



Smith + Andersen

1100 – 100 Sheppard Ave. East, Toronto ON, M2N 6N5

416 487 8151 f 416 487 9104 smithandandersen.com

FORCED LABOUR AND CHILD LABOUR REPORT

SMITH AND ANDERSEN CONSULTING ENGINEERING

DATE: May 30, 2024

INTRODUCTION

Smith and Andersen Consulting Engineering (SACE) is a general partnership formed under the laws of the Province of Ontario, which carries on business under the registered business name and trademark, Smith + Andersen. SACE provides mechanical and electrical engineering services to the Canadian market, in addition to specialty consulting services in sustainability, lighting design, integrated systems, and security, among others.

Due to the nature of its business the principals and team leaders at SACE are required to comply with the rules and regulations under their licences, as prescribed by the provincial professional engineering associations. SACE operates in compliance with applicable laws, rules and regulations

OWNERSHIP INFORMATION

SACE is a general partnership consisting of XXX partner corporations:

- The Smith + Andersen Group
- D.R. Larson Holdings Inc.
- L.P. Baker Holdings Inc.
- 14B Inc.
- B.H. Atlin Holdings Inc.
- James Back Holdings Inc.
- Antonio Spina Holdings Inc.
- SW Graham Holdings Inc.
- Bertha Lai Associates Inc.

All corporations are Canadian and are in the business of providing engineering services.

BUSINESS

SACE is a supplier of the engineering consulting services to the Canadian construction industry, for new build commercial and residential construction and renovation or retrofit projects. SACE provides services mainly through its personnel headquartered in Toronto.

For those projects on which SACE retains sub-consultants or other suppliers, SACE will conduct due diligence to confirm that the relevant entity will be providing the services through its staff in Canada. Such efforts include reviewing prior projects and/or obtaining references. For the most part, the entities retained by SACE operate within regulated industries and are required to comply with professional requirements.

SACE retains its subconsultants and suppliers under written agreements that incorporate the project policies regarding forced labour and child labour.

SUPPLY CHAIN

SACE's supply chain is limited to those supplies and products required to support office operations. For clarity, SACE does not source or supply products or equipment to the construction industry. For those goods sourced in support of SACE's operations, including software programs, office equipment and supplies, SACE works only with qualified retailers. SACE does not source any goods or products from factories directly and does not use outsourced labour in any capacity.

SACE monitors its supply chain to ensure that there is no right of modern slavery.

POLICIES AND STANDARDS

SACE has implemented an Anti-Slavery Policy for employees through HR. SACE is in the process of developing HR training modules, which is anticipated to include training for existing employees and new hires. SACE is examining implementing a framework for submitting questions or concerns, possibly by way of an online tool. To the extent that SACE becomes aware of any risk of forced or child labour in its operations, appropriate initiatives will be introduced. As an organization, SACE recognizes the importance of increasing awareness of the issues surrounding forced and child labour and adopting human rights best practices.

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Simon Aspinwall, P.Eng.
Senior Principal