

## Modern Slavery Statement for the Financial Year Ended 2023

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. It outlines our approach and initiatives to identify and address the risks of forced labor and child labor in our business operations and supply chains during the financial year commencing January 1, 2023 and ending December 31, 2023.

This will be a joint report for 3929711 Manitoba Ltd., which owns the shares for Wallace and Wallace Fences Ltd., Midwest Fence Company Ltd. and Shorty's Fencing 2007 Ltd.

### Companies Overview

- **Company Name:** 3929711 Manitoba Ltd.
- **Business Structure:** Corporation
- **CRA Business #:** 877554824
- **Head Office Location:** Winnipeg, MB, Canada

3929711 Manitoba Ltd. Owns shares for Wallace and Wallace Fences, Midwest Fence Company and Shorty's Fencing 2007.

- **Company Name:** Wallace and Wallace Fences Ltd.
- **Business Structure:** Corporation
- **CRA Business #:** 898943485
- **Head Office Location:** Winnipeg, MB, Canada

Wallace and Wallace is a manufacturer, distributor and installer of residential, specialty and industrial/commercial fencing. We also manufacture and distribute automated gates and distribute garage doors.

- **Company Name:** Midwest Fence Company Ltd.
- **Business Structure:** Corporation
- **CRA Business #:** 713512325
- **Head Office Location:** Winnipeg, MB, Canada

Midwest Fence Company is a leading provider of fencing solutions and services in the Midwest region. With a strong commitment to quality, durability, and customer satisfaction, we have been serving residential, commercial, and industrial clients since our inception. Our extensive experience and expertise in the fencing industry have

enabled us to establish ourselves as a trusted name for all fencing needs. Some of the services that we offer are: Residential Fencing, Commercial Fencing, Industrial Fencing, Fence Repair and Maintenance, and Custom Designs.

- **Company Name:** Shorty's Fencing 2007 Ltd
- **Business Structure:** Corporation
- **CRA Business #:** 858694995
- **Head Office Location:** Winnipeg, MB, Canada

Shorty's Fencing specializes in residential fences. By offering a carefully selected range of fence packages and simple options that don't complicate the installation process, the crews are among the most efficient in the business.

## **Supply Chain Overview**

**General Description:** Our company primarily purchases wire to manufacture chain link fences, pipe and tubing, and overhead doors. We source materials from several suppliers located around the globe, with a focus on the United States, Europe, and Asia. Our supply chain is robust and diversified, relying heavily on Asian suppliers for wire, while also integrating materials from the US and Europe to maintain a steady and reliable flow of resources for our manufacturing processes.

**Risk Areas in Supply Chain:** Despite the lower inherent risk in the steel industry compared to sectors like textiles, we recognize the importance of identifying and mitigating any potential risks. We evaluate the countries and regions from which we source wire, pipe, and tubing. For a lot of our suppliers, we have met directly with ownership or key management and in some cases visited their production facilities.

## **Actions Taken**

**Position Statements:** Our company is deeply committed to respecting human rights and ensuring ethical practices throughout our business operations and supply chain. We recognize that our supply chain plays a critical role in upholding human rights.

**Supplier Agreements:** We are working in developing a supplier code of conduct that explicitly outlines our expectations regarding human rights, labor practices, and ethical behaviour (still not in place). In the meantime, we started verbal conversations with customers and suppliers regarding labor practices, ethical behaviour, and risk management.

**Employee Education:** We are looking into specific training that could help our employees understand more about supply chain risks and onboarding procedures for new suppliers.

## **Risk Assessment**

It is our intention to develop and implement policies to mitigate risks related to forced labour and child labor in their supply chains:

1. Supplier code of conduct: We want to develop a supplier code of conduct that explicitly prohibits forced labour and child labour. Suppliers will have to adhere to these standards as a condition of doing business with the company. We will include provisions for monitoring these expectations.
2. Supplier questionnaires: We will implement a supplier questionnaire with questions regarding child and forced labour.

## **Remediation**

If forced/child labour is identified within our company, one of the remediation measures that we will be implementing is termination of contracts with suppliers involved in such practices.

Protecting the victim of slavery must be the first priority of the remediation program. Once an allegation of modern slavery is made, the company will do everything they can to take the victim to a place of safety with appropriate security, and provide with reassurances and welfare. The company will provide access to relevant government or third party remediation services such as the police or other recognized remediation authority within the relevant country.

## **Training**

Once finalized, all employees will have to sign on the new policy related to supply chain risk management and mitigation.

We will create training sessions where we will provide detailed information about the policy, highlighting specific risks that employees should be aware of. We will train employees to identify potential risks within the supply chain, and discuss common risk factors (geopolitical instability, natural disasters, supplier financial health).

Regarding remediations strategies, we will focus on teaching employees how to address identified risks and provide examples of remediation actions (diversifying suppliers, creating contingency plans).

We will conduct regular seminars or workshops to reinforce policies, and will annually review policies and update employees of any changes.

### **Effectiveness Assessment**

No actions have been taken yet to assess the effectiveness in preventing and reducing risks of forced labour and child labour in our activities and supply chains.

### **Sign Off**

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.

Marcus Matychuk  
Full Name

Chief Financial Officer  
Title

  
Signature

May 31, 2024  
Date

"I have the authority to bind "3929711 Manitoba Ltd., Shorty's Fencing 2007 Ltd, Wallace and Wallace Fences Ltd and Midwest Fence Company Ltd".