting business lawfully and ethically. Our <u>Business Conduct Guide</u> serves as a resource for all, applies equally to everyone and is designed so that we can constantly and consistently act in ways that align with the values of Burns & McDonnell.

Each employee is responsible to read, understand and comply with the Business Conduct Guide. The Business Conduct Guide deals with a range of topics related to ethical conduct and professional integrity, including forced labour, child labour and human trafficking.

Every person has a duty to report ethical concerns. We provide multiple reporting channels for employees to raise ethical concerns, including through management, to the Corporate Compliance Officer, or via our third-party Integrity Helpline. We maintain a strict policy of nonretaliation.

**Supplier Registration**. Burns & McDonnell requires all suppliers to complete and maintain a current supplier registration before being awarded an order or contract. Registrations are considered current for one calendar year, starting from the date they were last reviewed. Existing vendors, subconsultants, and subcontractors must update their registration information at least every 12 months.

To register, suppliers provide a range of detailed information including information about their corporate registration, ownership, affiliates, licenses, certifications, past experience, projects, management systems, financial status, bonding, and insurance. Suppliers are required to provide disclosures regarding any regulatory infractions or criminal sanctions. Suppliers must also provide details on their health, safety, and environmental performance.

**Use of Reputable Suppliers**. Once a supplier is registered, their information is available to project teams for project-specific prequalification. Project teams are then responsible for prequalifying suppliers they are interested in working with by assessing the supplier's capabilities and working with the relevant departments to determine whether a supplier will be a good fit for the specific project at hand.

In registering and prequalifying suppliers, Burns & McDonnell looks for reputable suppliers that align with our values. We seek suppliers who demonstrate commitments to safety and quality, who have a proven record of performance, financial stability, and on-schedule delivery, and who understand the industry.

**Supplier Code of Conduct**. Burn & McDonnell's <u>Supplier Code of Conduct</u> defines our expectations of suppliers in relation to their work with Burns & McDonnell, which include compliance with all applicable laws. The Supplier Code of Conduct addresses a range of topics related to ethical conduct and integrity, which include statements on forced labour, child labour, and human trafficking. The Supplier Code of Conduct prohibits a supplier from engaging in these activities and sets out minimum standards for supplier employment practices.

Burns & McDonnell expects all suppliers to subscribe to our ethical standards and does not condone any illegal or unethical actions on the part of any supplier. Potential suppliers are required to acknowledge the Supplier Code of Conduct as part of the registration process. Suppliers are obligated by our standard contract terms to comply with the Supplier Code of Conduct.

**Additional Policies**. Burns & McDonnell's anti-harassment policy prohibits discrimination and harassment, including verbal, nonverbal, visual, and physical conduct and threats. We also operate a robust background screening policy. These

policies help safeguard against human trafficking and protect against retaliation. They are available to all employees on our intranet site, MacCentral.

**Corporate Social Responsibility.** Burns & McDonnell's approach to social responsibility considers several facets including diversity, equity and inclusion (DE&I), community impact, and sustainability. As part of our social responsibility commitments, our parent company publishes an annual <u>Corporate Sustainability Report</u>.

#### Forced Labour and Child Labour Risks

The goods that Burns & McDonnell procures from its suppliers are often complex, engineered equipment, and are made up of a wide range of commodities and components such as steel, aluminum, copper, and alloys, glass, ceramic, rubber, and composites, oil products and plastics, and a variety of mined minerals. After identifying the categories of goods that we procured in 2024 and the primary sources of those goods, as outlined above, we reviewed the list of goods produced with forced labour and/or child labour as prepared by the US Department of Labor (USDL). Based on the USDL list, none of the goods directly procured by Burns & McDonnell are considered high risk for the use of either forced labour or child labour. However, Burns & McDonnell recognizes that commodities used in some of these goods are at risk for the use of forced labour or child labour. The commodities on the USDL list that may be included in the goods we procure are aluminum, cobalt ore, copper ore, electronics components, gold, iron, lithium, polysilicon, rubber, silver, tantalum, tungsten, and zinc.

#### Remediation Measures

The preventative measures that Burns & McDonnell has taken are described above. No measures have been taken at this time to remediate specific instances of forced labour or child labour that exist in our activities and supply chains.

#### Remediation of Loss of Income

No measures have been taken at this time to remediate loss of income to vulnerable families from any measure taken to eliminate the use of forced labour or child labour that exist in our activities and supply chains.

## **Training**

All employees complete mandatory training on our Business Conduct Guide. No mandatory training is established at this time specific to forced labour or child labour. Voluntary training on forced labour, child labour, and supply chain transparency is available to Burns & McDonnell through our internal learning platform.

## **Assessing Effectiveness**

No actions have been taken at this time to assess the effectiveness of our measures to prevent and reduce risks of forced labour and child labour.

#### Attestation for Burns & McDonnell Canada Ltd.

In accordance with the requirements of the *Act*, and in particular section 11 thereof, I, in the capacity of Vice President, attest that I have reviewed the information contained in the Report on behalf of the governing body of 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 listed within this report.

Darcy J. Wagner

Vice President, Burns & McDonnell Canada Ltd.

May 30, 2025

I have the authority to bind Burns & McDonnell Canada Ltd.

Attestation for Burns & McDonnell Engineering Company, Inc.

In accordance with the requirements of the *Act*, and in particular section 11 thereof, I, in the capacity of Vice President, attest that I have reviewed the information contained in the Report on behalf of the governing body of 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 listed within this report.

Michael W. Brown

Vice President, Burns & McDonnell Engineering Company, Inc.

May 30, 2025

I have the authority to bind Burns & McDonnell Engineering Company, Inc.