



Apex Industries Inc.

100 Millennium Blvd.
Moncton, NB
Canada E1E 2G8

Tel: 506-857-1600
Fax: 506-857-1639

Entity: Apex Industries Inc.

Reporting Period: Financial Year Ending December 31, 2023

Original Report

Business Number : 891318487

No reporting obligations in other jurisdictions

1. Steps Taken to Prevent and Reduce the Risk of Forced Labor and Child Labor:

Apex Industries Inc. has implemented several measures during the financial year 2023 to prevent and reduce the risk of forced labor and child labor in its operations and supply chains. These measures include:

- Conducting thorough assessments of all large suppliers, with particular focus on those operating in higher-risk countries.
- Engaging in follow-up discussions with suppliers identified as presenting higher risks.
- Implementing due diligence processes to ensure compliance with anti-forced labor and child labor policies.
- Maintaining regular communication with suppliers to monitor adherence to ethical labor practices.
- In process of developing training to employees involved in the purchasing process on identifying and addressing forced labor and child labor issues.

2. Structure, Activities, and Supply Chains:

Apex Industries Inc. is a manufacturer of steel products, including steel doors and frames, aerospace parts and assemblies, defense equipment, oil and gas components, and custom machinery. The company also engages in the distribution, installation, and servicing of architectural door hardware, wood doors, and overhead and garage doors. All of Apex's employees are located in Atlantic Canada in the Provinces of New Brunswick, Nova Scotia and Newfoundland.

Apex's buys products from independent distributors. The majority of our large distributors provide Apex with steel and architectural door hardware. Direct purchases from manufacturing and or processing companies are made from overhead and garage door, wood door and aerospace secondary processors.

3. Policies and Due Diligence Processes:





Apex Industries Inc.

100 Millennium Blvd.
Moncton NB
Canada E1E 2G8

Tel: 506-857-1600
Fax: 506-857-1639

The entity has established comprehensive policies and due diligence processes in relation to forced labor and child labor. These policies include a zero-tolerance approach to forced labor and child labor in all aspects of our Canadian business operations. Apex follows all labor and work safety laws within the provinces we operate in. Apex's employee handbook, that all employees have access to, outline Apex's commitment to an equitable and safe work environment.

There is a risk that our suppliers may provide product's that were manufactured with forced or child labor. In order to minimize this risk Apex has conducted supplier assessments.

4. Risk Assessment and Management:

Large suppliers and suppliers who may supply product from high risk regions or industries were identified. Apex then followed up with these companies to identify their compliance with forced labor and child labor legislation. Companies provided either their forced labor report or equivalent Environmental, Social and Governance (ESG) report that included their policies on employment and supplier standards. Apex had discussions with suppliers that are not required to prepare a Forced labor and Child Labor report to assess their compliance with the legislation.

5. Measures Taken to Remediate Forced Labor or Child Labor:

No instances of forced labor or child labor have been identified within Apex's own operations or supply chains of Apex Industries Inc. As a result, no specific remediation measures have been necessary.

6. Measures to Remediate Loss of Income to Vulnerable Families:

Apex Industries Inc. recognizes the potential impact of eliminating the use of forced labor or child labor on vulnerable families. However, as there have been no instances of forced labor or child labor within the company's operations or supply chains, no measures to remediate loss of income to vulnerable families have been required.

7. Training Provided to Employees:

All employees of Apex Industries Inc., upon being hired have been provided instruction on Apex's employee handbook specifically the sections on employee rights and complaint procedures. The outline of the handbook is posted within our buildings and accessible to all employees at all times.

Training materials in relation to the legislation is in the process of being prepared. Training sessions will be held during 2024 for senior management and employees involved in the purchasing process.

8. Assessment of Effectiveness:





Apex Industries Inc.

100 Millennium Blvd.
Moncton, NB
Canada E1E 2G8

Tel: 506-857-1600
Fax: 506-857-1639

The effectiveness of Apex Industries Inc.'s efforts in ensuring that forced labor and child labor are not being used in its business and supply chains is regularly assessed through internal audits, supplier evaluations, and feedback mechanisms. Continuous improvement initiatives are implemented based on these assessments.

This report is submitted in accordance with the requirements outlined by the Minister of Public Safety, effective January 1, 2024. Apex Industries Inc. remains committed to upholding the highest standards of ethical conduct and ensuring the integrity of its operations and supply chains.

Signed by

Keith Parlee
CEO
Apex Industries Inc.

May 29, 2024

