

## **2023 FORCED LABOUR AND CHILD LABOUR REPORT (the “Report”)**

The following is a joint report prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) by MCP Access Holdings Inc., (“MCP Access”, and, together with its subsidiaries, “Northstar”, or the “Company”, “our” or “we”), NorthStar Scaffold Services Inc. (“NorthStar Scaffold”) and its wholly-owned subsidiaries, Northstar Access Corporation (“Northstar Access”), Carp Road Holdings Ltd. (“Carp Road”) and Access Rigging Services Inc. (“Access” and, together with MCP Access, NorthStar Scaffold, Northstar Access and Carp Road the “Reporting Entities”). Each of the Reporting Entities is incorporated pursuant to the *Business Corporations Act* (Ontario). This Report provides an overview of the measures, actions and activities undertaken by the Reporting Entities to assess, prevent and reduce the risk of forced labour or child labour in their business and supply chains. This Report applies in respect of Reporting Entities’ financial year ending December 31, 2023 and is the first report prepared by the Reporting Entities under the Act.

### **1. CORPORATE STRUCTURE, BUSINESS AND SUPPLY CHAIN**

We are a trusted and reliable seller, lessor and distributor of scaffolding, shoring, and other access, construction and renovation goods and solutions in Canada for over 50 years. We also provide services relating to installation and dismantling, design and engineering, site preparation and emergency rapid response. As of December 31, 2023, we employed approximately 300 individuals in Ontario, Manitoba and British Columbia. Northstar’s head office is located in Toronto, Ontario and it operates from five branches across Canada in Ontario, Manitoba and British Columbia. NorthStar Scaffold, Northstar Access, Carp Road and Access are each operating companies for our different business lines within the MCP Access organization.

Northstar aims to achieve transparency with its suppliers and is focused on critical issues in supply chain management, including ethical procurement and compliance with applicable laws. We have a network of reputable domestic and American suppliers supporting our Canadian operations, including DSS, North Scaffold Products, Proscuff, Superchute, Tops and Layher. These suppliers are economically diverse in terms of size. The vast majority of our suppliers are based in Canada and less than 1% of our total purchases are imported directly from the United States.

With respect to our direct supply chain, our main suppliers provide a range of goods and services to us, including:

- Swing stages;
- Frames and bracing;
- Planks and platforms;
- Shoring scaffolding;
- System scaffolding;
- Aluminum tubing and clamps;
- Fencing and other edge protection components;
- Material hoists;
- Scaffold tarps, shrink wrap and other debris netting; and
- Debris chutes.

### **2. POLICIES AND PROCEDURES RELATING TO FORCED LABOUR AND CHILD LABOUR**

In 2023, we worked to better understand our reporting obligations under the Act as they pertain to Northstar and its supply chains and determined the risk of child labour or forced labour to be low. In the past year, we have undertaken supply chain mapping exercises, conducted an internal assessment of risks of forced labour and/or child labour in the our activities and supply chains, carried out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour and monitored our suppliers for risks of forced labour and child labour.

We have also imbedded responsible business conduct directly into our policies and management systems. We have made efforts to source goods used in our business from responsible and reputable suppliers. We undertake due diligence of our suppliers during the procurement process to understand (i) whether they and their supply chains are at risk of forced labour and child labour, (ii) the source countries for materials used in our supply chains and (iii)

human resources and union hiring practices and sourcing practices as it relates to those working throughout our supply chains.

### **3. AREAS OF RISK**

We continue to strengthen our policies and procedures to reduce risks associated with forced labour and child labour. As part of the aforementioned due diligence of our suppliers, we have begun the process of identifying forced labour and child labour risks in our supply chain, though there are still gaps in our assessment. To date, we have determined that our activities and direct supply chains carry a risk of forced labour and child labour as it relates to our tier three suppliers and those further down the supply chain. In 2024, we will continue to assess our supply chains for risks of forced labour and child labour

### **4. REMEDIATION MEASURES**

To date, we have not identified any instances of forced labour or child labour in our supply chains and no situations have arisen requiring the implementation of remediation measures, including the remediation of loss of income on impacted families.

### **5. TRAINING**

In 2023, Northstar did not provide formal training on forced labour and child labour to its employees.

### **6. ASSESSING EFFECTIVENESS**

Northstar acknowledges that forced labour and child labour are possible risks within its business and supply chains. We undertake various steps to address this risk, including periodically reviewing our policies and business practices to ensure that they reflect our commitment to implementing effective procedures to reduce the risk of modern slavery in our business and supply chains.

### **7. ATTESTATION**

This Report was approved by the board of directors of MCP Access pursuant to section 11(4)(b)(ii) of the Act.

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 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.

Signed "Jonathan McCain"

Jonathan McCain  
Director, MCP Access Holdings Inc.

I have the authority to bind MCP Access Holdings Inc.

May 30, 2024