

Guy J. Bailey Ltd. • Shoreline Aggregates Inc. 325 Highway 410 PO Box 184 Baie Verte, NL A0K-1B0 T: (709) 532-4642 F: (709) 532-4643



Fighting Against Child Labour and Child Labour in the Supply Chain Report

<u>Introduction</u> This Modern Slavery Statement is issued by Shoreline Aggregates Inc. and Guy J. Bailey Limited (collectively referred to as "the Companies") pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). It outlines the actions taken during the 2023 fiscal year to prevent, identify, assess, and mitigate risks of modern slavery, including forced labour and child labour, within our operations and supply chains.

Entity's Structure and Activities Shoreline Aggregates Inc. and Guy J. Bailey Limited are incorporated entities based in Newfoundland and Labrador, Canada. Shoreline operates large scale crushing operations and exports aggregate products internationally from Port Rousse, NL. Guy J. Bailey Limited is engaged in diverse construction projects across Newfoundland and Labrador and supports Shoreline by providing essential services such as load, haul, and dump operations. Together, the Companies employ 115 people.

<u>Supply Chain Overview</u> The supply chain of the Companies predominantly involves suppliers from Canada and the United States. In 2023, our top 10 suppliers constituted 88% of our total supply chain expenditures. These suppliers are primarily involved in providing:

- Fuel and energy
- Maintenance, repair operations and production consumables
- Contracted equipment and labour services
- Transportation and logistics
- Drilling and blasting
- Mobile and stationary equipment for crushing, ship loading, and quarrying

<u>Due Diligence and Risk Assessment</u> To address risks associated with modern slavery, the Companies have implemented a due diligence framework that includes:

Internal Supplier Assessments: Assessments of our top suppliers for risks related to human rights abuses, including forced and child labour. The internal assessment included reviewing geographical mapping of our suppliers'. Our findings showed that in 2023, 37% of our total Tier 1 spending was in Canada and 63% in the United States. In our assessment, we noted that none of our Tier 1 supplier spending was from Countries that globalmarch.org list as top countries vulnerable to economic and labour exploitation. Additionally, our team reviewed World Visions reports on the top risky products at risk for child Labour, out of our top 10 suppliers, no purchases fell into those categories.

Risk Management For the top three spending categories identified as having the highest expenditure but low risk from a Tier 1 perspective, the following specific actions have been taken:

 Transportation and Logistics: Implementation of a monitoring system to track the labour conditions of those involved in our logistics operations, especially focusing on third-party logistics providers.

- **Contracted Equipment and Labour Services:** Rigorous vetting processes for labour providers, including verifying the labour practices of subcontractors and agencies.
- Fuel and Energy: Engaging with suppliers to ensure compliance with environmental and social governance (ESG) criteria, which include Labour rights protections.

Policies

Duty of Care

Shoreline Aggregates Inc and Guy J. Bailey Limited closely abides by the Newfoundland and Labrador Labour Standards Act, the Canadian Human Rights, Newfoundland and Labrador Occupational Health and Safety Act, the Newfoundland and Labrador Highways Act and other relevant legislation.

Modern Slavery and Child Labour Policy

Guy J. Bailey Ltd. and Shoreline Aggregates Inc. strictly prohibit the use of forced labour and child labour in any part of our operations or supply chains. We are committed to implementing and enforcing systems and controls to ensure that our products are free from exploitation and comply with national and international laws and standards.

Human Rights Commitment In line with best practices and to align with industry leaders and we are committed to developing a Human Rights Statement that articulates our stance and measures for upholding human rights within our operations and extended supply chain.

Actions Taken Specific actions taken during the year to mitigate modern slavery include:

 Assessments of our top suppliers for risks related to human rights abuses, including forced and child labour. This includes reviewing suppliers by source Countries, products supplied and human rights statements and their compliance with labour laws.

Effectiveness and Monitoring

 At this time no actions have been taken to assess their effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains.

Future Commitments Moving forward, we will continue to refine our approach to tackling modern slavery by:

- Implementing a mandatory computer-based training programs for directors, managers and procurement employees on modern slavery risks and mitigation strategies in the procurement process.
- Develop and distribute a supplier code of conduct that includes stringent labour rights
 protections and continually monitor the effectiveness of supplier compliance rates with our code
 of conduct.
- Completing risk assessments further down our supply chain.
- · Extending our human rights training programs

Conclusion Shoreline Aggregates Inc. and Guy J. Bailey Limited are dedicated to continually enhancing our practices to combat modern slavery in all forms within our business operations and supply chain.

Approval and Attention of the report

The contents of this report were approved pursuant to paragraph 11(4)(b)(i) 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.

I have the authority to bind Shoreline Aggregates Inc. and Guy J. Bailey Limited

Full Name: Scott Bailey

Title: President and CEO of Shoreline Aggregates Inc and Guy J. Bailey Limited

Date: May 31, 2024