



League Projects Ltd.

# League Projects Ltd. Forced Labour Report

For Immediate Release

Introduction:

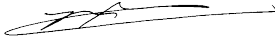
This report outlines the measures League Projects Ltd (8755315365). has undertaken during the previous financial year to prevent and reduce the risk of forced labour or child labour within our operations and supply chain, in compliance with the Canadian Supply Chains Act. League Projects Ltd. is an oil and gas construction company that operates in western Canada. The report addresses the mandatory information requirements as specified in the Act and covers the steps taken during the fiscal year of 2023 with the financial year ending Aug 31, 2023.

Approval and Attestation:

“In accordance with the requirements of the Act, and in particular section 11 therefor, I attest that I have reviewed the information contained in the report for the entity 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”.

Full name: Brent J Sieben

Title: Chief Executive Officer

Signature: 

Date: May 29<sup>th</sup>, 2024

I have signing authority to bind League Project Ltd.

## **Structure, Activities, and Supply Chains**

League Project Ltd. is a corporation operating in the oil and gas industry. This entity has a robust organizational structure with multiple departments including, construction, operations, quality control, health, safety, and environment, human resources, equipment, payroll, and accounting. The company's head office is located in Brooks, Alberta, and it has multiple project sites across western Canada. The organizational structure includes a clear chain of command, with each department having specific roles and responsibilities.

### **Activities:**

Our primary activities involve the construction and maintenance of oil and gas infrastructure. This includes pipeline construction, facility maintenance, and related services. We operate predominately in Canada, with various project spanning across the western regions of the country, including Alberta, British Columbia, and Saskatchewan. Our activities encompass the entire lifecycle of oil and gas infrastructure projects, from receiving planning and design from our clients, and executing the project requirements.

### **Supply Chains:**

Our supply chains include suppliers of raw materials, construction equipment, and specialized labour. We source our materials from both domestic and international suppliers, exclusively located in regions of North America. Additionally, we engage specialized subcontractors for certain technical tasks associated with project demands. Our procurement process includes thorough vetting and continuous monitoring to ensure compliance with our standards.

### **Polices and Due Diligence Processes**

League Projects Ltd. has recently developed and implemented comprehensive polices to address forced labour and child labour risks. These polices include a Supplier Code of Conduct, which mandates compliance with international labour standards. Our policies are designed to ensure that all our supplies adhere to ethical labour practices. We will communicate clearly with our current and future suppliers these polices and will include them in our contractual agreements. Our polices also extend to our internal operations, ensuring that our work force is treated fairly and ethically in alignment with provincial labour requirements. All current employees will review and acknowledge our newly implemented *Forced Labour and Child Labour Prevention Policy*.

### **Due Diligence Processes:**

Going forward, we will ensure to conduct regular risk assessments and audits of our supply chains to identify and mitigate potential forced labour and child labour risks. Our due diligence process will involve:

- Embedding responsible business conduct into management systems
- Conducting periodic reviews and assessments of current and future suppliers
- Implementing corrective action plans for identified risks
- Maintaining a risk assessment framework that evaluates the likelihood and impact of forced labour and child labour in different segments of our supply chain
- Conducting audits of suppliers as needed

### **Forced Labour and Child Labour Risks**

#### **Risk Identification:**

If we identify certain aspects of our supply chains that carry a higher risk of forced labour and child labour, particularly in regions with less stringent labour laws as compared to Canada. To manage these risks, we have implemented the following measures:

- Mapping our supply chain to identify potential risks. This involves a detailed analysis of our suppliers and their geographical locations
- Engaging with suppliers to ensure compliance with our local and company wide labour standards. We require all our suppliers to provide detailed information about their labour practices and audits, if deemed required. If on-site audits are not feasible due to supplier location or any other reason, we will request proof of recent audits and their findings. These audits include interviews with employees, inspections of working conditions, and reviews of customers.
- Developing a risk profile for each supplier based on factors such as the country of origin, industry practices, and historical compliance with labour standards

#### **Preventative Measures:**

To stop forced labour or child labour from happening in the first place, League Projects Ltd. has:

- Developed a clear code of conduct that outlines our company's stance on forced and child labour. This code will be communicated to all suppliers and includes expectations for fair labour practices throughout their operations.
- Created a new Child and Forced Labour Policy that identifies modern slavery.
- Included clear anti-forced and child labour clauses in all our supplier contracts.

### **Remediation Measures:**

In instances where forced labour or child labour is identified, we will take immediate action to remediate the situation. This includes:

- Working with suppliers to rectify the issue.
- Providing support and resources to effected employees.
- Monitoring the situation to ensure compliance with our standards. Follow up audits to ensure corrective actions have been implemented will be issued.
- Continue to seek further remediation as necessary.

### **Training**

#### **Employee Training:**

While League Projects Ltd. does not offer specific training to employees or suppliers on modern slavery, we ensure that our employees are aware of their obligation to refuse unsafe work and to report any unsafe conditions, in alignment with Alberta Occupational Health and Safety legislation. This includes:

- Ensuring employees understand their right to refuse unsafe work and report once identified
- Ensuring our recruitment team follows Alberta Labour code requirements for hours of work, over time, minimum wage, etc.
- Training implemented if any above points are not met by employees

Going forward, we will implement an acknowledgement in our new hire orientation documents that will prompt the new hires attention to understanding what forced labour and child slavery is.

### **Assessing Effectiveness**

To ensure the effectiveness of our measures, we:

- Regularly review and update our polices as needed.
- Monitor and evaluate outcomes of remediation efforts.
- Seek feedback from stakeholders and continuously improve practices.
- Identify all tiers of supply chain and ensure our raw materials purchased are from ethical locations and entities.
- Ensure employees are made aware that they always can report any issues on forced labour seen to the Human Resources Department, the HSE department, or their direct supervisor.
- Monitor supplier compliance audits as needed.
- Regular review and assessments as needed.

**Feedback Mechanism**

We encourage our stakeholders to provide feedback on our report and our efforts to combat forced labour and child labour. Feedback can be given by contacting one of our office locations and communicating this with our Human Resources department.

*This report is prepared following the guidelines and requirements specified in the Canadian Supply Chains Act.*