



A division of Spar Roofing & Metal Supplies Limited

Canadian Modern Slavery Act – Report (Fiscal Year 2023)

Introduction

This report is prepared in accordance with the obligations under Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Modern Slavery Act”).

SPAR-Marathon Roofing Supplies is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. We recognize the responsibility to take a robust approach to slavery and human trafficking. The proper steps are in place to vet high risk suppliers and to obtain documentation to ensure there is no slavery or human trafficking in our supply chains.

Structure, Activities, & Supply Chain

SPAR-Marathon Roofing Supplies is a manufacturer of roofing equipment/metal products, and a distributor of complete roofing supplies.

In operation for over 30 years, we currently sell to the public and professional roofing contractors through our 11 service centres in the provinces of Alberta, Manitoba, and Ontario.

As a wholesale distributor all purchasing/procurement is centralized to ensure standards and efficiencies, our primary suppliers are large often publicly traded corporations who operate with high standards and enact various policies to protect against any forced labour or child labour. In total, over 99% of our supply chain is sourced within North America and held to North American laws and standards regarding forced labour/child labour.

Policies and Due Diligence

We identify a supplier as high risk when they are either operating in/or sourcing and importing product from outside North America. Our policy is to do the following steps;

- Engage in dialogue with the supplier – and obtain documentation or certificates that the supplier does not engage or employ any practices of forced labour/child labour.
- If we are not satisfied and cannot be confident that a supplier is free from any child labour or forced labour, we make the appropriate measures to remove this supplier and source materials elsewhere.

During the year ended December 31, 2023 – our organization did not identify any instances of forced labour or child labour within the operations of the business or our supply chains.

Forced or Child Labor Risks in Our Business

SPAR-Marathon Roofing Supplies is at very low risk. Most of our supply chain is sourced within North America and held to very high rigorous standards.

Our current suppliers who are operating/source outside North America in countries that potentially have issues we have identified. We then ensure to gain necessary reassurance i.e. certificates, documentation, etc. – that they are compliant and do not employ forced labour or child labour in their businesses.

In addition, our industry is very transparent about manufacturing locations and plants. Therefore, if we decide to introduce new products to sell, we are confident that they come from good sources. It is our company policy that no new product can be introduced without top level manager approval.

Remediation Measures

In the case that a supplier cannot satisfy us, or it is found that they employ forced labour or child labour it is *SPAR-Marathon Roofing Supplies* policy for no tolerance, and we would immediately move away from buying from this supplier.

In our industry the vast majority of products are commodity type products, therefore it is easy to find other suppliers who would comply.

Training Provided

SPAR-Marathon Roofing Supplies is committed to health & safety, human rights, and workplace training. Likewise, all procurement/purchasing officers have been trained on this policy.

Assessing Effectiveness

We are confident our plan effectively removes our supply chain from being complicit or involved in any “modern slavery” concerns. *SPAR-Marathon Roofing Supplies* is 100% against any human trafficking, slavery, or forced/child labour. Management will review annually our plan and remain compliant with relevant laws, in order to fulfill our commitment as a responsible organization maintaining a supply chain and business free from “modern slavery”.

Approval and Attestation

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 entity or 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.

Craig Glynn

President

May 30th, 2024



I have the authority to bind *Spar Roofing & Metal Supplies Limited*.