



# Giusti Group Limited Partnership

## GIUSTI GROUP

### Modern Slavery Statement

2024



## Giusti Group LP Modern Slavery Statement

### FY2024 Introduction

Giusti Group Limited Partnership ("Giusti Group") is a leading independent, family-owned and operated subcontractor that specializes in concrete formwork placement, with services consisting of multi-family parkade structures, multi-family townhome projects, commercial parkade structures, and high-rise residential / commercial structures. Our strength and knowledge of concrete formwork placement and construction over the past 45+ years has allowed us to build a strong team of professionals to take projects from start to finish. From installing formworks on footings and pads, cribbing walls, columns, and core systems, and installing engineered suspended slabs complete with supply and install of rebar, concrete delivery and placement. Giusti Group Limited Partnership is a leading full-service concrete contractor in Western Canada

Our dedicated team will produce a superior foundation product, reduce labor and material wastage, and ultimately meet and exceed our clients projected timelines.

For the the newly established Fighting Against Forced Labour and Child Labour in Supply Chains Act which passed as law on May 11, 2023, Giusti Group has become a reporting entity pursuant to the Act coming to effect in 2024. As a result, this Statement speaks to steps that Giusti Group has and intends to implement to address risks of modern slavery in our organization and within our supply chain. It is planned to strengthen and mature our modern slavery compliance framework in future reporting periods.

In this regard:

*"Giusti Group has a proud family history and tradition of working respectfully and fairly with our business partners, employees, customers and the communities we serve within Western Canada. This approach strongly aligns with our responsibilities to address modern slavery risks within in our workforce and supply chain.*

*We will continue to build and renew our frameworks and processes to enhance our commitment to ensuring that we respect human rights, prevent violations and address any adverse impacts we encounter."*

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.



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I have the authority to bind  
Giusti Group (GP) Ltd. as General Partner for Giusti Group Limited Partnership

Gildo Giusti  
Vice-President & Director

## Reporting Entity

The reporting entity is Giusti Group (GP) Ltd. as General Partner of Giusti Group Limited Partnership (“**Giusti Group**”). Giusti Group LP is a privately held limited partnership operating within the Canadian provinces of British Columbia and Alberta.

### 1. Structure, Operations and Supply Chains

#### 1.1 Our structure

Giusti Group is based in Western Canada with our head office at 4 Industry Way SE Calgary Alberta. While based in Calgary, we service the entire region of Western Canada with a satellite office in Parksville British Columbia, serving customer job sites in communities throughout the region with a dynamic and mobile workforce.

Giusti Group employees around 200 full-time and part-time employees across our service tiers and locations outlined herein.

#### 1.2 Our operations

1.2.1 Giusti Group is a multi-faceted concrete formwork subcontractor providing the following services:

##### 1.2.1.1 Multi Family Parkade Structures

- Strip footing and Pads
- Columns
- Full Height and Frost Wall
- Slab on Grade
- Suspended Slabs

##### 1.2.1.2 Industrial/Commercial Projects

- Strip footing
- Pile Cap
- Frost Wall
- Grade Beams
- Slab on Grade

##### 1.2.1.3 High Rise Towers

- Footings and Pads
- Mud Slab
- Raft Slab
- Columns
- Walls and Core Systems
- One sided Walls for Shot-crete

1.2.1.4 Heavy Civil Projects

- Footings and Pads
- Mud Slab
- Raft Slab
- Reservoir Cribbing
- One sided Walls for Shot-crete

1.2.1.5 Equipment/Rentals

- Bobcats/Skid-steers
- Rough Terrain Forklifts
- ½ ton to 5 ton Delivery Trucks
- Semi Trucks and Trailers (city and highway)
- Mobile and Tower Concrete pumps



### 1.3 **Supplier relationships and supply chains**

Our suppliers are integral to our business and our ability to provide a wide array of services to our clients of a high-quality standard. We have always shared the belief that our suppliers should align with our values and comply with health, safety, quality, environmental and ethical standards. Based on this, we seek long term stable relationships with our suppliers.

We summarize our core supply chains as follows:

- 1.3.1 **Base materials.** (e.g. materials used to manufacture products such as concrete or rebar).
- 1.3.2 **Plant and Equipment** (e.g. scaffolding, concrete forms, bobcats, cranes, etc.).
- 1.3.3 **Vehicles** (e.g. heavy transport vehicles, and passenger vehicles).
- 1.3.4 **Consumables, inventory and other products and services** (e.g. fuels and oils).
- 1.3.5 **Office equipment** (e.g. mobile phones, computer equipment and office supplies)
- 1.3.6 **Essential supplies** (e.g. personal protective equipment)
- 1.3.7 **Service providers** (e.g. cleaners, consultants, IT support, subcontracted labour).

We predominantly engage suppliers based within Western Canada, with most of our suppliers based in Canada. Some of our scaffolding and forming equipment is supplied from a well-known and reputable supplier based in Europe.

In the next reporting period and beyond, Giusti Group is committed to extending our due diligence to obtain a greater understanding of our supply chains and continue to dig deeper into our understanding of the risks involved.

## 2. Risks of Modern Slavery

### 2.1 Our approach to risk

It is often perceived that for an entity operating in Canada and engaging direct Canadian suppliers, our risk of modern slavery is relatively low in our operations and supply chains. However, we understand that we are not immune to the impacts and risk of modern slavery within Canada.

Furthermore, we understand that as we delve deeper into supply chains, the risk of modern slavery can be heightened due to lack of visibility. Additionally, it is likely that many suppliers deeper in supply chains are based overseas and may present heightened modern slavery risks associated with their jurisdiction, industry, and the products / services that they provide to us directly.

We intend to commence scoping and assessing risk connected with our suppliers that we engaged in FY24 through a due diligence screening process. The due diligence screening process involves screening our suppliers for modern slavery risk and broader environmental, social and governance (ESG) risks for a broader, holistic risk assessment.

Giusti Group understands that proper due diligence screening should not be the only source to ascertain risk profiles of suppliers. The following factors are important to scope risks with suppliers.

Type of risk	Explanation of risk
Jurisdiction risks	Certain countries or third world jurisdictions present higher risks of modern slavery. This can be due to factors such as socio- economic status, poor governance, conflict and migration.
Industry risks	Certain industries carry heightened risks for modern slavery. This is often due to certain characteristics, products and process of the industry. For example, the PPE manufacturing industry is heavily reliant on migrant workers and contract workers which increases the prevalence of modern slavery of this industry.
Product and service-based risks	Some products and service carry heightened modern slavery risk due to how they are processed, provided or sourced and the level of regulation in the local jurisdiction that requires ongoing review and assurance that acceptable production methods and practices are utilized.
Entity based risks	Organizations who treat their employees poorly and / or have poor governance structure carry heightened risks for modern slavery. For example, if an organization has shown non-compliances with labor standards (which may show up through the independent screening process outlined above), this could be considered a risk indicator for modern slavery.

In addition to modern slavery risks, there are risk indicators for modern slavery which, while not obvious instances of modern slavery, may indicate broader modern slavery practices or risks in the relevant supplier. Some examples of modern slavery risks factors include:

- o Inadequate work, health and safety practices, failure to maintain adequate exits and signage.
- o Lack of personal protective equipment (PPE).
- o Significant unpaid overtime or failure to pay overtime rates.

## 2.2 Risks identified

### 2.2.1 Risks in our operations

Giusti Group, as an entity operating solely in Canada, operates in highly regulated industries and in jurisdictions where the prevalence of modern slavery is considered low. In addition to this, we pay our employees in accordance with local employment standard requirements, and ensure that all of our employees are engaged under an employment contract with transparent terms and conditions.

Additionally, our corporate governance framework is transparent and robust for our employees, contractors, suppliers and other eligible disclosers to report concerns (including modern slavery concerns). This ensures that our employees, contractors, suppliers and broader eligible disclosers have a reporting mechanism with a prescribed process and the ability to report confidentially and without fear of intimidation, disadvantage or reprisal.

### 2.2.2 Risks in our supply chains

As outlined above, we have undertaken an initial risk assessment of our suppliers through a due diligence screening process. Based on that process, in conjunction with consideration of broader jurisdiction, industry, product / service and entity risk factors, the high-risk industries that encompass our suppliers are:

Supplier type	Risk assessment
Construction and raw materials	<p>The construction and manufacturing sector carries heightened modern slavery risks due to the complexity of the supply chains and prevalent modern slavery risk indicators such as employees working in hazardous working environments and working excessive hours.</p> <p>Giusti Group purchases raw materials to use in products (for example, concrete/rebar). The vast majority of materials used in Giusti's products are sourced from local Canadian suppliers.</p> <p>There is an inherent risk associated with suppliers in this industry, even though the majority of our suppliers in this supplier type being based in Canada. This is an ongoing risk industry for Giusti Group which we will monitor and gain oversight over.</p>

PPE	PPE has been a high-risk sector, largely as a result of the supply chain impacts since most of these products are sourced from Asian based countries, where instances of modern slavery are likely inherently higher. Giusti Group will monitor this high-risk sector as an ongoing risk factor.
Contractors and labour recruitment	<p>While most of our labour is hired locally and internally, we do engage contractors to fulfill employee gaps to ensure that we can fulfill our services on time to our clients.</p> <p>Labour hiring and recruitment poses modern slavery risks through the use of third-party labour hire contractors due to the lack of visibility over these hire arrangements.</p> <p>All of our recruitment and labour hire providers are based in Canada and our contractors are skilled workers which can reduce the risk of modern slavery. Irrespective of this, this sector poses an ongoing risk for Giusti Group.</p>

### 3. **Actions Taken to Address Risks of Modern Slavery**

As previously noted, Giusti Group became aware it was a reporting entity in 2024 under this new law passed in 2023. As a result, Giusti has, and will continue to take further steps to understand its requirements regarding implementing a modern slavery compliance framework and the types of initiatives and actions required to address identified risks of modern slavery.

To assist with this process, we have engaged external consultants to assist with the planning and implementation of our modern slavery compliance framework. Our external consultants will assist us in navigating the complexities of modern slavery compliance and develop action plans to mature and develop our modern slavery compliance framework.

In addition to this, our external consultants have begun to assist in undertaking due diligence screenings with our suppliers to gain our initial risk assessment which is outlined above.

Through this process, we have identified our suppliers against the following risks:

**ESG risks:** e.g. modern slavery, breaches of environmental legislation, breaches of labour standards.

**Financial risks:** e.g. financial irregularities.

**Integrity risks:** e.g. bribery and corruption risks.

**Data and cyber risks:** e.g. data security and data breaches.

**Operational and quality risks:** e.g. product and service quality risks..

These independent due diligence screenings are the start of the implementation of our supplier due diligence processes which will be expanded on in the next reporting period.



Based on this, moving forward, Giusti Group plans on implementing the following key aspects of our modern slavery compliance framework.

- 3.1 Assessing and reviewing our policies and procedures regarding modern slavery and based on this assessment either, amend existing policies and procedures or implement a modern slavery policy.
- 3.2 Develop and implement a supplier code of conduct.
- 3.3 Map out and develop our due diligence framework. To assist with streamlining and tracking due diligence on our suppliers, Giusti Group will use various methods to monitor the following by:
  - 3.3.1 scoping and risk assessing suppliers;
  - 3.3.2 screening suppliers;
  - 3.3.3 issuing questionnaires to suppliers and automating risk classifications on those suppliers; and
  - 3.3.4 tracking any non-compliances and therefore remediation.
- 3.4 Training of employees to explain modern slavery and due diligence requirements on suppliers.
- 3.5 Implement modern slavery contractual clauses into our contracts.
- 3.6 Assign responsibility in our organization for our modern slavery compliance framework.

As outlined above, Giusti Group will continue to develop a grievance mechanism for our employees, contractors and suppliers to report concerns through to continue to identify potential issues. This will be reviewed as part of a policy and procedure review.

All of the scoped actions above will form the basis of our compliance framework going forward with a view to taking genuine and meaningful action as to our systems and process to enable us to identify risks of modern slavery.

#### 4. **Assessment**

As noted above, we are in the process of developing and implementing our modern slavery compliance framework. We will continue this process in the next reporting period with the guidance of our external consultants.

##### Policies and due diligence

To reduce the risks of forced labour and child labour in our supply chains, we continue to adopt policies, codes of conduct, programs, and rules to comply with Canadian employment and labour laws, including laws concerning minimum age of work, wages, hours of work, collective bargaining rights, and health and safety. Moving forward, we will assess and review our policies and procedure and amend existing policies or implement a modern slavery policy.

##### Remediation measures and remediation of loss of income

To date, we have not received any complaints relating to forced labour or child labour in our operations or supply chain, and as such have not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour. We will continue to develop a grievance mechanism for employees, contractors, and suppliers to report concerns through to continue to identify potential issues, as well as tracking non-compliance and therefore remediation.

##### Employee training

We provide ongoing training to employees to comply with Canadian labour and employment laws and uphold our standards and expected standards of conduct. In the reporting year, we did not provide training to employees specifically on the risks and indicators of forced labour or child labour in our supply chains. Moving forward, we are committed to training employees to explain modern slavery and due diligence requirements on suppliers.

Laying the foundations of our modern slavery compliance framework is critical to ensure that we meaningfully comply with the requirements of the Act. Establishing a strong foundation will mean that we can continue to expand our framework in future reporting periods as we evaluate the effectiveness of our framework year on year.

In the next reporting period and beyond, we will assess the effectiveness of the actions implemented in this reporting period as our modern slavery compliance framework and associated systems mature. Giusti Group understands that we must continually assess our processes and systems within our modern slavery compliance framework.

Overall, Giusti Group has clearly identified the steps to be taken to develop and implement a compliance framework, allowing us to measure the effectiveness of our actions in future reporting periods.

#### 5. **Other information**

Giusti Group is looking forward to building on the initial steps mapped and undertaken in this reporting period to develop and mature our modern slavery compliance framework.

As a new entry to this regulatory environment, we are beginning the process of building the foundation of our modern slavery compliance framework. We will continue this process during FY24, and we will be able to review our due diligence framework and broader processes and procedures to be able to assess their effectiveness and continually improve our modern slavery compliance for future reporting periods.