



Executive Summary

This report outlines the compliance strategy and measures undertaken by Bayview Group Holdings Inc. and its subsidiaries in accordance with Bill S-211, known as the Modern Slavery Act. The purpose of the bill is to require organizations to transparently report the steps they have taken to mitigate the risks of child labor and forced labor within their operational frameworks and extended supply chains. In this context, Bayview has implemented a series of strategic actions designed to ensure our operations are free of exploitative labor practices and that we contribute positively to the global fight against labor abuses.

Identifying Information

- Reporting Entities' Legal Name and Business Number:

Bayview Group Holdings Inc.	764171294
Bayview Construction Ltd.	896724937
Rocky Road Recycling Ltd.	887257509
Bayview Equipment Company Inc.	764166096
Bayview Land Company Inc.	764169496

- Financial Reporting Year: 2023
- Industry: Heavy Civil Construction
- Location: Winnipeg, Manitoba, Canada

Compliance Details as per Section 11 of the Act

Description of Steps Taken to Prevent and Reduce Risks of Forced and Child Labor

Due Diligence Process Implementation

- Bayview has a due diligence process to identify and assess risks particularly associated with U.S. suppliers. This includes conducting thorough reviews of our operational activities to ensure no practices of forced or child labor are present. These reviews are integral to our compliance strategy and are conducted on an annual basis to maintain continuous oversight.

Risk Management Procedures

- Bayview has risk management policies and protocols in place aimed at continuously monitoring and managing risks related to forced and child labor within our operations. These procedures are designed to be proactive and reactive, ensuring that any potential risks are addressed promptly and effectively to safeguard against labor violations.

Remediation Measures

- A remediation plan has been developed to swiftly address any incidences of forced or child labor discovered within our supply chain. This plan includes immediate corrective actions and long-term strategies to prevent recurrence, demonstrating our commitment to ethical labor practices.

Financial Contribution to Affected Individuals

- During the reporting period, there have been no known activities within Bayview's operations or its supply chain that contributed to forced labor or child labor. Consequently, there was no identified need for financial contributions to affected individuals, nor were any contributions made.

Employee Training

- As part of our existing employee training events, Bayview incorporates a segment dedicated to discussing the realities and indicators of forced and child labor. This enables employees to identify the signs of such practices and equips them with the necessary tools to prevent their occurrence.

Effectiveness Assessment

- An annual review process has been implemented to assess the effectiveness of the measures taken against forced and child labor. This process involves adjustments and enhancements to our strategies based on the outcomes of these reviews, ensuring continuous improvement in our compliance efforts.

Supplementary Information Addressing Subsection 11(3)

Structure, Activities, and Supply Chains

- This joint report encompasses all subsidiaries under Bayview Group Holdings Inc., where the policies and practices outlined herein are relevant across the board. Bayview Group Holdings Inc. oversees the operations of four primary entities, each engaging in distinct but related sectors of the heavy civil construction industry:
 - Bayview Construction Ltd.: Specializes in heavy civil road construction, asphalt manufacturing, aggregate mining, road maintenance, and snow removal operations.
 - Rocky Road Recycling Ltd.: Engaged in the processing of recycled concrete aggregate and underground utility works.
 - Bayview Equipment Company Inc.: Owns and rents out heavy equipment for construction purposes.
 - Bayview Land Company Inc.: Manages a portfolio of land and building assets.
- These entities operate under a unified corporate structure with a total employee base of up to 450 individuals.
- Most raw materials, such as concrete and aggregates, are sourced locally, which not only supports the regional economy but also minimizes logistical challenges. However, certain specialized items like heavy equipment, parts, and specific types of oil are imported from the United States. This strategic approach to sourcing balances efficiency with compliance and supports local industries, in line with the transparency and responsibility goals of Bill S-211.

Policies and Due Diligence Processes

Bayview has established clear policies and due diligence processes to uphold ethical labor practices:

- **Forced and Child Labor Policy:** A zero-tolerance stance towards any form of forced or child labor.
- **Supplier Code of Conduct:** Requires all suppliers to comply with labor laws and maintain ethical standards.
- **Due Diligence Process:** Regular reviews and assessments are conducted to identify and mitigate supply chain risks.

Risk Areas

- Potential risk areas in our supply chain have been identified, particularly concerning international procurement, where suppliers may not adhere to the stringent labor standards upheld in Canada.

Remediation Measures

- Should incidents of forced or child labor be detected, immediate actions include the termination of contracts with non-compliant suppliers, alongside other corrective measures.

Employee Training

- Awareness training is conducted regularly for all employees to ensure they are well-informed about identifying and preventing forced and child labor. Detailed documentation of training schedules, content, and employee attendance is meticulously maintained.

Effectiveness Assessment

- Annual reviews are conducted to scrutinize our operations and supply chain. Policies and practices are regularly reviewed and updated based on review findings to ensure continuous improvement.

Conclusion

With the implementation of Bill S-211, Bayview acknowledges the importance of proactive measures to prevent and mitigate the risks of forced and child labor. We are committed to ongoing development of a framework for due diligence and risk management to ensure that our business practices align with the highest standards of ethical labor.

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.

Full Name: Blake Karschuk

Title: President, Bayview Group Holdings Inc.

Date: May 31, 2024

Signature: _____

I have the authority to bind Bayview Group Holdings Inc.