



Kel-Gor Limited
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Canada Bill S-211 Annual Reporting Letter

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Company Name: Kel-Gor Limited
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Executive message

Kel-Gor Limited is proud to demonstrate our commitment to reducing and preventing forced and child labour through our global partnership with Transparency-One (www.Transparency-One.com) for supply chain mapping, multi-dimensional risk assessment and monitored mitigation/due diligence. Transparency-One enables Kel-Gor Limited to identify, connect and collaborate directly with supply chain partners from finished goods to raw materials to assess and mitigate risk based on transparency of primary data.

Company structure, activities, and supply chains.

Kel-Gor Limited has extensive experience managing and executing pipe fabrication and installation, module assembly and installation, mechanical systems, instrumentation and controls, insulation and fireproofing, electrical systems, painting, and civil work services for our clients. We have long-term maintenance turnaround agreements as well as new construction work for customers across North America.

Kel-Gor Limited has standardized on Transparency-One to operationalize supply chain mapping for products which can extend from finished products to the raw material countries and sources. The **supply chain overview metrics** provided below are monitored in the system and represent a current overview of Kel-Gor's footprint.

# of Impacted Products	# of Tier-1 Suppliers	Total # of supply chains mapped	Total # of Countries (supply chain)
~ 1000	~ 250	~ 10	~ 50

Policies and Due Diligence relating to forced and child labour.

Kel-Gor Limited has stringent policies and due diligence processes in place to ensure compliance with international labor laws and standards. Kel-Gor's policies strictly prohibit any form of forced or child labor in its supply chain. The company conducts audits and assessments to monitor and ensure compliance among its suppliers. Compliance metrics are tracked, with key performance indicators such as audit scores, compliance rates, and training completion rates being closely monitored.

Kel-Gor collaborates with various industry bodies, and compliance organizations to strengthen its labor practices and ensure alignment with global standards. Additionally, Kel-Gor requires all suppliers to align with internal policies which forbids forced and child labor and mandates compliance with these standards as a condition of doing business. This proactive approach not only ensures compliance but also fosters a culture of transparency and ethical responsibility throughout Kel-Gor's supply chain.

Kel-Gor Limited has standardized on Transparency-One to consolidate and digitize all regulatory requirements, procurement expectations and ethical values related to reducing and preventing forced and child labour. The **supply chain compliance metrics** provided below are automatically monitored in the system and represent our policies-in-action, representing both our policy framework AND our due diligence process per policy.

CSR Policy (Forced and Child Labour)	Type of collaboration	# of Suppliers monitored
HSMS-POL-1.17	Policy Acceptance, Document Compliance	~ 250

Business and supply chain areas that carry a risk of forced and child labour.

Kel-Gor operates in various regions and industries where the risk of forced and child labor can be prevalent. To mitigate these risks, the company conducts detailed risk assessments across its business and supply chain. Here are the key areas, affected business groups, products, and assessments:

- o Materials Sourcing
- o Manufacturing
- o 3rd Party Suppliers

Affected groups can be: Purchasing, Manufacturing, EH&S, and HR.

Products affected can be: Industrial manufacturing components, industrial PPE products & textiles, and electronics.

Assessment scores will be based on several factors:

- o Country of Origin Risk Index
- o Supplier Scores / Compliance
- o Incident Reports / results

Based on these noted factors, suppliers are categorized as low, medium, or high risk. High-risk suppliers, particularly those scoring below 70 on the audit score and operating in countries with a risk index above 7, receive increased scrutiny and are required to implement corrective action plans.

Kel-Gor's use of Transparency-One includes a standardized scorecard of risk related to forced and child labour and maintains full attribution of supply chain risk to the products and business groups that manage the products. The **supply chain risk assessment** data provided below describe the business groups and products that Kel-Gor has assessed to carry risk of forced and child labour.

Business Group	Product (supply chain)	Risk Assessment Score
Purchasing group / SCM	Industrial Manufacturing Components (Pipe)	95

Steps used to manage business and supply chain risks.

Kel-Gor employs a comprehensive approach to manage business and supply chain risks related to forced and child labor. This approach involves several key steps designed to ensure compliance with ethical standards and mitigate the risks associated with labor abuses. Here are the detailed steps:

- Risks Assessments:
 - Initial Screening
 - Supplier Evaluations/Assessments
- Supplier Engagement:
 - Agreements
 - Training & Partnerships
- Monitoring
 - Audits
 - Verification
- Corrective Actions
 - Immediate incident response & action plans
 - Verification & continuous improvement mindset
- Performance Metrics
 - KPI's

Kel-Gor has committed to supply chain mapping, transparency, and compliance as a core process within business risk assessment. Kel-Gor utilizes Transparency-One for traditional "top -> down" risk management by extending the direct influence of our supplier development resources to previously unknown and unreachable tiers of our supply chain. And now, importantly, resilience risk can now be visualized and from the bottom -> up in the system by identifying sub-tier sources that have become crucial for multiple finished products and business groups.

Measures taken to remediate forced and child labour.

Kel-Gor takes measures to remediate forced and child labor in its supply chain, focusing on immediate interventions, corrective actions, and long-term solutions. Upon identifying violations, Kel-Gor deploys rapid incident response teams for investigations and temporarily suspends dealings with non-compliant suppliers. Collaborative corrective action plans are developed with clear deliverables and timelines, supported by resources and technical assistance to help suppliers improve labor practices. Follow-up audits and verification checks, ensure ongoing compliance. To support affected workers, Suppliers and workers receive regular training on ethical labor practices and labor rights, respectively. Partnerships with local governments, and international organizations enhance remediation efforts, while industry collaborations promote collective action against labor abuses. Transparent reporting of incidents and remediation efforts through stakeholder engagement ensures accountability and continuous improvement. These measures, integrated with monitoring systems, demonstrate Kel-Gor’s commitment to eliminating forced and child labor, fostering a culture of ethical responsibility across its supply chain.

Kel-Gor has extended use of Transparency-One to monitor assignment, completion, and outcome of specific supply chain requirements for suppliers with an identified risk of forced and child labour. The **supply chain risk mitigation metrics** provided below are monitored automatically by the system and describe the measures and methods undertaken by Kel-Gor to reduce and prevent these risks.

CSR Risk (Forced and child labor) mitigation	# of Suppliers monitored
Policy review, Education/training, Desktop audit.	~250

Monitoring the effectiveness of our efforts.

Kel-Gor uses a comprehensive set of Key Performance Indicators (KPIs) to monitor and evaluate the effectiveness of its efforts against forced and child labor within its supply chain. These KPIs ensure continuous improvement and accountability in upholding ethical labor standards. Here are the key KPIs:

1. Audit Compliance
2. Incident Reporting
3. Corrective Actions
4. Supplier Training and Engagement
6. Supplier Performance and Risk Management
8. Continuous Improvement

By regularly monitoring these KPIs, Kel-Gor ensures the effectiveness of its efforts against forced and child labor, promoting ethical labor practices and safeguarding worker rights across its supply chain.



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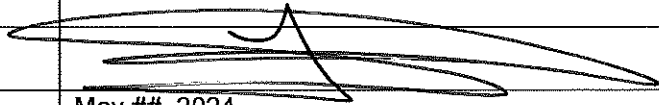
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Kel-Gor Limited has standardized on a set of metrics/KPIs that are automatically monitored in Transparency-One to provide continuous visibility on the supply chain risk scorecards and benchmarks for continuous improvement.

Closing

Kel-Gor reaffirms its unwavering commitment to eradicating forced and child labor within its supply chain, particularly in North America. The company emphasizes its proactive measures, including rigorous supplier audits, comprehensive corrective action plans, and extensive worker support programs. Through collaboration with industry bodies, NGOs, and regulatory agencies, Kel-Gor continually enhances its practices and upholds the highest ethical standards. The company remains dedicated to transparency, accountability, and continuous improvement, ensuring a safe and fair working environment for all involved. Kel-Gor's steadfast efforts reflect its core values and commitment to social responsibility in the fight against forced and child labor.

Signature

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Signature	
Date	May ##, 2024 31,