

Forced Labour and Child Labour Report

for Fiscal Year end October 31, 2025

Opening Statement

Black & McDonald Limited (“B&M”) recognizes the existence of forced labour and child labour in the global market and its resulting adverse effects on vulnerable workers. As leader in construction, B&M strives to ensure that there is no forced labour or child labour in its supply chain.

This joint report is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) by B&M on behalf of itself and its subsidiaries that constitute an “entity” under the Act.

B&M has conducted a review of its 2025 operations and did not find any evidence of forced labour or child labour at B&M. Based on its diligence with respect to suppliers, B&M does not believe there is forced labour or child labour in B&M’s supply chain.

About Black & McDonald

Black & McDonald Ltd. was established in 1921. From its start in 1921 as an electrical wiring contractor, B&M has grown to multiple lines of business with more than 6,800 employees working out of 40+ offices across Canada and the US, and has become one of North America's most respected integrated, multi-trade service providers. Today, B&M remains a family-owned and operated business with its head office in Toronto.

Suppliers

B&M has over 1000 suppliers, most of which are located in Canada and the US. Less than 0.01% of B&M's suppliers are located outside Canada and the US.

B&M has policies, codes and other requirements that prohibit the use of forced labour and child labour by its supply chain. As part of B&M's subcontract prequalification process, subcontractors must agree that they will not use forced labour or child labour. In addition, each time B&M engages a supplier, they agree, as part of the purchase order, that they will not use forced labour or child labour.

As a large company that has been in business for over 100 years, B&M has strong relationships with reputable suppliers. Should B&M ever become aware that a supplier is using forced labour or child labour, B&M will work with the supplier to see if the practice can be eliminated. Should elimination not be possible, B&M will seek out alternative supplier(s) immediately.

B&M Policies

B&M takes its social responsibility to ensure there is no forced labour or child labour very seriously.

To that end, B&M:

- Makes employees aware they are free to terminate their employment at any time.
- Ensures all employees meet the applicable minimum legal age requirement by checking ID at time of hire.
- Ensures employees are aware of B&M's Labour Exploitation Policy, which prohibits forced labour and child labour. For employees this is included in our New Hire Orientation and is reinforced as part of B&M's Annual Compliance Training.
- Provides employees multiple avenues to report suspected violations of the policy.
- Requires that employees review and sign off on the B&M Code of Conduct annually to ensure employees understand their legal and ethical responsibilities generally and specifically with respect to forced labour and child labour policies, as well how to report suspected breaches.

B&M ensures that employee compliance with the Act is abided by all employees, by educating employees on it both at the time of hire and annually thereafter. The whistleblower policy ensures that B&M employees have reliable and safe avenues to express their concerns about the occurrence of illegal activities or otherwise unethical behaviour.

Due Diligence on Supply Chain

B&M also exercise reasonable due diligence to safeguard against the purchase of services or goods from subcontractors and suppliers that use forced labour or child labour. To that end, B&M:

- Requires each subcontractor to annually review and agree to abide by B&M's Labour Exploitation Policy, which prohibits forced labour and child labour by subcontractors. This must be done on an annual basis in order to work with B&M.
- Engages each supplier on B&M's standard form purchase order, which requires each supplier to abide by B&M's Labour Exploitation Policy, which prohibits the use of forced labour and child labour in its supply chain. This agreement is entered into on a job by job basis.
- Subcontractors must also review and sign the B&M Code of Conduct on an annual basis, which requires Subcontractors to behave ethically.
- Subcontractors are also engaged on a standard form subcontract for each project, which requires them to abide by applicable law, including the Act.
- The B&M Code of Conduct also provides subcontractors with multiple avenues to report suspected violations of the Code and the Labour Exploitation Policy.

Buy from Canadian and US suppliers and manufacturers. In the event this is not possible (less than 1%), due diligence on supplier is required (e.g. questionnaires and strict compliance to B&M's Forced Labour and Child Labour Policies).

B&M has a Supplier Evaluation Procedure, which requires B&M to audit a supplier if B&M perceives or foresees any risk.

Ensuring subcontractors and suppliers are adhering to forced labour and child labour laws is important to B&M, so B&M formally requires them to agree to not violate the Act in the ways noted above. The Code of Conduct also provides subcontractors with multiple safe avenues to express concerns about the occurrence of illegal behaviour, including suspected breaches of the Act.

Managing Supply Chain Risks

As B&M purchases materials and engages subcontractors, there is some risk associated with non-compliance of suppliers and subcontractors. While B&M is exercising reasonable due diligence, it does not always have visibility on the whole supply chain.

This risk is mitigated however, by B&M's policies, the Code, the terms of the purchase order and prequalifying our subcontractors. In addition, B&M's whistleblower policy provides multiple avenues to report suspected breaches and suspected breaches. Any reported breaches are investigated in a comprehensive and impartial manner.

Remediation of any Forced or Child Labour

There were no instances of forced or child labour within B&M or within its supply chain that were detected or reported to B&M. As such, no remediation measures were necessary.

Remediation of Loss of Income

As there was no evidence of forced labour or child labour at B&M or within its supply chain, there is no resulting loss of income to vulnerable workers or families to be remediated.

Educating Employee on Forced Labour and Child Labour

B&M educates employees on its Labour Exploitation Policy at the time of hire and annually as part of its Compliance Training. The Senior Management Team is aware of and fully supports enforcement of the Labour Exploitation Policy.

Assessing the Effectiveness of B&M Efforts to Protect Against Forced Labour and Child Labour

B&M is committed to preventing the use of forced labour and child labour in its supply chain. To that end, B&M has dedicated the resources of Procurement, Legal and People Resources to develop the existing framework to combat such use. All B&M employees are aware of the prohibition on forced labour and child labour and are continually re-educated on same.

B&M engages with quality subcontractors and suppliers and trusts that they too comply with their contractual obligations and all applicable laws.

Approval and Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, I attest that I have reviewed the information contained herein for B&M and its subsidiaries that are an “entity” under the Act. Based on my knowledge, after exercising reasonable due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the financial year ending October 31, 2025.

I have authority to bind B&M.



Christina O'Donnell
Vice President, Legal and General Counsel

Date: April 9, 2026