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## Compliance Report: Fighting Against Forced Labour and Child Labour in Supply Chains Act

**Date:** May 16, 2024

**Prepared for:** Minister of Public Safety

**Prepared by:** Greg Dickie, President of Atlantic All-Weather Windows Ltd

### Introduction

This initial report is prepared by Atlantic All-Weather Windows Ltd. for the Fiscal Year ending Jan 31, 2024, in compliance with the requirements of Canadian Bill S-211, also known as the Fighting Against Forced Labour and Child Labour in Supply Chains Act. The purpose of this report is to outline the measures taken by the company to combat forced labour and child labour within its supply chains.

### Structure, Activities and Supply Chains

Headquartered in Port Elgin, New Brunswick, Atlantic All-Weather Windows Ltd. is a manufacturer of windows and entrance systems, with operations and employees only in Canada. Being a Canadian-controlled private corporation (CCPC), the company is incorporated in the province of New Brunswick under business number 100323252 and is considered an entity as defined by the Act.

Atlantic All-Weather Windows Ltd. strives to use North American based suppliers and/or distributors for all components used in our products and any finished goods intended for resale. Some of these suppliers and/or distributors may source components or finished products from outside of North America, which in turn may be supplied to our company. Atlantic All-Weather Windows Ltd. does not directly import finished goods outside of Canada for direct sale to consumers.

### Policy Statement and Due Diligence

Atlantic All-Weather Windows Ltd acknowledges its responsibility to uphold human rights standards and ensure that forced labour and child labour are prohibited within its supply chain. The company is committed to ethical sourcing practices and maintaining transparency throughout its supply chain processes.

To mitigate the risk of forced labour and child labour, the following due diligence procedures have been implemented:

*Supplier Code of Conduct:* Atlantic All-Weather Windows Ltd has established a Supplier Code of Conduct that outlines our expectations regarding labour standards, including prohibitions against forced labour and child labour. Suppliers are required submit a Declaration of



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Compliance affirming adherence to these standards as a condition of doing business with the company.

*Supply Chain Transparency:* Atlantic All-Weather Windows Ltd maintains transparency within its supply chains by mapping out the various tiers of suppliers and subcontractors involved in the production process. This enables the identification of potential risks and take appropriate action to address them. A list of current suppliers is available at [www.atlanticwindows.com](http://www.atlanticwindows.com).

## **Risk Mitigation**

To identify potential risks of forced labour and child labour within its supply chains, Atlantic All-Weather Windows Ltd references the [World Vision Canada's Top Risky Goods by Import Value](#) and the [Bureau of International Labor Affairs \(ILAB\) List of Countries At Risk to Use Child Labour or Forced Labour](#) to evaluate the potential risk relative to the geographical regions, suppliers, and subcontractors involved in the production and distribution of their products.

## **Remediation and Accountability**

In case an instance of forced labour or child labour are identified within its supply chains, Atlantic All-Weather Windows Ltd is committed to taking swift and decisive action, committing to work its partners on remediation measures, which may include termination of contracts with non-compliant suppliers, providing support to affected workers, and implementing corrective actions to prevent future occurrences.

Atlantic All-Weather Windows Ltd is dedicated to transparency and accountability in our efforts to combat forced labour and child labour. An annual report will provide progress on implementation and enforcement of the anti-forced labour and child labour policies, including any challenges encountered and steps taken to address them.

## **Training**

With respect to continuous improvement, Atlantic All-Weather Windows Ltd established a committee to learn about the Act and how to apply the requirements in practice, making suppliers and other partners aware of the importance of the Act, and their responsibilities as part of its supply chains.

## **Assessing Effectiveness**

The target by the end of Fiscal 2025 is to ensure all partners are aware of the Act and each supplier submits a signed Declaration of Compliance (or similar) affirming adherence to these standards. Beyond this, no actions have been taken to assess the effectiveness in preventing and reducing risks of forced labour and child labour in the activities and supply chains.



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### Conclusion

In accordance with the requirements of Canadian Bill S-211, Atlantic All-Weather Windows Ltd is committed to upholding the highest standards of ethical sourcing and labour practices within its supply chains. By implementing robust due diligence procedures, fostering transparency, and holding itself and its suppliers accountable, aiming to prohibit forced labour and child labour from its operations and contribute to a more sustainable and ethical global supply chain.

Please feel free to reach out if you require any further information or clarification regarding Atlantic All-Weather Windows Ltd.'s compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Sincerely,

Greg Dickie, P.Eng | President  
Atlantic All-Weather Windows Ltd