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Bill S-211

An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Modern Slavery Statement for the Financial Year ended 2024

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by Hatch Ltd. to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing October 1st and ending September 30th 2024..

Who We Are

We provide professional engineering, technology, and consulting services to the metals, energy, and infrastructure market sectors. Founded more than sixty-five years ago, our global staff of 10,000 professionals work on the world's toughest challenges, spanning 150 countries with capital projects in the billions of dollars under management at any given time.

Our organization is committed to the pursuit of a better world through positive change. We are employee-owned and independent, which enables us to approach our business and client relationships with a long-term view. We deliver complex capital projects, optimize operations, and develop new technologies.

Based on the principles of our Manifesto and from founder, Gerry Hatch, we have built a strong reputation for conducting business with integrity. Modern slavery is a crime and a violation of fundamental human rights. We believe that to mitigate risk in relation to modern slavery, we have a responsibility to work with organizations in our supply chain to identify and eliminate risks of personal exploitation for personal or commercial gain.

Embracing our obligations under the Canadian Modern Slavery Act we assess potential suppliers and partners in accordance with our commitment to identify and eliminate risks of modern slavery. We strive to protect human rights and freedoms through ongoing due diligence. We are guided by our corporate policies and commitments, which can be found online at [**About Hatch.**](#)

Group Structure

Hatch Ltd. is 100% owned by Hatchcos Holdings Ltd., both of which are Canadian companies. The Hatch Group of Companies is 100% employee owned. The shareholdings of our employee shareholders is private and confidential information.



Supply Chain

We deal with supply chain issues in the following areas of our business:

- *Permanent and temporary or contract employees of Hatch providing professional services*

Hatch has a large global workforce which delivers professional services in the metals, energy, and infrastructure market sectors. The services we offer are in highly specialized areas with the result that our business is generally not exposed to risks of forced or child labour.

- *Subconsultants retained by Hatch to support our professional services*

Hatch delivers its professional services normally without subconsultants. From time to time, however, Hatch retains professional services from other consultants to assist us in delivering on our mandates.

- *Procurement that we perform as agents on behalf of our clients in Hatch's larger consulting professional services mandates to design and deliver facilities for our clients*

These larger professional services mandates relate to our detailed engineering and project support services as a procurement agent on large client projects in the metals, energy, and infrastructure market sectors.

- *Goods and services that support our overall global operations such as office leases, utilities, IT hardware and software, office equipment, marketing material, stationary supplies, catering and cleaning services, and personal safety, clothing, and equipment*

This category of procurement relates to goods and services needed for the operations of our offices in connection with the proper and professional delivery of engineering services.

Hatch procures computers, offices supplies, and professional services of third parties to assist us support our general operational needs as a large firm of consulting engineers.

Risks in Supply Chain

A. Permanent and temporary or contract employees of Hatch providing professional services

Because the professional services offered by Hatch are in highly specialized technical areas, our business generally is not exposed to risks of modern slavery. Our employees, design professionals, and corporate staff are employed on contracts with standard terms allowing the employee to terminate their employment on notice. All employees are paid at or above the relevant minimum wage in their jurisdiction.

Hatch has assessed the risks of modern slavery violation in the professional services area of our business as generally very low for two main reasons. First, our offices are in regions where the risk of modern slavery is low. As well, the type of services we provide are sophisticated and do not pose any risks for child or forced labour. Our professional services industry does not pose any significant relevant modern slavery risks.



B. Subconsultants to support the professional services Hatch provides

Like Hatch's own workforce, the workforce of our subconsultants are generally professional and office staff serving as permanent employees. Our subconsultants operate in the same engineering and consulting profession as Hatch. As well, they engage their staff on employment contracts similar to those offered to our staff.

These subconsultants also have their offices located in the same regions in which we work. The services our subconsultants provide are sophisticated, like ours, and their staff is either professional or semi-professional people with post secondary education and highly specialized training.

When professional recruiters assist us in hiring contract employees for large projects in foreign countries, we comply with local law. We allow our contractors to terminate contract on notice. All contract employees are paid at or above the relevant minimum wage in their jurisdiction and in accordance with applicable laws.

C. Procurement when executing Hatch's larger consulting mandates

On our larger implementation projects, we often are the procurement agent for our clients when they are purchasing equipment and bulk materials for the construction of their facilities. We believe the risk of modern slavery violations in this area of our business to be relatively small because of the type of procurement (specialized equipment) and our highly customized facilities we design.

On our large projects, our clients take ultimate responsibility for their supply chain choices. Some of our clients' projects are in jurisdictions where there are higher risks for modern slavery. We have identified tier 2 and tier 3 subcontractors and suppliers to be areas of potential risk. Where we are acting as Owner's Construction Manager at their projects, our Construction Management and Procurement groups initiate a pre-screening and selection process for both National and International construction contractor participation in construction of the project. This is followed by a rigorous contract tender, bid evaluation and construction contractor recommendation process prior to contract award. When construction contractors have mobilized, our Construction Management team implement industrial relations programs tailored to the project to provide ongoing monitoring of worker welfare issues and processes for their resolution. These programs offer open discussions on items such as compensation, travel, accommodation and hygiene, hours of work and worker fatigue as well as opportunities for workplace improvement. As a trusted procurement agent, we help clients implement best practices when advancing their modern slavery initiatives.

Most of our large clients have policies in place on modern slavery, sustainability, and other supply chain initiatives. We are often asked to ensure compliance with relevant legislation in connection with supply chains for our projects. As a consultant performing procurement services as agent, we aim to have a positive impact and influence when assisting clients as a consultant.

Hatch's procurement teams monitor the technical depth, capacity, and business practices of our main suppliers with most of whom we have well-established relationships. Hatch's list of suppliers is regularly purged and updated as we perform our ongoing monitoring and due diligence.

The list presently consists of approximately 2,000 active companies. Regular reviews of our supplier list encourages modern slavery best practices.



D. Goods and services that support our corporate operations

Hatch considers modern slavery risks in our day-to-day corporate and office operations as low. When procuring office leases, utilities, IT hardware and software, office equipment, marketing material, stationary supplies, catering and cleaning services, we deem ourselves exposed only to second and third tier supplier risks and mostly in remote jurisdictions only i.e., the subcontractors and unknown suppliers assisting our suppliers.

We consider the manufacturer of electronics and personal safety, clothing, and equipment for our personnel to be areas to monitor. To mitigate risks, we intend to pay more attention to suppliers and jurisdictions which are new to us. As well, we have retained a third-party service provider to monitor our suppliers and provide us regular status reports and alerts in relation to both new and existing suppliers contained in our global database.

Actions Taken

Our employees are expected to abide by our Code of Conduct, which helps to create a culture that fosters transparency. We strive to empower our people with the correct tools to avoid, identify, and respond to legal and ethics-related issues.

Suppliers, contractors, and business associates working under Hatch's direction are also expected to comply with our Code of Conduct. This Code applies to all contractors working for us in any capacity, including their employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representative, joint venture, and partners business partners.

Hatch is introducing a vendor self-assessment questionnaire which will address among other risks, modern slavery risks. For new and existing subconsultants and goods and services suppliers, Hatch will introduce the requirement that this self-assessment questionnaire be completed. Answers to the questionnaire will be reviewed as part of our due diligence process when assessing whether to conduct business with proposed suppliers.

As part of our onboarding process, Hatch intends to provide basic training to our procurement teams on modern slavery risks to enable our teams to improve their recommendations. Where Hatch is performing procurement services on behalf of our clients, we are often asked to use our clients' systems and processes for identifying modern slavery risks.

Hatch directors have overall responsibility for ensuring we comply with our legal and ethical obligations. Our employees are expected to understand and comply with our Code of Conduct. Employees are required to avoid any activity that might lead to, or even suggest, a breach of our Code of Conduct. Employees will be encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.



Risk Assessment

We are introducing steps to mitigate the risks of modern slavery by managing third parties through site visits, interviewing new entities within the supply chain, and questionnaires for suppliers to complete to better assess risks. We intend to implement best practices wherever we see a need for improvement.

We are monitoring risks in countries and jurisdictions that have yet to embrace modern slavery initiatives. When acting as a procurement agent, we will continue to consider compliance with modern slavery initiatives from the perspective of our clients and ourselves.

For new suppliers that Hatch directly engages, we will be introducing ongoing monitoring practices to better manage this risk and the potential of modern slavery risk.

Remediation

As of this time, we have not experienced any impacts in Hatch's supply chain and no forced/child labour has been identified within any of our suppliers. Hence, Hatch has not had to implement any remedial actions to manage known or actual modern slavery risks.

If we become aware that remediation measures are required to address the issues of forced/child labour, we will promptly take such steps as are necessary to protect victims and prevent recurrence.

Training

Training on the risk our business faces from modern slavery in its supply chains will form part of the onboarding process for all individuals engaged in procurement activities at Hatch. Our commitment to addressing the issue of modern slavery in our business and supply chains is to be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Effectiveness Assessment

At this stage, no Key Performance Indicators or other measures have been put into place to measure whether our policy is effective. Going forward, it is expected that at minimum we will review annually the number of employees trained and the number of suppliers made aware of modern slavery initiatives and remediation actions.



This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending September 30th, 2023. It has been issued on behalf of Hatch Ltd. and approved by the Board of Directors.

Signed and Dated May 7, 2025.

DocuSigned by:

John Bianchini

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GIOVANNI BIANCHINI, Director

I have the authority to bind Hatch Ltd.

Signed by:

[Signature]

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JOHANNES LOMBARD, Director

I have the authority to bind Hatch Ltd.

DocuSigned by:

Robert Francki

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ROBERT FRANCKI, Director

I have the authority to bind Hatch Ltd.

Signed by:

Michael Schatz

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MICHAEL SCHATZ, Director

I have the authority to bind Hatch Ltd.