

Modern Slavery Act Report

Financial Year

January 1, 2023–

December 31, 2023

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1. The Reporting Company

This report is made by Bantrel Co. (“**Bantrel**”) pursuant to the reporting requirements of Part 2 of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Modern Slavery Act**”) and constitutes its annual report for the financial year ended December 31, 2023 (the “**Reporting Period**”).

Bantrel is an unlimited liability company incorporated in Nova Scotia (company number 3062920) with its head office in Calgary, Alberta. Bantrel is a subsidiary of Northbech Co., a Nova Scotia company that is part of the Bechtel global group of companies. Northbech Co. is a controlling shareholder of Bantrel. It has filed a separate annual report under the Modern Slavery Act jointly with a number of Bechtel’s other subsidiaries. The “Bechtel group of companies” or “Bechtel” refers to Bechtel Group, Inc. and its direct and indirect subsidiaries, collectively.

This report discusses the risks of modern slavery, including forced labour and child labour as defined in the Modern Slavery Act, in Bantrel’s operations and supply chains and the actions Bantrel has taken during the Reporting Period to address and mitigate those risks.

Bantrel’s board of directors approved this report on May 8, 2024.

2. Our Business

Bantrel is a provider of engineering, procurement, and construction (EPC) services in Canada. Since 1983, we have delivered end-to-end solutions for some of Canada’s most challenging and complex energy projects. In addition to having core business operations in energy and sustaining capital industries, Bantrel also provides EPC services to infrastructure, mining, and nuclear clients .

Bantrel is a Canadian company with corporate office locations in Calgary, Edmonton, and Toronto. We help clients complete multiple small- and large-scale projects in Canada and the United States.

We provide services in four market segments:

- Energy
- Mining & Metals
- Nuclear
- Infrastructure

During the Reporting Period, Bantrel operated across energy, mining & metals and infrastructure market segments in Alberta, Ontario, British Columbia, New Brunswick, and Saskatchewan, and our activities included EPC and Construction Management. In addition, during the Reporting Period Bantrel provided services for multiple US projects from Canada through various Bechtel entities, including projects in Louisiana, California, Georgia, New Mexico, Nevada, and Texas.

As a member of the Bechtel group of companies, many of Bechtel’s principles, policies, guidelines, and functional procedures also apply to Bantrel. However, Bantrel also has certain policies of its own, and has its own procurement team. Core to Bantrel are our *Mission Statement and Values*. They are what we believe in, what our clients expect, and how we deliver. Consistent with our Values and Mission Statement, we are dedicated to upholding and respecting human rights everywhere we operate and treating people with the utmost respect. We expect our business partners, contractors, and suppliers to do the same.

3. Risk Assessment and Management

Bantrel has both corporate offices (Calgary, Edmonton, and Toronto) and temporary project offices or sites, all of which are located in Canada. The corporate offices support core business functions and provide centralized support services to our project offices and/or sites. The temporary project offices and sites provide the on-the-ground day-to-day work needed to manage, design, and build our clients' complex projects. Our project offices and sites are geographically dispersed across Canada. In addition, Bantrel also supports Bechtel projects across the United States, with such services performed from within Canada.

Within our Bantrel-controlled corporate offices and the temporary project offices and sites that Bantrel controls, we follow a robust set of corporate and human resources policies and processes which comply with Canadian law. Risk mitigation measures include our supervisor training program, a workforce primarily comprised of highly skilled professionals, and office workers as well as workers who are permanent residents of Canada. Canada has strong worker welfare and employment laws, and modern slavery risk is lower according to the Global Slavery Index. Therefore, we consider the overall risk of modern slavery at Bantrel offices and locations to be low.

Potential risks for modern slavery and human trafficking are greater in some of our temporary projects and the global supply chain serving them, including the goods and services sourced. Our projects may have complex partnering and joint venture arrangements that permit Bantrel different levels of authority, control and influence, and may rely on numerous international suppliers and subcontractors to deliver the equipment and materials needed to engineer and build our clients' projects.

In terms of areas of greater risk, projects that involve a construction scope of service may have a higher risk of modern slavery than project services involving front-end engineering and design, study or project management consulting (PMC) services, particularly if they involve temporary foreign workers. Bantrel-controlled Canadian projects will only use temporary foreign workers when qualified Canadians are not available, and in such cases follow Government of Canada programs as applicable. During the Reporting Period, Bantrel did not engage any temporary foreign workers.

We note that PMC services may involve helping our clients manage their procurement or construction projects where Bantrel has less visibility into client procurement supply chains, or the client's construction labour force used in those projects. That said, many of our clients utilise a robust flow down of contractual terms and conditions to reduce the risks of modern slavery in their supply chains, and audit against it on an annual basis.

Finally, projects with large procurement scopes involving obtaining materials and services required to construct large and/or complex projects can be of higher risk because of the complexity and scale of the global supply chains.

With respect to our supply chain, during the Reporting Period, Bantrel's procurement and contracts group worked with approximately 185 tier 1 suppliers of equipment, materials, and services from 5 countries (Canada, U.S., Netherlands, Germany, and United Kingdom) and issued 1184 transactions. Of this total amount, approximately 77% was committed in our role as agent for clients. The vast majority of our tier 1 suppliers are located in North America, with 56% located in Canada and 43% in the U.S. Our largest categories of purchased goods and services are engineered equipment, general office supplies and services, and computer hardware/software.

We continue to review the methods used to identify, screen, award, and monitor suppliers for modern slavery and human trafficking risk.



a. Steps Taken During 2023 To Prevent or Reduce the Risk of Forced Labour and Child Labour

As described more fully in the above sections, the following are some of the steps taken by Bantrel during the 2023 *financial year to prevent or reduce the risk of forced labour and child labour*:

- Maintained policies, systems, and processes aimed at respecting human rights and avoiding complicity in any practice that constitutes human trafficking or slavery.
- Made clear that we are committed to ensuring that there is no form of modern slavery (including forced labour or child labour) or human trafficking in our supply chain or in any part of our business. This includes within the performance of client-specific contracts by our employees, contractors, business partners, or suppliers.
- Required that employees immediately report any concerns about any issue or suspicion of modern slavery, including child labour, through the multiple reporting avenues via Bantrel Ethics Helpline directly or to the Ethics Officer, or, for our BHP Jansen project, employers and suppliers may use either the Bantrel Ethics Helpline or the BHP Ethicspoint reporting lines.
- Promoted the use of and specified the purpose of the Ethics Helpline by internet, email, and phone.
- Conducted appropriate upfront risk assessments, including identifying sustainability risks, which includes risks to the safety and well-being of the people and communities who can be affected by our projects.

- Conducted due diligence before entering project-specific or multi-project joint associations, including joint venture or consortium partners, to ensure that the proposed third-party associate has ethical standards policies and procedures compatible with our own.
- Made available to all Bantrel employees our online course entitled “Human Trafficking and Modern-Day Slavery.”

b. Human Rights Policy

Bantrel maintains systems and processes to avoid complicity in practices that constitute human trafficking or slavery. In 2024, Bantrel implemented a Human Rights (Fighting Against Forced Labour) policy that, consistent with Bechtel, reflects our commitment to maintaining a work environment free from human trafficking, slavery, servitude, forced labour and child labour. Bantrel operates in accordance with the spirit and intent of the United Nations Guiding Principles on Business and Human Rights.

c. Ethics and Compliance

Bantrel follows Bechtel's [Code of Conduct](#), which is published in seven languages and makes clear that we are committed to ensuring that there is no form of modern slavery (including forced labour or child labour) or human trafficking in our supply chain or in any part of our business and that Bantrel does not tolerate the use of either in the performance of Bantrel contracts by our employees, contractors, business partners, or suppliers. The Code of Conduct instructs employees to immediately report any concerns about any issue or suspicion of modern slavery or human trafficking to their supervisor, Ethics & Compliance Officer, the Legal Department, or the [Ethics HelpLine](#). Our employees are responsible for complying with our policies and the Code of Conduct, and violation of them is subject to discipline, up to and including termination.

Bantrel encourages our employees, suppliers, subcontractors, and other third-party business partners to ask questions about our Code of Conduct and to report any issues, concerns, or suspicions of modern slavery or human trafficking. We have an Ethics HelpLine available as a confidential resource on the internet at HelpLine.Bechtel.com, by email at ethics@bechtel.com, or by phone at 1-800-BECHTEL (1-800-232-4835) from the United States and Canada, 0800-206-1009 from the UK, and 1-800-316-704 from Australia. Where permitted by law, the Ethics HelpLine allows anonymity. We do not tolerate threats or acts of retaliation against anyone for raising legitimate concerns, and we are committed to addressing each concern in a prompt and responsible manner.

In addition to our own Ethics Helpline, there may be reporting mechanisms put in place by clients on larger projects. For our BHP Jansen project, for example, the BHP Ethicspoint reporting line is also in place.

d. Training and Awareness

The Bechtel online course entitled “Human Trafficking and Modern-Day Slavery” is available to all Bantrel employees. It focuses on how to identify the warning signs of modern slavery and how to manage it, and it incorporates assessments requiring the application of training knowledge to potential real-world scenarios. The course is mandatory for specific functions of employees who, due to the nature of their work or function, may be more likely to encounter signs of modern slavery. During the Reporting Period, it was taken on a voluntary basis by members of the Bantrel procurement team.

In addition, all Bantrel employees are required to attend an annual in-person ethics workshop. During the Reporting Period, workshop topics included human rights-related topics such as racism in the workplace, bullying and health and safety risks.

e. Upfront Risk Assessment and Mitigation Planning

Bantrel policy requires an upfront risk assessment before a commitment can be made to a client's project. This includes identifying risks to the people and communities who can be affected by our projects, as well as reputational risks arising from association with or performance of services for a client whose reputation for business practices and ethics does not match our own.

Similarly, Bantrel policy requires due diligence and corporate approval before entering project-specific or multi-project joint associations, including joint venture or consortium partners, to ensure that the proposed third-party associate has ethical standards, including human trafficking policies and procedures that are comparable to our own. Joint association approval requests must address any character, reputation, ethics or compliance issues and the proposed associate's commitment to Bantrel standards regarding ethics, legal compliance, health, safety, the environment, and sustainable development. This upfront risk assessment encourages early and proactive risk mitigation planning and actions, including human trafficking policies and procedures.

f. Temporary Foreign Workers

The technical challenges of large engineering and construction projects combined with the occasional lack of sufficiently skilled craft professionals means that some of our clients' projects may require the recruitment of temporary foreign workers ("TFWs"). The recruitment and employment process of craft professionals varies from project to project. Bantrel, a joint venture partner, or subcontractors may have varying levels of responsibility or shared responsibility over the process of hiring workers. However, regardless of who has the responsibility, Bantrel seeks clients, partners, and subcontractors who share our values and promote global standards of ethical business conduct through these relationships. We follow Canadian legislation related to employment of TFWs and Bantrel's recruitment and employment of TFWs follows a consistent approach which includes ethically recruiting and managing TFWs. During the Reporting Period, Bantrel did not hire any TFWs. If Bantrel were to hire TFWs, our guiding principles (which are consistent with those of Bechtel) include, but are not limited to:

- Relevant policies and procedures should treat TFWs fairly and without any form of discrimination.
- Contract terms and conditions should be written and communicated in a manner that is understood by TFWs, and employment should be with a recognized and authorized employer in the country of work.
- National passports, identity, and residency documents will not be held by Bantrel.
- Wages should be paid regularly and directly to TFWs per contract terms.
- TFWs will be provided with humane, safe, and secure working conditions, and, where applicable for the project, accommodation, and transportation between the work site and living quarters.
- TFWs should not be subjected to any form of intimidation or inhuman treatment, including in disciplinary matters.

- Access to mechanisms to file a human resources complaint and the complaint resolution processes are provided to TFWs without fear of retaliation or dismissal.

Our contracts for recruitment services state that Bantrel does not tolerate activities that support trafficking in persons, including the use of slavery, forced labour, child labour, or human trafficking, and requires the contractor to represent that it will adhere to these standards and not use any form of forced, bonded, compulsory labour, slavery, or human trafficking.

g. Supply Chain

Bantrel manages modern slavery and human trafficking risks in our supply chain by establishing clear expectations with our suppliers, conducting due diligence reviews of suppliers, incorporating terms and conditions relating to modern slavery and human trafficking in awarded contracts, and conducting in-shop or desktop reviews of suppliers during performance to identify potential issues.

Setting Clear Expectations

We set clear expectations related to human rights and anti-slavery for our supply chain through the Bechtel-managed [Suppliers & Contractors Portal](#), [Supplier Guide: Executing Work with Bechtel 2023](#), and [Bechtel's Expectations for Suppliers' and Subcontractors' Conduct](#).

In addition to stating Bechtel and its subsidiaries, including Bantrel, do not tolerate the use of slavery, servitude, forced or compulsory labour, or human trafficking, these publications provide that we expect suppliers and subcontractors to:

- Employ workers above the applicable minimum age requirement.
- Maintain a workplace free from threats of violence, physical abuse, or other conduct that fails to respect the safety and dignity of the worker.
- Comply with applicable wage laws and, upon the end of employment, pay return transportation costs for workers recruited from outside the country.
- Not charge workers' recruitment fees or utilize firms charging workers such fees, and not utilize fraudulent or misleading recruitment practices.
- Not withhold a worker's passport or immigration documents.
- Provide workers with a process for escalating and reporting concerns without retaliation.
- Develop policies prohibiting slavery and human trafficking and train their staff on how to identify such practices.
- Contractually require their suppliers to conform to the same standards.

In addition, although Bantrel is not a manufacturer and is a privately-held company, we expect our suppliers to adhere to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to prohibit the use of conflict minerals (gold, tungsten, tantalum, and tin) from the Democratic Republic of the Congo or adjoining countries. Suppliers are expected to conduct due diligence to preclude the sales or installation of any materials or equipment that contain conflict minerals.

Identifying, Selecting, and Contracting with Suppliers

Suppliers managed by our Procurement function go through a restricted parties list review that vets the suppliers across 40 different databases, identifying companies with a human trafficking history. We also review all suppliers against our internal warnings and advisories, which identifies concerns raised in the performance of prior work with Bantrel. Bantrel may engage joint venture partners or exclusive subcontractors before bid submission. Before Bantrel contracts with them, these companies undergo an enhanced due diligence review that involves questionnaires and screening for any ethics and compliance red flags, including modern slavery and human trafficking.

Once vetted and selected, Bantrel's standard contract terms and conditions require that no human trafficking or slavery is used anywhere in the supplier's or subcontractor's business or by any of the suppliers or subcontractors in its own supply chain. Bantrel seeks to implement its standard terms and conditions or equivalent terms on human trafficking or slavery. Our suppliers and subcontractors agree to comply with all applicable local and national laws and regulations. We have the right to terminate contracts with suppliers and subcontractors that breach our terms and conditions.

Our standard terms and conditions also provide that, at the project site, all suppliers and subcontractors must comply with Bantrel's rigorous safety and health plan. This plan includes Bantrel's core processes for safety and health to ensure that all workers—both Bantrel's and its supply chain's—adhere to our zero-accident values.

h. Assessing Effectiveness by Audit

Audits are an important tool in ensuring that corporate policies and procedures relating to human trafficking and slavery are being implemented and cascaded throughout the Bechtel group of companies and that contract provisions relating to the same are being complied with.



Corporate Internal Audit

Bantrel's internal audit function is performed by the Bechtel Internal Audit team and provides an independent evaluation of internal controls over: (i) compliance with policies and procedures; (ii) the reliability and integrity of information provided to management; and (iii) processes that safeguard the group of companies' assets. In addition, when project payroll is audited, Bechtel Internal Audit monitors whether hours worked by project personnel are potentially at risk of violating local labour laws. Bechtel Internal Audit identifies projects for inclusion in its annual audit plan through an assessment of risk attributes of active projects. The risk attributes that overlap with modern slavery risks are that country of execution, and the procurement and construction scopes of work. Bantrel entities and projects are audited based on risk; not all are audited annually.

Client Audits

In addition to Bantrel-initiated audits of our supply chain, our clients may have the contractual right to audit us, including our supply chain-related policies and due diligence processes. On our BHP Jansen project, for example, each contractor and supplier contract clearly lays out the expectations related to human trafficking and slavery and the client has the right to audit compliance with the contractual obligations and the Modern Slavery Act.

Project Execution or Management Plans

Project execution plans are a tool for ensuring the effectiveness of policies and contract provisions including those relating to human trafficking and slavery. To build employee awareness and support compliance with these requirements, training related to combating trafficking of persons is to be included in project training programs where there is a risk identified.

i. Remediation

During the Reporting Period, neither Bantrel nor Bechtel identified any instances of forced labour or child labour in Bantrel's operations or supply chain. As a result, there is nothing to report with respect to measures taken to remediate (i) instances of any forced labour or child labour, or (ii) the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

4. Attestation

This report was approved pursuant to subparagraph 11(4)(a) of the Modern Slavery Act by the board of directors of Bantrel Co.

In accordance with the requirements of the Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects, for the purposes of the Modern Slavery Act, for the reporting year listed above.

I make the above attestation in my capacity as a director of the board of directors of Bantrel Co. for and on behalf of the board of Bantrel Co.
I have the authority to bind Bantrel Co.

Per: Darren Curran

Full Name: Darren Curran

Title: Director

Date: May 23, 2024