



## **2025 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act***

### **Introduction**

This report has been prepared by the B&B Contracting Group ("B&B Contracting") in response to the requirements under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for our financial year ending December 31, 2024.

Our approach to preventing and reducing the risk of forced labour and child labour in our construction activities and supply chains has focused on monitoring the health and safety of workers on our sites and requiring our suppliers and contractors to comply with applicable laws relating to Canadian employment, labour relations, human rights and safety.

### **Organizational structure, activities, and supply chain**

The B&B Contracting Group consists of the following entities:

- B&B Contracting (2012) Ltd.,
- Bailey Ventures Ltd.,
- A&A Testing Ltd.,
- B&B Heavy Civil Construction Ltd.,
- B&B Concrete Ltd.,
- B&B Group Holdings Ltd.,
- B&B Excavations & Shoring Ltd.,
- 0997082 BC Ltd.,
- 1107507 BC Ltd.,
- Westcan Rail Ltd., and
- Western Canada Rail Contractors Corp.

B&B Contracting has operated in Canada for more than 70 years. Our head office is in Surrey, British Columbia. We employ approximately 650 employees. Most of our employees are unionized. We do not hire temporary workers or use labour intermediaries.

We are a civil construction contractor that provides construction services to private, commercial, municipal, and federal clients in the Greater Vancouver area. Our construction projects include highways, bridges and industrial buildings, providing civil contracting services such as site preparation, utilities, roadwork and excavation, and testing services such as inspections, air and water testing and sewer cleaning. We are an active member of various industry associations, including BC Construction Safety Alliance.

Our projects require us to procure construction materials and equipment that vary depending on the scope of the project. Materials may include steel, concrete, aggregates, fuel, mechanical equipment, pipe, and other typical construction materials. We procure most of these materials from Canadian distributors, but import some materials, including steel, from the United States. The supply chain for our construction activities is closely aligned with the location of our work sites in British Columbia.

## **Steps to prevent and reduce the risks of forced labour and child labour**

In this reporting year, B&B Contracting took the following steps to prevent and reduce the risks of forced labour or child labour in our operations and supply chain:

- Continue implementing workplace safety and human rights programs and verifying age requirements in accordance with applicable Canadian employment laws
- Use questionnaires, declarations and contractual clauses to ensure direct suppliers and subcontractors follow safety requirements and comply with employment, human rights and safety laws on our sites
- Monitor our direct suppliers and subcontractors to comply with employment, human rights and safety laws through routine management visits
- Procure construction materials from reputable, long-term Canadian suppliers

## **Policies and due diligence processes**

B&B Contracting's policies and processes focuses on the impact of workers in our construction activities in British Columbia and engaging with suppliers and contractors to ensure compliance with applicable employment, human rights and safety protections for workers.

To prevent the use of forced labour and child labour in our operations, B&B Contracting has adopted procedures to comply with applicable laws relating to health and safety, human rights, and employment standards regulations governing our hours of work, safe working conditions, and age of employment. These procedures apply to all employees, temporary workers, and contractors. We are certified under the Certificate of Recognition (COR) program in British Columbia, which recognizes companies who develop and implement health and safety and injury management systems that meet an industry standard. B&B has been COR certified for over a decade and employs a highly qualified Health and Safety Team to create, administer, and maintain our comprehensive Occupational Health and Safety Program and our Injury Management & Return to Work Program. B&B Contracting has also met the requirements for certification for ComplyWorks and ISNetworld.

In our supply chains, we are committed to doing business with reputable, ethical suppliers. We rely on our suppliers to adopt responsible business practices. Our suppliers are in Canada and the United States, and therefore subject to provincial, state, and federal laws governing working conditions and age of employment. We select our suppliers based on their reputation as well as the quality of their goods and services. We use questionnaires, declarations and contractual clauses to ensure the suppliers and subcontractors on our worksites follow our safety requirements and comply with employment, human rights and safety laws.

## **Assessing the risk of forced labour and child labour**

B&B Contracting's operations and direct suppliers operate in Canada, where worker rights are protected under the employment, labour, human rights and safety laws. For these reasons, we have identified the risk of forced labour and child labour in our operations and direct supply chains to be low.

We do not have visibility over our suppliers' extended supply chain and rely on our suppliers to adopt due diligence processes and policies to ensure no forced labour or child labour is used in the production of their goods. We will review our approach to risk assessment with our supply chain partners as transparency over Canada's supply chain increases.

## **Remediation measures and remediation of loss of income**

B&B Contracting has established policies and processes that encourage workers to report concerns relating to health and safety or other human rights. To date, we have not received any complaints relating to forced labour or child labour in our operations or supply chain, and as such has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

## **Employee training**

All workers are required to undergo site safety briefings prior to entering site and to attend mandatory training relating to compliance with health and safety regulations. In this reporting year, we did not provide training to employees specifically on the risks of forced labour or child labour in the supply chain.

## **Assessing effectiveness**

B&B Contracting monitors compliance of our workers, contractors and suppliers with the standards set out in our Safety Policy and participates in voluntary certification audits of our safety and injury management systems. In this reporting year, we did not adopt assessment measures relating to forced labour or child labour in our supply chain.

## **Approval and attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities 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 above.

Dated in the City of Surrey, British Columbia, this 1 day of May, 2025.

*Fraser Bruce*

Fraser Bruce, Director

I have the authority to bind B&B Contracting Ltd.