# 2024 Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

#### Introduction

This report has been prepared by **1073469 BC Ltd.** 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 October 31, 2023.

## Organizational structure, activities, and supply chain

1073469 BC Ltd is incorporated under the laws of Canada and operates from a corporate office located in Hope, British Columbia. We own four subsidiaries that operate in the construction industry in British Columbia, including the design, installation, building and maintenance of civil construction projects, and the importation and sale of parts and components to support construction-related activities.

1073469 BC Ltd does not have employees. We lease and rent equipment to our subsidiaries, and as a result, our supply chain is closely aligned with the location of our subsidiaries' operations in British Columbia. For the financial year ending October 31, 2023, we procured a minimal volume of products to support our leasing services, including construction machinery and related parts and components. We did not import any products from foreign jurisdictions.

Our subsidiaries procure a range of goods to support their construction-related activities. Each of our subsidiaries have independent management teams who are responsible for making decisions on the procurement of goods. To our knowledge, procurement decisions made by our subsidiaries are based on the reliability and reputation of the supplier, and our subsidiaries have long-term, ongoing and repeat relationships with the majority of their suppliers.

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

1073469 BC Ltd. has integrated responsible business practices in our business activities by adopting a strong commitment to our communities, which includes focusing on community sustainability, security and environment. To date, we have not received any complaints relating to forced labour or child labour in our operations or supply chain.

Our subsidiaries prevent and reduce the risk of forced labour and child labour in their activities by focusing primarily on monitoring the safety of workers on work sites and requiring their subcontractors and suppliers to comply with applicable laws relating to employment, human rights and safety.

Steps taken by our subsidiaries to prevent and reduce the risks of forced labour or child labour in the operations and supply chain include training workers with knowledge and skills benchmarked to current industry standards relating to health, security, safety and environment, maintaining high standard of workplace security, requiring suppliers and contractors to follow the human rights laws and our safety

programs, and using existing grievance mechanisms to ensure concerns relating to violations of labour rights are adequately addressed.

## Policies and due diligence processes

1073469 BC Ltd.'s risk management process focuses on assessing the working conditions and safety of workers in our leasing activities and subsidiaries' operations and engaging with suppliers to ensure compliance with applicable employment, human rights and safety protections for workers.

Our directors are responsible for managing risks associated with human rights in our operations and business activities and meet regularly with the senior management teams in our subsidiaries to consider any risks to workers that are associated with our business activities.

Our subsidiaries have implemented programs specifically addressing project health and safety and young workers, to uphold our commitment to safe working conditions and set the expectation that each site will assess and mitigate risks to workers. Our subsidiaries have also established policies and programs requiring managers, workers and contractors to uphold high moral and ethical principles, and specifying the norms of behaviour for those who conduct business activities on our behalf. These policies and programs demonstrate zero tolerance for any form of abuse or human rights violations to workers.

#### Forced labour and child labour risk

1073469 BC Ltd. acknowledges that the global construction industry carries risks of forced labour and child labour, particularly when subcontractors are not accountable for the ethical and safe treatment of workers.

1073469 BC Ltd. does not actively engage in construction activities and does not have employees; as such, the risk of forced labour and child labour in our operations is low. Our subsidiaries operate exclusively in Canada and conduct business with long-term reputable suppliers. For this reason, we have also identified the risk of forced labour and child labour in our subsidiaries' operations to be low. We do, however, recognize the ongoing requirement to learn and increase visibility over the risks of forced labour and child labour in the construction industry.

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

To date, 1073469 BC Ltd. has 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**

1073469 BC Ltd. and our subsidiaries prioritize health and safety for our workers, contractors, suppliers and other members in the community that is affected by our projects. We are committed to educating workers on our compliance standards and identifying hazards and indicators of unsafe working conditions. All employees and contractors undertake a range of onboarding training and ongoing education, delivered online and on-the-job. This is designed to share information and build knowledge on how to comply with our standards, the expected standards of conduct when interacting with others, and the avenues for raising and resolving issues and complaints.

# **Assessing effectiveness**

1073469 BC Ltd. monitors our subsidiaries to ensure compliance of the workers, contractors and suppliers with the standards benchmarked to the industry. Beyond our safety assessments, to date, we have not adopted any specific assessment mechanisms to assess measure and track the effectiveness of steps taken to prevent or reduce the risks of forced labour or child labour.

# **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 entity or 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 Hope, British Columbia, this 27th day of May, 2024.

Raymond Dent - President

I have the authority to bind 1073469 BC Ltd..