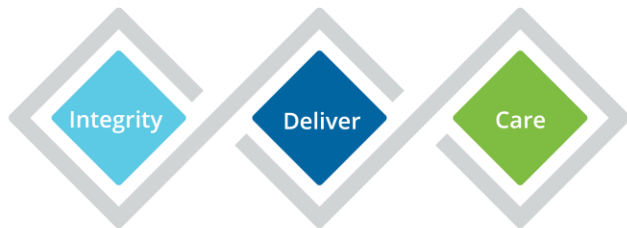




Modern Slavery Act Report

Financial Year: January 1, 2024 – December 31, 2024



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Building Canada's Future

THE REPORTING COMPANY

This report is made by Bantrel Co. ("Bantrel") pursuant to Part 2 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Modern Slavery Act") and covers the financial year ending December 31, 2024. Bantrel is a provider of engineering, procurement, and construction (EPC) services in Canada, and is a limited liability company (company number 3062920) incorporated in Nova Scotia and headquartered in Calgary, Alberta.

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.

OUR BUSINESS

Since 1983, Bantrel has delivered EPC solutions for energy, mining, nuclear, and infrastructure projects. The company operates corporate offices in Calgary, Edmonton, and Toronto, as well as temporary project offices across Canada. Bantrel follows many of Bechtel's corporate policies, guidelines and procedures, but also maintains specific Bantrel policies.

Bantrel's operations involve large-scale engineering and construction projects, requiring engagement with a diverse network of suppliers, contractors, and workforce solutions. Given the nature of the industry, ensuring ethical labour practices and avoiding exploitative conditions within the supply chain is a key focus. 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.

MARKET SEGMENTS & SERVICES

- **Energy**
- **Mining & Minerals**
- **Nuclear**
- **Infrastructure**
- ***Engineering***
- ***Procurement***
- ***Construction***
- ***Construction Management***

RISK ASSESSMENT AND MANAGEMENT

Bantrel operates in a low-risk environment for modern slavery, given Canada's strong worker welfare laws. However, risks arise in temporary projects, complex supply chains, and international supplier engagements. Risks are higher in construction projects and large procurement scopes, particularly where raw materials, outsourced labour, or subcontracted services are involved.

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.

KEY RISK AREAS

- **Procurement & Supply Chains:** Given Bantrel's extensive supplier network, there is a risk of unethical labour practices among subcontractors, raw material suppliers, and third-party labour providers.
- **Geographic Exposure:** While most of Bantrel's suppliers are based in Canada and the U.S., sourcing from international markets, especially in high-risk regions, requires additional due diligence.
- **Temporary & Contracted Labour:** Construction and engineering projects often involve subcontracted labour, where exploitative practices may be more prevalent.
- **Raw Material Sourcing:** Products such as metals, textiles, and specialized components may originate from regions with less robust labour protections.

RISK MITIGATION MEASURES

- **Legal Compliance & Oversight:** Bantrel strictly follows Canadian employment laws and international human rights regulations. Employment contracts align with legal standards, ensuring fair wages, working conditions and wage requirements.



- **Supplier and Contractor Screening:** A robust due diligence process ensures suppliers and contractors comply with safety, environment and labour laws. Corporate background checks, ethical sourcing assessments, anti-corruption and slave labour assessments are mandatory.
- **Worker Protection:** Bantrel prioritizes hiring highly skilled professionals and enforces employment practices to minimize risks associated with third-party labour providers.
- **Policy Framework:** Bantrel maintains and enforces Business Ethics, Respectful Workplace and Human Rights Policies, that strictly prohibit forced labour and child labour.
- **Whistleblower Mechanisms:** Employees, suppliers, and stakeholders have access to an anonymous Ethics Helpline for reporting concerns related to forced labour or unethical practices.

- **Foreign Worker Protections:** No temporary foreign workers were engaged during the reporting period.
- **Supplier Due Diligence:** Suppliers are screened through a restricted parties list, compliance reviews, and risk assessments. High-risk suppliers are subject to enhanced vetting, including audits and on-site inspections when deemed necessary.
- **Contractual Safeguards:** Standard contract terms prohibit forced labour and child labour, with clear enforcement mechanisms, including termination rights and penalties for non-compliance.
- **Incident Reporting & Response:** Bantrel maintains a structured response protocol for addressing allegations of forced labour or unethical practices, ensuring rapid investigation and remediation.
- **Audits & Assessments:** Bechtel Internal Audit assesses modern slavery risks within Bantrel's operations and supply chain. Additionally, clients may conduct independent audits to verify compliance.

POLICIES & COMPLIANCE

Bantrel has implemented a Human Rights (Fighting Against Forced Labour) policy in alignment with the UN *Guiding Principles on Business and Human Rights*, reinforcing ethical commitments across all business activities.

Additionally, supply chain management process and vendor screening guidelines are deliberately designed to identify potential risks prior to final engagement.

TRAINING & AWARENESS

Employees have access to the *Human Trafficking and Modern-Day Slavery* online course. Annual ethics workshops which are mandatory for all employees and targeted training sessions for procurement and HR teams ensure awareness and compliance.

SUPPLY CHAIN MANAGEMENT

The primary procurement categories include engineered equipment, office supplies, and computer hardware/software, with additional sourcing for construction materials, professional services, and skilled construction labour.

- **Geographic Spread:** Bantrel sources materials and services from Tier 1 suppliers, with geographic distribution as follows: Canada (90%), U.S. (10%), and select engagements in the Netherlands, Malta, Germany, and Czechia.
- **Supplier Expectations:** All suppliers and subcontractors are required to adhere to ethical employment practices, including zero tolerance for forced labour, no recruitment fees, respect for workers' rights, and compliance with international labour standards.

- **Third-Party Labour Risks:** All subcontractors are required to adhere to Bantrel's strict ethical labour policies. Supplier assessments are conducted, screening completed and contracting documented, and process audits are conducted to ensure compliance.

ASSESSING EFFECTIVENESS & REMEDIATION

- **Audits & Inspections:** Regular external and internal audits are conducted to assess modern slavery risks and supplier compliance. Where gaps are identified, corrective actions are mandated.
- **Employee and Contractor Training:** Ongoing training programs reinforce policies and obligations, equipping employees with the knowledge to identify and report potential risks.
- **Zero Incidents in 2024:** No cases of forced labour or child labour were identified during the reporting period.

Bantrel remains committed to upholding human rights, preventing modern slavery, and ensuring ethical business practices across its operations and supply chains. Continuous improvements and industry best practices will guide future enhancements in due diligence, monitoring, and reporting.

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 28, 2025

