

Superheat 2023 Forced Labour in Canadian Supply Chains Report

This report represents the first annual submission for compliance reporting pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act).


This constitutes a report to the Minister on the steps taken during the first reporting year ending September 30, 2023. As this is an initial report, efforts were made to better understand the reporting requirements and start the process of developing a framework and action plan for the following years.

Consistent with this legislation and our commitment to ethical sourcing, our principal suppliers of the components necessary to manufacture our proprietary heat treatment machines, which are used in our heat treatment service, they have been vetted using their existing supply change attestations that can be found on their website.

The below commitment regarding Modern Slavery and Forced Child Labour is by reference a part of this report.

For the current reporting period, Superheat has not become aware of any instances of forced or child labour in our operations or of our suppliers, and remediation has not been required.

In accordance with the new requirements of the Act, and in Particular section 11 therefore, I attest that I have reviewed the information contained in the report for 1797509 Alberta ULC and its Superheat subsidiaries. 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 2023.



Sundip Bajaj

Chief Financial Officer, COO and President

May 28, 2024

I have approval to bind the entity.

Superheat Commitment to Ethical Sourcing

An Anti-Modern Slavery and Forced Child Labour Statement

Our Business

1797509 Alberta ULC and its subsidiaries (together referred to as Superheat) are a privately-owned Canadian business that provides heat treatment services using proprietary remote monitoring technology. Superheat began in 2000 and was founded on the principle that innovation and technology advancements can produce a safer, more cost-effective, and quality driven way to provide on-site pre and post weld heat treatment service. We are proudly Canadian company with ethical employment practices including compliance with all local, provincial, and federal health and safety, environmental, human rights, labour and employment laws and regulations. We do not practice forced or child labour and we strictly condemn and prohibit any form of forced, child or illegal labour or slavery from our partner and vendor supply chains.

Supply Chain and Due Diligence

Our principal suppliers, provide the components necessary for us to manufacture our proprietary heat treatment machines and accessories. These are all manufacturers and distributors with established compliance mechanisms and strong reputations in their industry. Our procurement review mandates that our major suppliers provide us with copies of their Human Rights Policy and/or Anti-Slavery statements. As our supply chain carries the only risk of forced labour and child labour. Superheat expects our suppliers on an ongoing basis to establish compliance with all local, provincial, and federal health, safety, environmental, human rights, labour and employment laws and regulations including all applicable laws regarding human trafficking, forced labour, child labour or other forms of modern slavery across supply chains.

Code of Conduct

Superheat is committed to acting ethically and with integrity and transparency in our business dealings. We also recognize the importance of maintaining a working environment that provides for the safety, health and environment of our employees, clients, and community. In achieving this endeavor, Superheat policies reflect our commitment to safety, health and the environment through our employee training and awareness programs. It is our intent to be the leader among contractors.

We encourage open dialogue between all team members in sharing ideas and experiences in keeping with a common goal: zero accidents, good health and no incidents that will adversely affect the environment around us. All employees are expected to abide by all applicable regulations, laws, and safe work practices in addition to any other procedures which may be required by our clients, therefore ensuring a safer, environmentally sound workplace for all involved.

Although we have no formal training specific to modern slavery and/or forced labour, all employees are empowered to report any concerns with respect to potential violations of our equal employment opportunity policy, disability duty to accommodate policy or any other discrimination. Any concerns may be report via their local managers, safety personnel, human resource department or any corporate managers. Any violations of our policies would be investigated by our human resources department. We provide a confidential email address, and lockbox to report any violations or abuse to the head of our HR department.

If any potential abuse were to be reported with respect to forced or child labour in our supply chain, Superheat will take serious and immediate action with the applicable supplier. We will make efforts to remediate non-compliance and if the supplier fails to promptly address the situation, the relationship with that supplier will be terminated.

Monitoring

An annual review will be conducted with input from Key stakeholders to make the necessary updates based on new and evolving information resulting from ongoing updates and supply chain scrutiny.