

BILL S-211

SUPPLY CHAIN STAKEHOLDER REPORT

2023 Fiscal Year



**TRANSFORMING
INNOVATION**



PTI Transformers Inc.
1155 Park Street
Regina, Saskatchewan
Canada S4N 4Y8
Ph: 306.721.3114



May 31, 2024

Subject: Bill S-211 Supply Chain Stakeholder Letter

Dear PTI Transformers Stakeholder,

On May 11, 2023, Bill S-211: An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff received Royal Assent. On January 1, 2024, the Act came into effect requiring entities to report on forced and child labour within Canadian supply chains on a yearly basis with reports due on May 31 each year.

PTI Transformers meets the criteria necessary to be considered an "Entity" in the Act and is required to report. Additionally, due to the nature of our business and customer base (Canadian utilities, major Industrial firms, etc.) PTI will be expected to report into those organizations on a yearly basis as well.

The attached report will be made available on our website, www.ptitransformers.com, submitted to Public Safety Canada, and updated on a yearly basis.

The vast majority (95+%) of our supply chain is made up of domestic suppliers located in Canada and the United States and is made up of numerous types of companies such as multi-national firms and small and medium enterprises. The rest of our supply chain is located in Europe and generally dictated by customer specifications or are components/materials that are not produced in North America. Our company performed an internal risk assessment and asked our suppliers for information needed for the attached report and questionnaire required to be submitted to Public Safety Canada and there was found to be a very low risk of forced or child labour in our supply chains due to the jurisdictions in which we operate in and buy materials/components from.

PTI Transformers supports the efforts of our government to reduce and eliminate forced and child labour in products being used in and imported to Canada.

If you would like more information regarding Bill S-211, please go to the Public Safety Canada website, the link is provided below:

<https://www.publicsafety.gc.ca/cnt/cntrng-crm/frcd-lbr-cndn-spplly-chns/index-en.aspx>

My Best Regards,

George Jr. Partyka
CEO





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Bill S-211 Report

About PTI

PTI Transformers (formerly Partner Technologies Incorporated) was established in 1989 as a small maintenance and reconditioning shop for oil filled electrical apparatus in Regina, Saskatchewan. Shortly thereafter, PTI started manufacturing single-phase oil filled distribution transformers, and our expertise has since grown to the point of recognition as a leading innovator of transformer technology. PTI Transformers has become Canada's largest 100% Canadian owned transformer manufacturer with a focus on custom engineered solutions that meet and exceed customer requirements.

In late 2015, PTI Transformers acquired the Winnipeg, Manitoba operations of CG Power Systems Canada (formerly operating under Pauwels Canada and Federal Pioneer Ltd.), recognizing the need to expand our product portfolio into medium and large power transformers, and to preserve and repatriate transformer technology to North America.

Our capabilities now range from distribution transformers to power transformers up to 600MVA and 525kV, and include specialty products such as: mobiles, integrated substation solutions, shunt reactors and serve the utility, renewable and commercial/industrial markets.

PTI Transformers was first recognized as one of Canada's Best Managed Companies in 2008 and continues to be recognized at the program's highest level, Platinum Member. Canada's Best Managed Companies is Canada's leading business awards program, and each year PTI goes through a rigorous third-party process that evaluates our management abilities and practices beyond financial performance.

Customers appreciate the opportunity to talk to PTI's helpful staff and tap their knowledge of transformer technology. Our responses are quick and the solutions are innovative. PTI has focused on developing and maintaining long-term relationships with our customers, and providing solutions that meet their needs, rather than providing only what we make.

Mission Statement

To manufacture and service liquid-filled transformers employing innovative and green customized solutions that bring true value and quality to the Customer. We are committed to investing in our shareholders, community and employees through continuous improvement, corporate citizenship, safety, health and environmentally sustainable practices.



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Core Values

Supply products of the highest quality and value at a price that is competitive in the marketplace and support these products in a manner that ensures their long-term value to our customers.

- Grow the company by seeking new, innovative business opportunities that are complementary to the markets we serve.
- Create and maintain a safe and healthy working environment for all of our employees.
- Share the success of our business with our employees.
- Deal with customers, suppliers and employees in a positive, transparent and friendly manner that focuses on the mutual benefit of our relationships.
- Act with absolute integrity in all of our business dealings.

About PTI Products

As described above, PTI manufactures liquid-filled distribution and power transformers and substation solutions. Transformers are designed and manufactured for a specific project or customer and can greatly vary from customer to customer even though ratings and voltages may be the same. In the case of power transformers, these items are generally prototypes and have a specific application. Customers can have dozens of different stock/product codes that are required to best serve their territory. Our transformers are made up of the following materials and components:

- Transformer insulation (thermally upgraded speciality paper and pressboard products)
- Winding conduction (copper or aluminum, wire, strip, or continuously transposed cable, sometimes insulated)
- Electrical steel transformer cores (grain oriented electrical steel or amorphous core)
- Insulating liquid (transformer mineral oil, natural ester or synthetic ester)
- Fabrication steel or transformer tanks
- Transformer components that may include, but are not limited to: bushings, lightning arresters, tap changers/tap switches, current transformers, gauges, and other accessories.

These materials and components are specially made for transformer applications based on industry standards and customer specifications. Raw materials (i.e. steel, copper, aluminum) are not purchased individually for transformer manufacturing. Raw materials are processed into transformer materials and components used in the manufacturing and assembly process.



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Supply Chain

The transformer supply chain is made up of many firms of varying sizes, from small local vendors to multi-national firms. Customers play a large roll in defining components and materials and in many cases, the materials and vendors are specified. This allows the customer to have consistent and standard products in their equipment fleet, stock spares, and ensure some consistency among different transformer suppliers.

Training

All employees at PTI that are responsible for contracting or making purchases are required to be trained on our Forced Labour policy and the system in place to canvass our supply chain partners. These records are kept as part of their employee file.



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	FORCED LABOUR POLICY & PROCEDURES
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PURPOSE

Forced labor is a grave violation of human rights and is strictly prohibited within our organization. This policy outlines our commitment to preventing, identifying, and addressing any instances of forced labor within our operations and supply chain. We are dedicated to upholding international labor standards and ensuring the dignity and well-being of all individuals involved in our activities.

For the purpose of this policy, all terms under the modern slavery definition will be included under forced labour.

SCOPE

All employees of PTI are expected to adhere to this policy while conducting company business. Where applicable, the policy applies to visitors (including contractors) and every effort will be made to notify visitors of the policy prior to or upon arrival at a PTI site.

PTI will ensure that no modern slavery/forced labour is used not only internally but for suppliers for parts of a transformer's final assembly, and over \$10,000 will fit within these requirements.

DEFINITIONS

ABBREVIATION, WORD OR TERM	DEFINITION
<i>Forced Labour</i>	Any work or service that is extracted from an individual under the threat of penalty or coercion, where the individual has not offered themselves voluntarily and is unable to leave the situation freely; includes modern slavery definition.
<i>Modern Slavery</i>	situations where coercion, threats or deception is used to exploit victims and undermine their freedom, and can include: • human trafficking; or • slavery; or • servitude; or • forced labour; or • debt bondage; or • forced marriage; or and • child labour.

POLICY

PTI Transformers respects human rights and is committed to limiting the risk of forced labour within our supply chains and operations. We do not condone or use child or forced labour in any of our operations or premises. It will work to ensure these practices are not present in our operations or supply chain. We expect that all organisations we engage with do the same.

We declare that our workforce is voluntarily and entitled to leave the work whenever they desire. Workers are not required to post a deposit or bond, and salaries are not withheld for any reason.

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FORCED LABOUR POLICY & PROCEDURES



We will follow all laws and regulations regarding employment practices and, if made aware of forced labour practices in its own business or within its supply chain, will resolve the issue in line with the values expressed in this policy. It is expected that suppliers have similar values to us concerning forced labour.

RESPONSIBILITIES & EXPECTATIONS

Executive Management are responsible to:

- Develop and approve the policy and procedures
- Demonstrate the commitment to preventing forced labour
- Engage with suppliers and business partners to communicate expectations regarding compliance to the forced labour policy

Managers/Supervisors are responsible to:

- Communicate the forced labour policy to employees within their department
- Ensure employees receive appropriate training and guidance on preventing forced labour
- Respond promptly to any incidents or allegations of forced labour within their departments and/or suppliers

Employees are responsible to:

- Comply with all aspects of the forced labour policy
- Report any concerns, suspicions, or incidents related to forced labour to executive management
- Exercise due diligence when engaging with suppliers and business partners for any signs of forced labour

Human Resources is responsible to:

- review and revise the policy and procedures as appropriate, with input from stakeholders;
- provide policy interpretation and guidance to departments;
- provide education and skill development training in the administration of the policy;

Confidentiality

PTI Managers/Supervisors are expected to maintain the privacy of employees. Details of incidents shall remain confidential and be shared only with relevant PTI representatives, including senior management and the Human Resources department.

To protect the privacy of employees, Human Resources will hold in confidence, and shall not divulge, any information relating to personal matters, unless expressly authorized by the person making the request, or unless there is a legal requirement to divulge the information.

Personal and personal health information obtained by PTI is protected by *The Freedom of Information and Protection of Privacy Act ("FIPPA")* and *The Personal Health Information Act ("PHIA")*. This section is also subject to any other applicable privacy legislation.



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	FORCED LABOUR POLICY & PROCEDURES
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PROCEDURES

PTI shall not employ any person below the age of sixteen (16) years, or the local minimum employment age. No employee is made to work against his or her will, or subject to corporal punishment, to threat or to coercion of any type in relation to work

Supplier Verification

PTI commits to undertaking a detailed risk assessment to identify which parts of operations and supply chains are most at risk from modern slavery. This procedure pertains to supply partners that meet the following criteria:

- Supply goods that are a part of a transformer's final assembly
- Annual purchases of \$10,000 or more

Information for each supplier must be compiled annually by May 15th to be included in PTI's annual report filed to Public Safety Canada and posted on our website. This information will be pulled by the Purchasing Department, and all suppliers that meet the criteria above will provide PTI with a Bill S-211 Declaration Letter, PTI Transformers Bill S-211 Supply Chain Survey, or an independent report for to demonstrate they meet Bill S-211 requirements.

TRAINING & COMMUNICATION

All staff will undertake an awareness programme on forced labour, which covers:

- the various forms of forced labour and how people can be held and exploited; and
- the scope of the issue and how it affects our organisation; and
- how personnel can identify the signs of forced labour practices; and
- responsibilities of workers should they suspect forced labour.

Required employees (i.e., Purchasing, Operations, Human Resources, Quality Assurance) will receive training on the Forced Labour Policy and Work Standard.

FORMS & SUPPORTING DOCUMENTS

FORM #	NAME
	Bill S-21 Supplier Compliance Work Standard
	Bill S-21 Declaration Letter
	Bill S-211 Letter
	PTI Transformers Bill S-211 Supply Chain Survey

RESOURCES

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**FORCED LABOUR
POLICY & PROCEDURES**



APPROVAL LIST

RESPONSIBILITY CENTRE:	DOCUMENT # ISSUED BY QA MANAGER:	ACCEPTED FOR OPERATIONS:
Human Resources	Lemuel Limosnero <i>Original signed</i> Date August 19, 2024	Mervin Turnbull <i>Original signed</i> Date August 19, 2024
ACCEPTED FOR HR (REGINA):	APPROVED BY VP, CQSR:	APPROVED BY CEO:
Date	Jamie Carlson <i>Original signed</i> Date August 19, 2024	George Partyka Jr. <i>Original signed</i> Date August 19, 2024

REVISION HISTORY

REVISION #	REVISED BY	DATE	DESCRIPTION OF REVISION
0	Jamie Carlson	Aug 19, 2024	Initial Release or amendment

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Forced Labour in Canada Questionnaire

<i>* This questionnaire, is the required questionnaire to complete and submit to the Government of Canada.</i>	
<i>This report is for which of the following?</i>	Entity
<i>Legal name of reporting entity or government institution:</i>	PTI Transformers Inc.
<i>Financial reporting year (Start Date):</i>	October 1, 2022
<i>Financial reporting year (End Date):</i>	September 30, 2023
<i>Is this a joint report?</i>	Yes
<i>If yes, identify the legal name of each entity covered by this report.</i>	PTI Transformers Inc. PTI Transformers LP
<i>Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?</i>	No

<i>Which of the following categorizations applies to the entity?</i>	
☒	Has a place of business in Canada
☒	Does business in Canada
☒	Has assets in Canada
☒	Has at least \$20 million in assets for at least one of its two most recent financial years
☒	Has generated at least \$40 million in revenue for at least one of its two most recent financial years
☒	Employs an average of at least 250 employees for at least one of its two most recent financial years

<i>Which of the following sectors or industries does the entity operate in? Select all that apply.</i>	
☒	Manufacturing

<i>Which of the following sectors or industries does the entity operate in? Select all that apply.</i>	
☒	Canada

<i>In which province or territory is the entity is headquartered or principally located?</i>	
☒	Saskatchewan

<i>What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)</i>	
☐	Mapping activities
☐	Mapping supply chains
☒	Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
☐	Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
☒	Developing and implementing an action plan for addressing forced labour and/or child labour
☒	Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
☐	Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
☒	Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
☐	Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour



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	Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
	Developing and implementing child protection policies and processes
	Developing and implementing anti-forced labour and/or -child labour contractual clauses
	Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
X	Auditing suppliers
X	Monitoring suppliers
	Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
	Developing and implementing grievance mechanisms
X	Developing and implementing training and awareness materials on forced labour and/or child labour
	Developing and implementing procedures to track performance in addressing forced labour and/or child labour
X	Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
	Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
	Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
	Information not available for this reporting period
	Other, please specify:

Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

PTI Transformers purchases the majority (95+%) of our materials from suppliers located in Canada and the United States. Many of these supply partners are required to report on this initiative already. Our other supply chain partners have been asked to report to PTI any known forced labour within their products supplied to PTI, fill out a survey which mirrors this questionnaire, and/or sign a declaration stating there is no forced labour in their products supplied to PTI by someone who is able to legally bound the organization. In general, as our work and supply resides in Canada and the U.S., our risk assessment in our supply chain has indicated a very low risk of forced labour in our supply chains.

Which of the following accurately describes the entity's structure? (Required)

X	Corporation
	Trust
	Partnership
	Other unincorporated organization

Which of the following accurately describes the entity's activities? Select all that apply. (Required)

	Producing goods (including manufacturing, extracting, growing and processing)
X	In Canada
X	Outside Canada
	Selling goods
X	In Canada
X	Outside Canada
	Distributing goods
	In Canada
	Outside Canada
X	Importing into Canada goods produced outside Canada
	Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada



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Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit)

PTI Transformers manufactures distribution and power transformers in Saskatchewan and Manitoba. Our supply chain is considered domestic as the majority of the materials used to manufacture transformers is procured from suppliers in Canada and the United States. The materials that are purchased are specifically produced for transformer manufacturing. Our customers also dictate our supply chains by requiring products from specific suppliers to ensure consistency within their fleet, ensure spares are readily available and may also exclude products from certain countries (i.e. Russia, China).

Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

☒ Yes

☐ No

If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

☒ Embedding responsible business conduct into policies and management systems

☐ Identifying and assessing adverse impacts in operations, supply chains and business relationships

☒ Ceasing, preventing or mitigating adverse impacts

☐ Tracking implementation and results

☐ Communicating how impacts are addressed

☐ Providing for or cooperating in remediation when appropriate

Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

As a Canadian company, the laws in place domestically do not allow for any forced or child labour. Additionally, as mentioned above, our company has performed a risk assessment and canvassed our supply chain regarding forced and child labour in their supply chains. The vast majority (99%+) of our supply chain is located in Canada, the U.S., and Europe (i.e. Germany, Switzerland, France, Sweden, Italy) where these same laws and regulations are in place regarding forced and child labour.

Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

☒ Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

☐ Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

☐ No, we have not started the process of identifying risks.

If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

☐ The sector or industry it operates in

☐ The types of products it produces, purchases or distributes

☐ The locations of its activities, operations or factories

☐ The types of products it sources

☐ The raw materials or commodities used in its supply chains

☐ Tier one (direct) suppliers

☐ Tier two suppliers

☐ Tier three suppliers

☐ Suppliers further down the supply chain than tier three

☐ The use of outsourced, contracted or subcontracted labour

☐ The use of migrant labour

☐ The use of forced labour



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	The use of child labour
X	None of the above
	Other, please specify

Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

	Agriculture, forestry, fishing and hunting
	Mining, quarrying, and oil and gas extraction
	Utilities
	Construction
	Manufacturing
	Wholesale trade
	Retail trade
	Transportation and warehousing
	Information and cultural industries
	Finance and insurance
	Real estate and rental and leasing
	Professional, scientific and technical services
	Management of companies and enterprises
	Administrative and support, waste management and remediation services
	Educational services
	Health care and social assistance
	Arts, entertainment and recreation
	Accommodation and food services
	Other services (except public administration)
	Public administration
X	None of the above
	Other, please specify

Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

During our internal risk assessment, we did not find any reasonable risks of child or forced labour in our supply chains.

Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

	Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
	Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
	No, we have not taken any remediation measures.
X	Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

If yes, which remediation measures has the entity taken? Select all that apply. (Required)

	Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
	Compensation for victims of forced labour or child labour and/or their families
	Actions to prevent forced labour or child labour and associated harms from reoccurring
	Grievance mechanisms
	Formal apologies



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	Other, please specify.
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<i>Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).</i> Not applicable.	
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<i>Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)</i>	
	Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
	Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
	No, we have not taken any remediation measures.
X	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

<i>Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit).</i> Not applicable	
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<i>Does the entity currently provide training to employees on forced labour and/or child labour? (Required)</i>	
X	Yes
	No

<i>If yes, is the training mandatory? (Required)</i>	
	Yes, the training is mandatory for all employees.
X	✓ Yes, the training is mandatory for employees making contracting or purchasing decisions.
	Yes, the training is mandatory for some employees.
	No, the training is voluntary.

<i>Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).</i>	
Individuals working at PTI that make contracting or purchasing decisions are required to take training related to forced and child labour. This includes internal policy review and the system in place to canvass our supply chain to obtain information related to this questionnaire and our company's report. This information is logged in their employee file.	

<i>Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)</i>	
	Yes
X	No

<i>If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)</i>	
	Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
	Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
	Partnering with an external organization to conduct an independent review or audit of the organization's actions
	Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators
	Other, please specify.



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<i>Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit). Not applicable.</i>
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