Pidherney's
DRIVEN TO EXCEL FROM START TO FINISH

Forced Labor Report

Business # 103785325RT0001

Pidherneys is a corporation solely owned by the Pidherney family. It has been in business for sixty years and employed thousands during that period.

Pidherneys builds roads, roundabouts, landfill cells and capping, underground sewer and water, and oilfield ponds and leases. Pidherneys has always been and will continue to be an equal opportunity employer. Hiring and working with all races, religious beliefs, colors, physical disability, mental disability, ages, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression, and sexual orientation.

It also respects and complies with all laws, regulations, and legislation regarding forced or child labor instituted by Federal and Provincial governments.

In the Heavy construction and engineering industry, we work with Alberta municipalities, cities, oil companies, and landfills. By working with these entities, we understand that their work follows all laws and legislation in Canada. Reducing the probability of forced or child labor offenses.

Also, the products we order to complete our jobs are sourced from Canada and the USA. 98% of our work involves moving dirt and aggregate material sourced in Alberta. The supply chains used are all Canadian businesses that must adhere to the laws, regulations, and legislation instituted by our governments.

Pidherneys has implemented two policies to ensure that forced or child labor is not used; products found to be associated with these practices are identified, reported, and ensured that they are no longer used, aiding in stopping the use of forced or child labor. All employees must review all policies annually to ensure compliance with the law and company procedures.

None of our supply chains are at risk of using forced or child labor.

Clint Pidherney
CEO

Signature: _____
Date: February 7, 2025

FAIR LABOR POLICY

Pidherneys bases this protocol on industry best practice guidance from the United National Global Compact (UNGC) principles, ISO 26000 Guidance on Social Responsibility, and guidance from the Organization for Economic Co-Operation and Development. As well as the Canadian and provincial labor laws. We encouraged Pidherney employees, subcontractors, and all companies working with Pidherney to review the industry's best practice documents, as well as any applicable regional laws or legislation surrounding your company, approach, and/or requirements for addressing fair labor practices in your business operation and supply chains.

Pidherneys will ensure that all management members fully understand forced labor. Forced or compulsory labor is any work or service involuntarily provided by any person under threat of penalty. Forced labor can take several forms. Situations of forced labor are generally characterized by a lack of consent to work (the route into forced labor) and the menace of a penalty (the means of keeping someone in forced labor).

The following are forms of forced labor:
• Slavery
• Bonded labor or debt bondage
• Child labor
• Physical abduction or kidnapping
• Sale of a person into the ownership of another
• Physical confinement in the work location (in prison or in private detention)
• The work or service of prisoners
• Labor for development purposes
• Work required to punish opinion or expression of views
• Exploitative practices such as forced overtime
• The lodging of deposits (financial or personal documents) for employment
• Physical or psychological (including sexual) violence
• Full or partial restrictions on freedom of movement
• Withholding and non-payment of wages
• Deprivation of food, shelter, or other necessities
• Deception or false promises
• Induced indebtedness
• Threats to denounce workers in an irregular situation to the authorities

Pidherneys will ensure that forced labor in all forms is prohibited in all areas of Pidherneys operations. This includes ensuring suppliers and subcontractors use fair labor practices and eliminating any risks of forced labor conditions. Mechanisms for this include supplier or subcontractor evaluations, site visits, etc.

Fair Labor Policy

Discrimination

Pidherneys eliminates discrimination in the workplace and follows our violence and harassment program based on the Canadian Federal and Provincial laws and leglislation. Pidherneys does not discriminate in employment or occupation, treating all people the same and not favoring anyone based on characteristics related to their merit or the inherent job requirements, such as ethnicity, age, race, etc. Discrimination can arise in various work-related activities, including access to employment, particular occupations, promotions, training, and vocational guidance. Pidherneys will not allow any such discrimination.

Training

All employees have equal and non-discriminatory access to skills development training on the job, apprenticeships, and career advancement. Adequate working conditions are ensured for all employees, including wages, compensation, working times, rest periods, holidays, disciplinary and dismissal practices, maternity leave, and welfare, such as safe drinking water, sanitation, and access to medical services. Pidherneys adheres to all Canadian and Provincial labor regulations and laws in all work areas.

Work Conditions

Pidherney’s work sites and offices are supplied with the highest degree of respect and care for our people, subcontractors, and the public. Pidherneys provides accessible clean water, buildings, worksites, washrooms, regular hours of work, wages, weekly rest, holidays, health and safety, maternity leave, and the ability to combine work with family responsibilities. We believe that a work-family-life balance is the key to Pidherney's success.

February 1st, 2024
Date

Clint Pidherney, Vice President

Child Labor Law Policy

Pidherney's Inc. Child Labor Law is based on international labor conventions ILO 138 and 182 and Canada's Bill S-221, passed on May 11, 2023. This policy reflects Pidherney's commitment to ensuring that all employees are above the local minimum employment age, mandatory school age, or at least 14 years old, whichever is higher.

Principal

Pidherney's Inc. does not allow child labor. Child labor is defined as work that a child is legally prohibited from doing or work that is likely to be harmful to the child's physical, mental, spiritual, moral, or social development or that interferes with the child's education.

Pidherney's Inc. supports the ILO conventions specifying.

- All actions concerning the child shall take full account of his or her best interests.
- The right of the child to be protected from economic exploitation, from performing any work that is likely to be hazardous or interferes with the child's education, or is harmful to a child's health or physical, mental, spiritual, moral, or social development.

Implementation

Pidherney's Inc. will take the appropriate measures to ensure no child labor occurs within the organization, including all subcontractors.

This includes but is not limited to;

Recruitment policies verifying age documentation of employees' identification issuing and daily verification. Dissemination of contracts, policies, and available documentation, such as signage regarding child labor laws and company position on child labor.

Young Workers

Pidherney's Inc. supports the legal employment of young workers in non-hazardous work, as per the ILO Convention. 138

Young workers of legal age have, until the age of 18, the right to be protected from any type of employment or work deemed hazardous and likely to jeopardize the health, safety, or morality of this worker, including nighttime work and extended working shifts. Limits on working hours and overtime are set in accordance with local law and with special consideration of young workers' ages.

Registration of Labor Force

If child labor is found within the workforce, Pidherney's Inc. will seek a resolution in the child's best interests.

In conjunction with Child Labor Free and the worker representatives, Pidherney's Inc. will work to develop a responsible solution, including a corrective action plan to meet the needs of the

child, including ensuring they are not disadvantaged, are safe, and are not discriminated against because of their age.

These include but are not limited too;

- Ensuring the child discontinues work.
- Ensuring the child is reunited with family and/or relatives/community if this is a safe option.
- The development and implementation of a remediation plan considering the needs and desires of the child and their family.
- Ensuring the child has monetary provisions equal to their current wage or legal minimum requirements for employment for the time worked.
- Explanation of the legal requirements and restrictions on working ages of children and assurance, if they wish, they will be reemployed when they reach age.
- No child working at Pidherney's Inc. will be disrespected, discriminated against, or threatened during the process of remediation.

February 1st, 2024
Date



Clint Pidherney, CEO