



**Modern Slavery Statement
("Statement")
May 31, 2025**

INTRODUCTION

Hammerstone Infrastructure Materials Ltd. (the "**Company**" or "**Hammerstone**"), previously known as Hammerstone Corporation, was incorporated on November 26, 2008 under the jurisdiction of the *Business Corporations Act* (Alberta). The Company holds industrial mineral leases and permits in Northern Alberta in the oil sands region and is involved in processing limestone, sand and gravel to produce a variety of aggregate products for sale. The address of the Company's registered office and principal place of business is #360 999-8th Street S.W. Calgary, Alberta, T2R 1J5. The Company is a subsidiary of BURNCO Rock Products Ltd., a privately held company.

This Statement is made for the financial year ended December 31, 2024.

COMMITMENT

The Company is committed to supporting and enhancing the communities in which we operate. We continue to work to align our business practices with leading frameworks for responsible operation and are an active participant in industry forums and other organizations.

We are committed to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights, including but not limited to:

- operating with leading health and safety practices to support the goal of zero serious safety incidents;
- striving to ensure that the interests, safety and well-being of the communities in which we operate are integrated into our business decisions;
- the elimination of discrimination in employment;
- the prohibition of child and forced labour; and
- the eradication of harassment and physical or mental abuse in the workplace.

We recognize that the risks of modern slavery and human trafficking are complex and evolving, and we continue to work to address these in our business. Our approach and processes are periodically reviewed and, where appropriate, updated as necessary to reflect changes in circumstances and practice.

HOW THIS STATEMENT WAS PREPARED

The Company continues to manage the preparation of the modern slavery statement through a working group comprised of representatives of its Health and Safety Department and Executive team ("**Working Group**").

The Working Group coordinates the development and implementation of the Company's modern slavery approach and works to properly integrate this approach with the Company's core business activities, including contracts, due diligence processes, training and communications, as appropriate. The Working Group has developed this framework through collaborative consultation with relevant internal stakeholders and, where appropriate, external



advisors to verify that the operations and processes meet applicable legal requirements. Ongoing consultation takes place through various forums such as management meetings, board and committee meetings and periodic reviews associated with the risks of the Company.

This Statement was reviewed by members of the leadership team before being formally approved by the Board.

SUMMARY OF KEY ACTIVITIES IN 2024

The human rights and modern slavery risk assessment was updated.

Anti-Modern Slavery and Human Trafficking Policy training was provided to new hires and upon annual re-orientations.

ASSESSING MODERN SLAVERY RISK

Our approach to addressing modern slavery is designed to be commensurate with the risks we face, which vary based on several factors, including jurisdiction, industry and sector.

Risk assessments are important to the Company's efforts to promote the eradication of modern slavery. The risk-based approach enables the Company's to focus efforts where most required.

MODERN SLAVERY RISK PROFILE

1. Third-Party Vendors

Given the nature of our business and the geographic location in which we operate, third-party suppliers and vendors used generally fall under the below categories:

- (a) Equipment, Parts and Supplies
 - Includes procurement of equipment, parts and supplies from various vendors.
- (b) Property and Facilities Maintenance
 - Includes building repairs and maintenance, cleaning, utilities, and public services.
- (c) Professional Services
 - Includes consulting, legal, human resources, accounting, training, tax, audit, banking and education.
- (d) Vendor Software Providers
 - This includes off-the-shelf software, and IT services provided.
- (e) Transportation and Hotels
 - Travel, including accommodation, is generally booked through an approved travel management company.

The Company continuously strives to achieve excellence with respect to our contracting practices because we believe that adequately compensated and trained workers, operating in fair working conditions deliver high-quality products and services. We believe that the risk of modern slavery within the majority of our third-party vendors is low, this assessment is based



on the geographic location and industries in which they operate and the skill of the professionals providing such services. However, we acknowledge that, to a lesser extent, we engage with suppliers who may be considered higher risk in terms of modern slavery, which may include, suppliers of parts and supplies not manufactured in Canada. We recognize that each of our suppliers has its own supply chain, and our vendor assessments consider this risk where appropriate and possible. We currently have limited visibility of these extended supply chains, excluding projects where subcontractors or materials require our approval.

2. Employees

Our people drive our success. All employees of the Company are employed in Canada. The Company has human resources policies, procedures and processes in place designed to protect against modern slavery and human trafficking in the Company's employee population. These include:

- Employment conditions;
- Processes for reporting and resolving staff concerns and grievances;
- Non-discriminatory hiring practices;
- Employment screening (including work eligibility checks); and
- Appropriate workplace behavior.

Through our Positive Work Environment Policy, all employees are responsible for creating a respectful environment and are required to identify and report workplace discrimination, violence and harassment as it occurs. The Company's employees receive training on the Positive Work Environment Policy and are required to certify annually that they have read and complied with it.

Based on the above, we consider that there is a low risk of modern slavery within employee population of the Company.

MANAGEMENT OF MODERN SLAVERY RISKS

1. Governance

We recognize that strong governance is essential to sustainable business operations, and we aim to conduct our business according to the highest ethical and legal standards. Our approach to addressing modern slavery is designed to be commensurate with the risks we face, which vary based on several factors, including jurisdiction, industry and sector. Key supporting policies and guidelines (together, the "**Policy Framework**") include, but are not limited to:

(a) Anti-Forced Labour, Modern Slavery and Human Trafficking Policy

This policy aims to codify the Company's approach to minimizing the risk of modern slavery within the business and supply chain.

(b) Code of Business Conduct and Ethics

The Company's' Code outlines our commitment to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights. Employees are required to certify



annually that they have read and complied with the Code and the protocols incorporated therein. This policy includes

- Violation Reporting (Whistleblower Hotline) - the Company is committed to conducting business with honesty and integrity and staff are expected to maintain high standards. This sets out the expectations of reporting and responsibilities, and outlines whistleblowing procedures addressing how to raise a concern, confidentiality, as well as remediation, external disclosures and our zero tolerance for retaliation or malicious acts. The Hotline is managed by an independent third party and is accessible 24/7 by telephone or online.
- Facilitation payments – modern slavery and financial crime are closely linked, as proceeds from modern slavery and human trafficking need to be ‘cleaned’ before entering the mainstream economy. Therefore, preventing the onboarding of those involved in financial crime, identifying suspicious or criminal activity and making reports to the relevant authorities not only supports the fight against money laundering, but also the fight against modern slavery by association.
- Bribery – to prevent decisions from being influenced with promises, payments or gifts.

(c) Vendor Management Procedures

In connection with any vendor engagement, employees are required to comply with the Company’s policies and procedures, including those in relation to anti-modern slavery.

Our Vendor Code of Conduct (“**Vendor Code**”) sets out our expectations of vendors that provide goods or services to the Company’s and, where appropriate, vendor contracts should include acceptance of the Vendor Code or reference to equivalent vendor policies.

The Company’s approach to addressing high-risk, third-party vendors includes conducting enhanced due diligence checks, the use of specific contract clauses in legal agreements, requiring vendors to provide their modern slavery statement and evidence modern slavery mitigation strategies.

(d) Positive Work Environment Policy

This outlines our commitment to providing a workplace free of discrimination, violence and harassment and summarizes the responsibilities of employees to understand: (i) what constitutes workplace discrimination, violence and harassment; (ii) their obligations to maintain an environment where these behaviors are not tolerated; and (iii) how to report incidents following proper procedures.

Our Policy Framework is reviewed periodically and updated as necessary.

2. Training

All the Company’s employees receive modern slavery training as part of the onboarding process and access ongoing training, as necessary. Additional training relevant to applicable



regions and roles, particularly in higher-risk functions such as procurement, is provided.

3. Measure of Effectiveness

The Company acknowledges that modern slavery and human trafficking are possible risks within our operations and supply chain. The Working Group undertakes various steps to address these risks in our business, including reviewing our policies and business practices to ensure they reflect our commitment to:

- Implementing and enforcing effective systems and controls designed to reduce the risk of modern slavery in our business and supply chains; and
- Transparency through our disclosure obligations.

We monitor and assess the effectiveness of our modern slavery program through:

- Regular engagement and feedback from key stakeholders, including through active promotion of our reporting Hotline; and
- Operational risk and mitigation plan reporting to the relevant boards and senior executives.

4. Process of Consultation

The Company took a cross-functional approach to preparing and drafting this Statement. A consultation process was undertaken. The Board was given an opportunity to consider and provide comments to the Statement.

APPROVAL

This Statement has been prepared by the Working Group and has been approved by the Board of Directors on May 28, 2025, pursuant to section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. It has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada and is available on our website at

www.hammerstone.ca

Signed by:

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Thomas Zais, Director

May 28, 2025