

## MODERN SLAVERY REPORT

### INTRODUCTION

Founded in 1952, CCTF Corporation (“**CCTF**”) is one of Canada’s largest master distributors of steel pipe and piping products. CCTF was originally a manufacturer of butt weld fittings. In 1954, CCTF broadened its sales base and shifted operations from manufacturing to master distribution.

CCTF has prepared and published this report in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the “**Act**”). This report describes the steps we have taken during the financial year ending December 31, 2023 (the “**Reporting Period**”) to identify, assess, and address modern slavery risks in our operations and supply chain.

### ORGANIZATION

#### Structure

CCTF is an unlimited liability company formed under the laws of Nova Scotia. CCTF operates through three Profit Centres (referred to as “**PCs**”), located in Burlington, Ontario, Vancouver, British Columbia, and Edmonton Alberta.

An affiliate of CCTF, located in London, Ontario, provides certain centralized business support services to CCTF, including Payroll & Benefits, Legal, Audit, Tax, and IT Security and Operations.

CCTF has in excess of 60 employees (referred to as “**teammates**”), all of whom are based in Canada. Each PC is independently managed. Within each PC, teammates report to a Profit Centre Manager. Profit Centre Managers report to our Vice President and General Manager, who, in turn, reports to our President and Chairman.

#### Activities

CCTF’s primary business is master distribution of steel pipe, flanges, fittings, pipe hangers, and tube fittings and valves. CCTF serves wholesale customers in the industrial, oil & gas, commercial mechanical, fire protection, mining, and waterworks market sectors.

As part of its operations, CCTF imports products from outside Canada. During the Reporting Period, the countries of origin of products for which CCTF was Importer of Record were China, India, Italy, Korea, Malaysia, Philippines, Spain, Taiwan, Thailand, UAE, the United States, and Vietnam.

#### Supply Chain

CCTF sources products from suppliers located in and outside Canada for sale primarily within Canada. During the Reporting Period, CCTF had in excess of 45 inventory suppliers. During the

Reporting Period, our top 3 countries of supply, based on total annual spend, were Canada, India, and the UAE.

## **POLICIES AND DUE DILIGENCE PROCESSES**

CCTF has various processes in place to address the risk of human rights violations and modern slavery within our operations and supply chain.

### **Code of Conduct**

CCTF's Code of Ethics and Conduct (the "**Code**") is the foundation of our culture. Our Code applies to all persons employed by CCTF and is designed to create awareness of our legal and ethical expectations and to guide teammates to "do the right thing" in all aspects of our business.

The Code contains the following statement in relation to forced labour and child labour.

CCTF does not tolerate forced labour or child labour in our operations or supply chain and takes active steps to ensure that our suppliers share this commitment. Each year, we ask our suppliers to certify that they do not use forced labour or child labour and that they are not aware of such practices in their supply chains. In addition, we rely on each of our teammates to conduct ongoing due diligence of our suppliers (new and existing) and to report any suspected instances of forced or child labour.

[...]

If you suspect the presence of forced labour or child labour in a supplier's operations or supply chain, contact CCTF's legal department.

We require all teammates to certify that they have read and will comply with the Code on an annual basis. Violations of the Code result in appropriate corrective action.

### **Hiring and Employment Practices**

CCTF has implemented a number of controls in relation to recruitment and hiring. Prior to commencing employment with CCTF, all candidates must participate in an interview with their proposed manager, with certain positions requiring multiple interviews. As a condition of employment, all candidates must be legally entitled to work in Canada. All successful candidates receive a written offer of employment and are entered into a centralized human resources system prior to their start date. Payroll & Benefits are administered by CCTF's affiliate on behalf of CCTF in accordance with applicable legislation.

### **Health & Safety**

CCTF is committed to promoting and ensuring the health, safety and wellness of our teammates. This has led to "No one at CCTF gets hurt" becoming a strategic priority for our organization.

CCTF has implemented this priority through a series of policies (referred to as “SPIs”) which outline controls and requirements to maintain teammate, customer, and visitor safety and to comply with all applicable laws, including provincial occupational health and safety legislation, regulations, rules and standards.

CCTF teammates receive training on safe working conditions and are required to report workplace accidents, unsafe working conditions, unsafe practices, violence in the workplace, or any attempt, threat or suspicion of violence, bullying or harassment. Teammates may do so pursuant to our internal reporting process or by calling or emailing Teammate Support Services, an anonymous forum for reporting known or suspected violations of CCTF’s Code or SPIs.

### **Supplier Due Diligence**

During the Reporting Period, CCTF implemented a due diligence process whereby all inventory suppliers received a compliance document setting out CCTF’s requirements with respect to modern slavery, including that the supplier not use child labour or forced labour in their own operations, that the supplier take reasonable steps to ensure that there are no activities, practices, or conduct that constitute child labour or forced labour in their operations or supply chain, and that the supplier maintain, keep up to date, and enforce their own policies and procedures to ensure that there is no child labour or forced labour in their operations or supply chain. The compliance document also requires that suppliers maintain documentation necessary to evidence compliance with these requirements and to make such documentation available to CCTF upon request. This due diligence process is carried out by CCTF’s Procurement team, Quality Assurance team, and Legal team.

### **Supplier Contracting**

During the Reporting Period, CCTF began incorporating the modern slavery requirements described above directly into our supplier agreements.

## **RISK ASSESSMENT AND MANAGEMENT**

During the Reporting Period, the main area of risk identified was the supply chain for products that CCTF purchases for resale, particularly goods originating outside Canada and the United States. To mitigate this risk, CCTF implemented the supplier due diligence process outlined above.

A secondary area of risk is CCTF’s supply chain for goods and services that are used within our business and for which we contract with third parties, including property management services (waste management, pest control, security, cleaning), IT goods and services (hardware, software, services), office goods and services, and financial services. We have identified this as an area requiring further examination and, if necessary, corrective action.

## **REMEDIATION MEASURES**

During the Reporting Period, we did not identify the existence of forced labour or child labour in our operations or supply chain. As a consequence, we have not undertaken any remediation activities or activities aimed at addressing the losses suffered by those who have lost their income as a result of actions taken by CCTF to eliminate forced labour or child labour from our supply chain.

## **TRAINING**

In addition to incorporating the topic of modern slavery into our Code, during the Reporting Period, we began developing a specialized teammate training module on forced labour and child labour. The training provides an overview of Canada's approach to modern slavery, including the key elements of the Act, describes CCTF's risk mitigation efforts, and provides recommendations on how CCTF teammates can assist in identifying and mitigating forced labour and child labour within our business. The training was developed internally and will take the form of an interactive online course with assessments incorporated at various sections to evaluate the participant's understanding of the material. The training will be available to all CCTF teammates and will be mandatory for certain roles, including leadership, management, and teammates involved in quality assurance, vendor selection and/or purchasing.

## **ASSESSING EFFECTIVENESS**

During the Reporting Period, there were no reported instances of forced labour or child labour within CCTF's operations. If CCTF were to receive a report of forced labour or child labour within its operations, CCTF would immediately investigate the matter with the assistance of the Legal and/or Audit team, as appropriate. If forced labour or child labour were found to have occurred, CCTF would act swiftly to remove the teammate from harm, provide the teammate with post-removal assistance, and take disciplinary action against any teammate(s) determined to have employed forced labour or child labour practices.

During the Reporting Period, CCTF did not identify any instances of forced labour or child labour within its supply chain. If such instances were found to exist, CCTF would take immediate action to address the situation with the supplier, confirm that corrective measures have been taken to prevent the continuation of forced labour or child labour and, if the supplier failed to take such corrective measures, cease doing business with the supplier.

CCTF is committed to expanding and improving its approach to identifying and mitigating the risk of forced labour and child labour within its operations and supply chain. In 2024, CCTF's priorities in relation to modern slavery include:

- continuing to conduct due diligence on existing and prospective suppliers;
- creating an SPI on forced labour and child labour, including actions to be taken when evaluating prospective suppliers;

- incorporating modern slavery risk identification mechanisms into our supplier onboarding process; and
- launching our internal training module and tracking teammate completion.

## **ATTESTATION**

In accordance with the requirements of the Modern Slavery 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.

This report has been approved by the Board of Directors of CCTF Corporation on May 23, 2024.



Trevor Torgerson, Vice President and General Manager

I have the authority to bind CCTF Corporation.

May 27, 2024