

## **Forced Labour And Child Labour Report**

### **Introduction**

This Forced Labour and Child Labour Report (this “**Report**”) is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), also known as the Modern Slavery Act (the “**Act**”).

This Report is a joint report which applies to, and describes the steps taken by, the following reporting entities to mitigate forced labour and child labour in our organization’s operations and supply chains:

<b><u>Reporting Entity</u></b>	<b><u>Abbreviation</u></b>
ABC Canada Technology Group Ltd.	ABC Canada
C&J Quarterback Holdings Ltd.	C&J

ABC Canada’s reporting period under this Report is the financial year ending September 30, 2023. C&J’s reporting period under this Report is the financial year ending December 31, 2023.

In this Report, ABC Canada and C&J are hereinafter referred to collectively as the “ABC Canada Group” or “**we**”, “**us**” or “**our**” except where the context otherwise requires.

### **Respect for Human Rights**

The ABC Canada Group fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour in our operations and our supply chain. Respect for human rights is fundamental to our values, the long-term stability and growth of our business and to the wellbeing of the communities in which we operate.

As set out in the United Nations Guiding Principles on Business and Human Rights (“**UNGPs**”), business enterprises have a responsibility to respect internationally recognized human rights. The responsibility to respect human rights requires that business enterprises: (a) avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; and (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

The ABC Canada Group has a risk based due diligence approach on forced labour and child labour. The Act came into force on January 1, 2024, while as of the end of the last fiscal year the ABC Canada Group had not taken any material steps to identify and assess the risk of forced labour and child labour, following a risk-based approach, we are committed to continuous improvement in our policies and processes.

## **Corporate Structure, Activities and Supply Chains [Section 11(3)(a) of the Act]**

### **Corporate Structure**

ABC Canada is incorporated under the *Canada Business Corporations Act*. C&J is incorporated under *The Business Corporations Act, 2021* (Saskatchewan).

ABC Canada has other subsidiaries however those subsidiaries are not reporting entities under the Act.

ABC Canada is controlled by C&J Quarterback Holdings Ltd.

### **Activities**

C&J is not involved in the production, selling or distribution of goods but they collectively control ABC Canada which distributes goods.

ABC Canada is a vertically-integrated manufacturer of flexible and semi-rigid polymer products and air distribution systems for mine ventilation with manufacturing operations in two provinces. ABC Canada is also a manufacturer of flexible ducting for environmental and temperature control. ABC Canada's products are utilized in mining, construction, special event, utility, marine, military, oil & gas and aviation applications. ABC Canada's systems are designed in the ventilation of underground mining, as well as commercial and industrial construction activities, ABC Canada utilizes the ISO 9001 quality assurance program. ABC Canada was established in 1968, and is headquartered in Saskatoon, Saskatchewan.

As of January 2024, ABC Canada employs more than 160 people in Canada. ABC Canada has no employees outside of Canada. C&J has no employees in Canada other than its directors and officers and has no employees outside of Canada.

ABC Canada's employee salaries are reviewed regularly, including against the Consumer Price Index (CPI) in Canada to determine cost of living increases. ABC Canada has established compensation policies, including compensation grids, which are reviewed regularly. Permanent and full-time employees of ABC Canada are eligible for employer-paid benefits which includes a component for life insurance, accidental death and dismemberment, medical, dental, extended health and an employee and family assistance program. ABC Canada also has a defined contribution pension plan for employees who are eligible.

ABC Canada has established organization guidelines and operating practices which govern operations including the hours of operation, employee job descriptions and salary ranges, and safety policies and procedures for employee protection.

## Supply Chain and Operations

We acknowledge the risk of forced labour and child labour existing in any complex supply chain, particularly where ABC Canada has no direct contact with the suppliers when goods are purchased through distributors. ABC Canada has limited information available to it regarding the operations of those suppliers.

For goods ABC Canada purchases directly, ABC Canada currently does not have any policies or practices in place to determine whether forced labour or child labour is used at any step of the production of those goods in Canada or elsewhere or of those goods imported into Canada. For its suppliers located in countries other than Canada, ABC Canada does not require those suppliers to provide any information on their operations. We acknowledge the risk of forced labour and child labour that may exist when importing goods from other countries. ABC Canada is not disclosing what other countries it imports goods from since that information is commercially sensitive information.

### **Goods and Services Procured Directly by ABC Canada**

The ABC Canada Group procures various services and goods (other than goods which are incorporated into goods ABC Canada manufactures or produces) to support our operations. Our specific supply chain profile remains largely the same year-on-year. The types of goods (other than goods which are incorporated into goods ABC Canada manufactures or produces) and services procured by ABC Canada from its suppliers consist of:

- Office equipment and supplies/consumables/marketing materials
- Technology and IT
- Transport and accommodation.
- Facilities management
  - o Janitorial services
  - o Cleaning, sanitation, and personal property equipment and products
- Parts and Equipment
  - o operational equipment, including forklifts.

We also provide a general description of the key forced labour and child labour risks that are likely to exist in each of those categories by virtue of the industry risk profiles and provision of goods or services.

<b>Type of goods / service</b>	<b>Description</b>	<b>Generally known forced labour and child labour risks</b>
Office equipment and supplies / consumables / marketing	Food products and catering services, cleaning products, office furniture, printing, stationery, merchandise suppliers	Food Services - Food related supply chains have a high risk of forced labour and child labour due to the reliance on ingredients sourced globally, often from countries with a higher prevalence of, and vulnerability to forced labour and child labour. For example, coffee, tea, cocoa, rice, palm and derivative

		<p>products and seafood are some of the many products linked to forced labour and child labour.</p> <p>Corporate Merchandise - Mass-produced items and garments, particularly if produced in countries with a greater prevalence of, and vulnerability to and have a higher risk of child labour and forced labour.</p> <p>Furniture - There are increased forced labour and child labour risks associated with producing and sourcing raw materials such as timber, bricks, PVC in flooring, fabrics, metals and glass as well as risks in the manufacturing industry located in countries with a greater prevalence of, and vulnerability to, forced labour and child labour.</p>
Technology and IT	Electronics, tablets, laptops, desktops, mobile phones	Forced labour and the worst forms of child labour are present in the supply chains that provide IT companies with the necessary raw materials to produce electronic goods, and parts of those goods. The manufacture of electronics has been associated with labour exploitation, including child labour and forced labour.
Transport and accommodation	Airlines, hotels and lodging	The hospitality and food services industry, irrespective of jurisdiction, has elevated risks driven by parallel factors described below in relation to the cleaning sector.
Facilities management	Cleaning and janitorial services	<p>The cleaning industry is considered a higher risk industry for forced labour and debt bondage due to factors such as employers withholding wages, excessive working hours, complex and opaque subcontracting arrangements, and workers on temporary visas with limited bargaining power and awareness of their rights at work.</p> <p>Similar to the cleaning sector, the prevalence of subcontracting in the</p>

		facilities maintenance industry can lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed due to a lack of transparency.
Parts and Equipment	Forklifts, operational equipment and flatteners, compacting machines, trailers and transport vehicles	The manufacturing of heavy equipment, if produced with components sourced from countries with a greater prevalence of, and vulnerability to, forced labour and child labour increases the risks associated with forced labour and child labour being used in the supply chains for these products.

Our suppliers are primarily domiciled in Canada, and we are of the view that our supply chains and activities for the types of goods (other than goods which are incorporated into goods ABC Canada manufactures or produces) and services procured by ABC Canada carry a low risk of the use of child labour and forced labour.

**Steps taken during last financial year to prevent and reduce risk that forced labour and child labour used in supply chain [Section 11(1) of the Act]**

Other than monitoring suppliers (as described below), obtaining confirmation from new employees regarding their age and having in place an Employee Handbook, the ABC Canada Group did not take steps during the last financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere for goods distributed by ABC Canada or of goods imported into Canada by ABC Canada.

**Policies and Due Diligence Processes in relation to forced labour and child labour [Section 11(3)(b) of the Act]**

ABC Canada has certain internal policies and processes in place to promote and ensure compliance with applicable laws (including in respect of employment and human rights) in Canada where ABC Canada has operations. These policies include an Employee Handbook. The Employee Handbook is a summary of policies, procedures and practices related to human resource management at ABC Canada. The Employee Handbook does not currently specifically reference child labour and forced labour.

During the hiring process for prospective candidates, ABC Canada asks that employees provide their age to us. Any overtime hours worked must be voluntarily and mutually agreed to by the employee and their manager. Any work outside of usual hours, such as in the evening, overnight or weekend, are paid in accordance with the applicable report-to-duty rates. All employees are paid their wages via an electronic transaction and receive a pay slip.

ABC Canada has assessed our operational risk for our own employees of child labour and forced labour as low.

### **Risk Assessment and Management [Section 11(3)(c) of the Act]**

As of the end of the last financial year the ABC Canada Group had not completed its assessment and identification of which parts of its supply chain which may carry a risk of forced labour or child labour.

### **Forced Labour and Child Labour Remediation Measures [Section 11(3)(d) of the Act]**

The ABC Canada Group is not currently aware of any forced labour or child labour practices occurring within its supply chain or in its activities. Accordingly, the ABC Canada Group has not undertaken any measures to remediate any forced labour or child labour to date.

### **Loss of Income - Remediation Measures [Section 11(3)(e) of the Act]**

The ABC Canada Group is not currently aware of any forced labour or child labour practices occurring within its supply chain. Accordingly, the ABC Canada Group has not undertaken any measures to remediate any loss of income relating to any forced labour or child labour to date.

### **Training [Section 11(3)(f) of the Act]**

The ABC Canada Group currently does not provide formal training to its employees on forced labour and child labour.

### **Assessing Effectiveness [Section 11(3)(g) of the Act]**

The ABC Canada Group currently does not have any policies or practices in place to measure and track the ABC Canada Group's success in preventing and reducing risks of forced labour and child labour in its activities and supply chains.

### **Approval and Attestation - ABC Canada Technology Group Ltd.**

This Report has been approved by the President and CEO of ABC Canada Technology Group Ltd. and is being provided as a joint report in respect of C&J Quarterback Holdings Ltd. for the reporting year January 1, 2023 to December 31, 2023 and in respect of ABC Canada Technology Group Ltd. for the reporting year October 1, 2022 to September 30, 2023 pursuant to Section 11(4)(b)(i) of the Act. This Report was approved by the Board of Directors of ABC Canada Technology Group Ltd. on May 31, 2024.

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 ABC Canada Technology Group Ltd. 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.

I have authority to bind ABC Canada Technology Group Ltd.

Signature: 

Name: James Damski

Title: Director

Dated: May 31, 2024

**Approval and Attestation – C&J Quarterback Holdings Ltd.**

This Report has been approved by the President and CEO of C&J Quarterback Holdings Ltd. and is being provided as a joint report in respect of C&J Quarterback Holdings Ltd. for the reporting year January 1, 2023 to December 31, 2023 and in respect of ABC Canada Technology Group Ltd. for the reporting year October 1, 2022 to September 30, 2023 pursuant to Section 11(4)(b)(i) of the Act. This Report was approved by the Board of Directors of C&J Quarterback Holdings Ltd. on May 31, 2024.

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 C&J Quarterback Holdings Ltd. 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.

I have authority to bind C&J Quarterback Holdings Ltd.

Signature: 

Name: James Damski

Title: Director

Dated: May 31, 2024