



Britespan Group

Forced Labour and Child Labour in Supply Chains Assessment

May 31, 2024



Attention: Steve Burke, Vice President Finance
Britespan Group
688 Josephine Street North RR#1,
Wingham, ON N0G 2W0

Re: Assessment of Forced Labour and/or Child Labour in Supply Chains

Dear Mr. Steve Burke,

Enclosed is the final report for the assessment of Forced Labour and/or Child Labour in Supply Chains for Britespan Group ("Britespan"). The intent of this report is to provide an evaluation of Britespan's current state in response to the reporting criteria of Canada's Bill S-211 - *An Act to support the Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the Bill" or "Bill"). This engagement evaluates all reporting criteria under this Bill. Reporting under this Bill is Britespan's responsibility and is due on or before May 31 of each year, beginning in 2024. This report must be approved by the governing body of Britespan, such as the Board of Directors.

This report also identifies opportunities for Britespan to enhance controls and activities related to Forced Labour and Child Labour within the organization and its supply chains.

We wish to express our sincere thanks to the staff of Britespan for their assistance during the completion of this assessment. Should you have any questions regarding the content of the report, please do not hesitate to contact me at (514) 891-8575.

Regards,

A handwritten signature in black ink, appearing to read "Kevin Joy", is written over a light blue horizontal line.

Kevin Joy, Partner
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T: (514) 891-8575

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Introduction

Britespan Group ('Britespan'), based in Ontario, is a group of related legal entities that primarily designs, manufactures, and distributes steel-framed, fabric-covered buildings. The financial year for which they are reporting is August 1st, 2022, to July 31st, 2023, and there are no other reporting requirements under other jurisdictions. Founded in 2010, the company strives to create reliable, energy-efficient, and custom solutions for a wide range of customers across industries.

This report covers the following legal entities:

- Britespan Building Systems Inc. (809853054)
- Britespan Building Systems of Ontario Inc. (809701469)
- Fabric Building Covers International Inc. (717348528)
- Britespan Systemes de Batiments Inc. (717944888)
- Britespan Holdings Inc. (798279725)
- Britespan Building Systems of the Prairies Inc. (848919437)
- 1822007 Ontario Inc. (814459657)
- 2477988 Ontario Inc. (809598162)
- 2757763 Ontario Inc. (732273339)
- 1264752 Ontario Inc. (866835655)

Structure

Britespan Building Systems Inc. is the parent company and has operated as a corporation (business number 809853054) since 2010. As per the Bill S-211 reporting requirements, Britespan Building Systems Inc. meets two out of the three compliance thresholds related to revenue and asset sizes. As of April 30th, 2024, Britespan Group had 101 active employees.

Activities

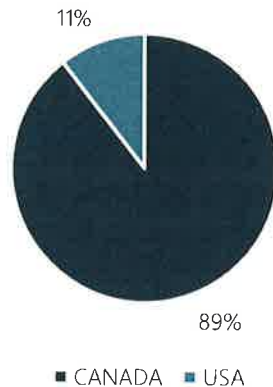
Britespan designs, engineers, manufactures, and distributes steel-framed and fabric-covered buildings for commercial, municipal, public works, and agricultural industries. They service a range of industries, including warehousing, waste and recycling, aviation, agriculture, events and hospitality, military, sports and watercraft, and ports. Britespan also partners with approved dealers that sell the structures directly to the customer.

Supply Chain

The figure below presents the makeup of Britespan's suppliers by country, exclusive of any supplier that

makes up $\leq 1\%$ of total spend on goods. Britespan has roughly 42 direct suppliers; all significant suppliers are based in Canada or the USA.

Britespan - Supply Chain By Procurement Spend



Policies & Due Diligence

Current Policies

Britespan prioritizes the creation of an inclusive, safe, and respectful work environment for all employees. This is reflected in key policies outlined in the company's Code of Ethics, Professional Conduct document, and the Employee Handbook. These underscore Britespan's commitment to employment equity, heat stress management, and the prevention of harassment and discrimination in the workplace.

Employment Equity Policy

Britespan firmly adheres to the principle of equal employment and advancement opportunities for all employees and potential hires. The Employment Equity policy emphasizes the company's commitment to fostering a workplace free from discrimination and harassment, ensuring that all individuals, regardless of background, are treated with dignity and respect, and are provided with fair opportunities for professional growth and development.

Harassment, Violence, Sexual Harassment and Discrimination policy

The Harassment, Violence, Sexual Harassment and Discrimination policy outlines the company's dedication to providing a work environment where all employees are treated with respect, courtesy, tact, and consideration. Any act of discrimination, harassment or violence is unacceptable and will not be tolerated. Workplace harassment, defined as any unwelcome comment or conduct, is strictly prohibited

and can originate from any individual within or outside the company. The policy encourages employees to report any incidents of harassment or discrimination to their leader or Human Resources Department (whichever is more appropriate). If an employee finds themselves a victim or witness of such incidents, they are to raise it with the perpetrator, and keep a written record of instances. They are encouraged to raise the issue to management who will investigate, and any employee found to have violated company policy will be disciplined according to the severity of their actions, which may result in termination. Any employee has the right to make a complaint or enforce their rights under this policy without threats, reprisals, or retaliation.

Recognizing and Treating Heat Stress Policy

Acknowledging the significance of employee health and safety, Britespan has a specific policy to address heat stress and heat stroke. This policy is designed to prevent and manage heat-related illnesses by outlining preventative measures, symptoms of illnesses, and specific roles and responsibilities for addressing heat stress at work. By focusing on the well-being of its employees, the company shows its dedication to maintaining a safe and healthy work environment.

Ontario Living Wage Network Employer Certification License

Having the OLWN employer certification requires Britespan to pay its employees a living wage, as defined by the Ontario Living Wage Network. The living wage is an employee's hourly wage to cover basic expenses and participate in the community. The designated living wage amount is updated annually and corresponds to the specific region where the employee works. This certification indicates Britespan's commitment to fair compensation and supporting the financial well-being of its employees.

Accessibility Policy (AODA)

The purpose behind this policy is to ensure that Britespan provides equal access and participation for people with disabilities by removing and preventing barriers to accessibility. The company complies with the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws. In 2023, Britespan updated its 5-year plan on further improving its accessibility programs as they relate to customer service, company communications, recruitment, employee training, and ensuring compliance with the Ontario Building Code for any new projects. This plan demonstrates that Britespan has a workplace culture of continuous improvement as it relates to inclusivity, accessibility, and welfare for employees.

Due Diligence

Britespan does not have any supplier due diligence policies specific to child or forced labour, however, by predominantly sourcing from longstanding vendors in Canada and the USA, the company mitigates the risk of forced and child labour entering its supply chain. On-site visits to major Canadian suppliers are



conducted occasionally. Britespan also has standard supplier agreements in place that specify conditions regarding material quality, delivery and payment terms, inspections, and circumstances resulting in contract termination.

Supplier Corrective Action Request

Britespan has a standardized form and process to request *supplier corrective action* if contract terms are not met. This form documents the root cause of the issue, the required corrective action, new preventative actions, a verification procedure, and implementation dates and sign offs for each. This information is taken into account when doing annual supplier assessments. If corrective actions are found to not be adequate, engagement with that supplier is terminated and an alternate supplier is identified as a replacement.

Risk Identification & Management

Countries of Operations and Risk

Using the *Walk Free Global Slavery Index* and the *U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour*, a risk assessment was performed on Britespan’s countries of operation. These indexes use in-depth research on forced and child labour and indicate the risks associated with each country. There are low inherent risks of forced labour or child labour in Canada and the USA.

Country	Active Employees as of April 2023 (#)	Inherent Risk per Country
Canada	90	Low
USA	11	Low

Countries of Suppliers and Risk

Using the *Walk Free Global Slavery Index*, a risk assessment was conducted on the countries Britespan’s main suppliers operate in. This index uses in-depth research around forced labour and child labour and indicates the risks associated with each country. Low inherent risks of forced labour or child labour were found in Canada and the USA. Note: Some suppliers were excluded where spend made up $\leq 1\%$ of total goods procurement.

Country	Suppliers (#)	Supply (%)	Inherent Risk per Country
Canada	37	88%	Low
USA	5	12%	Low

Type of Goods Procured and Risk

Using the *Walk Free Global Slavery Index*, a risk assessment was conducted on the types of goods Britespan sources from suppliers that contribute to more than 1% of Britespan’s annual expenditure. This index uses in-depth research on forced and child labour to indicate the risks associated with each type of good. The risk analysis found high inherent risks of forced and child labour from the raw materials of Iron, Zinc, and Cement. The analysis also found an extreme inherent risk for Textiles. This does not mean that evidence of forced or child labour was found to support this risk analysis, but that there is an increased inherent risk that necessitates closer scrutiny to ensure that forced and child labour does not exist through the goods Britespan procures. This includes continuing to monitor goods procured, investigating where suppliers receive their goods, and the risk of forced labour and/or child labour associated these goods.

Goods	Inherent Risk per Good	Country	% Share	Inherent Risk per Country	Overall Risk
Iron	High	Canada	54%	Low	High/Low
Textiles	Extreme	Canada	22%	Low	High/Low
Iron	High	USA	10%	Low	High/Low
Zinc	High	Canada	4%	Low	High/Low
Construction Equipment	Low	Canada	3%	Low	Low
Aluminum	Low	Canada	1%	Low	Low
Doors	Low	Canada	1%	Low	Low
Cement	High	Canada	1%	Low	High/Low
Vents	Low	Canada	1%	Low	Low
Adhesives	Low	Canada	1%	Low	Low
Plastics	Low	Canada	1%	Low	Low

Remediation Measures

Britespan does not currently have remediation measures that specifically address child or forced labour, however they do have measures in place for addressing issues and concerns relating to its employees. Britespan conducts monthly health and safety inspections, co-led by the Health and Safety Committee. All critical deficiencies must be addressed immediately, and other deficiencies are followed up on within 21 days after the inspection.

Britespan has begun contacting key suppliers to verify their adherence to Bill S-211. One of its largest

suppliers has already confirmed it will share a report addressing Bill S-211 obligations and publicly publish the report.

Remediation of Forced & Child Labour & Vulnerable Family Income Loss

Britespan is actively exploring the full scope of its supply chain and continually evaluating procurement practices to strengthen its due diligence processes, including increasing supplier awareness. To date, Britespan has neither identified nor suspected any cases of forced labour or child labour within its operations or those of its suppliers. Consequently, no remediation measures have been necessary regarding forced labour or child labour.

Awareness Training

Britespan does not currently offer training specific to child labour or forced labour. However, as part of its relevant policies under this Act, Britespan includes safety training for all employees deemed high-risk for potential injuries. During the onboarding process, employees are made aware of the safety and health hazards and how to use safety equipment properly. The aim is to help supervisors focus on maintaining a safe work environment, while reducing the stress experienced by new employees who are exposed to a new/changing work environment. Recognizing the need to improve training related to this Act, Britespan will be assessing suitable training options for its staff in the future.

Steps Taken to Prevent & Reduce Risk of Child Labour or Forced Labour

Britespan has taken several measures to lower the risk of child and forced labour in its supply chain. These steps are outlined below:

Commitment to Risk-free Sourcing: Britespan emphasizes sourcing from local vendors and sustaining long-term relationships, thus minimizing the risk of forced and child labour in its supply chain.

Engaging with Suppliers: The company has already begun engaging with suppliers in order to verify their compliance with Bill S-211, and measures taken to improve.

Employee Well-being: The company's policies, such as the Employment Equity Policy, Harassment, Violence, Sexual Harassment and Discrimination Prevention Policy, Heat Stress Policy, and Ontario



Living Wage Network Employer Certification represent a commitment to creating a safe, inclusive, and respectful work environment for all employees.

Remediation Measures: Britespan engages in monthly Health and Safety inspections, and addresses all issues raised within 21 days or less.

Risk Identification and Management: By conducting a comprehensive risk assessment on the countries Britespan operates in, Britespan's suppliers, and the types of goods Britespan procures, Britespan can identify and address potential risks related to forced labour and child labour.

While the company has made progress in addressing forced labour and child labour risks, it recognizes the need for continuous improvement. Britespan is committed to creating a work environment that values and respects every employee while upholding their rights and well-being. The company maintains its stance against forced and child labour practices.

Attestation

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 Britespan. 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: *Ben Hogervorst*

Date: *May 28, 24*

Title: *Owner & sole Director*

Signature: *Ben Hogervorst*

I have the authority to bind 'Britespan Building Systems Inc.'