

2023 Report under Fighting Against Forced Labor and Child Labor in Supply Chains Act

1. Introduction

This document constitutes the Annual Report pursuant to section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* and is filed on behalf of Bay Industries Inc. for the financial year ended December 31, 2023.

Conducting business with integrity is a fundamental principle within our organization. The report provides an overview of the actions that Bay Industries Inc. has taken and plans to take to assess and address risks of modern slavery, which includes forced labor and child labor.

Forced labor and child labor, each as defined in the Act, are crimes and serious violations of human rights. Bay Industries Inc. recognizes the key role that we have in adhering to the highest ethical standards in our operations and supply chains that support these.

2. Our Structure, Operations, and Supply Chains

Bay Industries Inc. consists of manufacturing and wholesale distribution locations throughout the United States of America and sales throughout North America. We produce and distribute insulation for pre-engineered metal buildings along with commercial industrial insulation, air handling and HVAC products.

As a company, we are committed to complying with all applicable laws and regulations everywhere that we do business and are committed to preventing the use of child and forced labor. Our suppliers are reputable suppliers that manufacture products within the United States of America, and we will work with them to implement our Supplier Code of Conduct in 2024.

3. Policies, due diligence, and controls

Bay Industries Inc. will not condone or engage in the unlawful employment or exploitation of children or forced labor in the workplace. We adhere to all provincial, state, federal and local laws concerning the lawful employment of children and others. The use of forced labor or child labor where any work or service that a worker performs involuntarily under threat, violence, or penalty is prohibited.

We adhere to all federal, state, and local legislation and laws concerning the minimum age and working conditions of all our employees. We will seek to create a policy to enforce the principles of the Act to become a requirement for our suppliers to adhere to as well.

4. Risk Assessment Methodology and Results of Assessment

In 2024, Bay Industries Inc. will implement a supplier code of conduct to distribute to our supply chain. Today all raw materials or resale materials are purchased from reputable US companies. We will continually review our policies to reduce any potential act of modern slavery.

5. Risks of forced labor and child labor in our operations and supply chains

Bay Industries Inc. is not aware of any forced labor and child labor going on in our activities or our current supply chain.

6. Remedial Action Taken during 2023

Bay Industries Inc. has not identified instances of forced or child labor in its activities or supply chains. As such, no remediation measures have been taken. We will continue to assess our activities and supply chains and consider appropriate means of remediation for forced or child labor should they arise.

7. Our Remediation Processes

Bay Industries Inc. is committed to protecting whistleblowers who acted in good faith, via no disciplinary action; no legal proceedings; and no retaliation. An ethics hotline is available to employees to allow them to report breaches of the law, or other internal policies, in confidentiality through a secure online or phone reporting system. An independent third-party provider operates this hotline. Our workers in each plant operated by Bay Industries Inc. are educated on the existence of the hotline and the number is displayed or communicated clearly to them. All reports through this system are processed and investigated as applicable and appropriate measures are taken when justified.

In respect of Canadian government guidelines, Bay Industries Inc. does not employ any migrant or child labor.

8. Our remediation actions for the loss of income to the most vulnerable families that result from any measure taken to eliminate forced labor and child labor from our operations and supply chains.

Bay Industries Inc. is not currently aware of any instance where its efforts to prevent and reduce the risk of forced or child labor in its activities or supply chains contributed to a loss of income for vulnerable families.

9. Our Training

In 2024, we will be adding child labor content to our annual training and employee handbook. Labor Law Posters are displayed in all locations. Our Code of Ethics is within the current employee handbook and is a condition of working for Bay Industries Inc.

10. Assessing our effectiveness

Bay Industries Inc. does not yet have a formal process for measuring effectiveness in the mitigation and prevention of forced and child labor risks other than a periodic review of our activities, suppliers, and supply chain. Going forward, we will work to develop awareness and a more formal process.

11. Our consultation and governance process

Bay Industries Inc. believes in a high standard of governance, ethics, compliance, and risk management. We work closely with our teams and strategic suppliers and seek to ensure that those associated with Bay Industries Inc. do the same. We strive to ensure that our teams are well informed about Bay Industries Inc. rules and expectations and that they have the tools and training they need to manage risk in their areas of work.

12. Conclusion


Bay Industries Inc. is committed to preventing forced labor and child labor from taking place in our business and our supply chains. We will continue to review all our policies and practices to make continued awareness and prevent the use of forced labor and child labor in our supply chain and operations.

13. Approval and Attestation

This report was approved by the governing body of Bay Industries Inc. on May 24, 2024, pursuant under section 11(4)(b)(ii) of the Act and it has delegated authority to sign the report to Kathleen Jadin, CFO, Bay Industries Inc. to sign the report on its behalf.

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 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.

Dated this 24th day of May 2024

Per: 
Kathleen Jadin

CFO of Bay Industries Inc.

I have the authority to bind Bay Industries Inc.