# 2023 ANNUAL REPORT OF BORDER CHEMICAL COMPANY LIMITED UNDER THE TERMS OF THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT OF CANADA, (BILL S-211)

## "THE MODERN SLAVERY ACT OF CANADA"

### **OVERVIEW**

Border Chemical Company Limited is a privately owned company located in the RM of Springfield in Manitoba that produces sulphuric acid and water treatment chemicals, terminals asphalt, and buys and sells fertilizer. Border Chemical does not have a website.

Raw materials are primarily supplied from companies in the businesses of oil and gas, chemicals, and fertilizers. These Suppliers are all located in North America with 95% of our raw materials coming from Canada. None of our raw materials are purchased from third world countries. It is our intention to implement a mechanism to confirm Supplier adherence to our Company Policy regarding forced labour and child labour, and relevant laws. We consider the risk of Modern Slavery in our supply chain to be low.

### **OUR POLICY**

The Company policy is compliant with the Modern Slavery Act of Canada, and its provisions are intended to apply to all Suppliers of the Company in addition to the Company itself.

There can be no forced, bonded or involuntary prison labour and no human trafficking within the Company or its Suppliers. Workers are not required to lodge "deposits" or their identity papers with the Company or any of its Suppliers and are free to leave under their own volition at any time.

The use of Child labour is prohibited. Border and its Suppliers shall adhere to minimum age provisions of applicable laws and regulations.

Children and Young Persons under the age of 18 shall not be employed at night or in hazardous conditions.

Policies and procedures shall conform to the provisions of the Modern Slavery Act of Canada and the relevant provisions of the International Labour Organization (ILO) standards.

A Child is defined as any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory education in which case the higher age would apply.

A Young Person or Young Worker is defined as any worker over the age of a Child as defined above and under the age of 18.

#### **OUR WORK FORCE**

All individuals working for Border who have not already been made aware of this policy will have it brought to their attention in training sessions and have the risks associated with forced and child labour both within the company and our supply chain explained to them. They will be asked to report to management any evidence they may see of forced or child labour in a timely manner.

Border Chemical employs approximately 80 individuals and due to the relatively small size of its work force can attest that none of them are under the age of 18 and none of them qualify as forced labour. There is minimal turn over of employees. New hires have always been over the age of 18 as confirmed by government issued photo ID at the time of hiring. Individuals between the ages of 15 and 18 are seasonally hired for summer work mowing lawns, painting, and other light daytime duties that are removed from any hazardous exposures – all in compliance with provincial legislation.

## **RISKS**

There have been no risks of forced labour or child labour that we have been able to identify within our organization or our supply chain, and accordingly there have been no steps taken to remediate same.

### APPROVAL AND SIGNING

This Report has been approved by the Board of Directors of Border Chemical Company Limited.

I attest that the information in this Report is true, accurate, and complete in all material respects for the purposes of the Modern Slavery Act of Canada, for the reporting year listed above.

Signed this Bday of May, 2024 at Winnipeg, Manitoba.

P.B. Smerchanski, President

**BORDER CHEMICAL COMPANY LIMITED**