Report Pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, C.9 For the Reporting Year January 1, 2023, to December 31, 2023

This Report is filed on behalf of Sterling Ridge Group Inc. which controls the following entities:

- Sterling Ridge Infrastructure Inc.
- Sterling Ridge General Contracting Inc.
- Sterling Ridge Architectural Systems Inc.
- Sterling Ridge Utilities Inc.
- Smith Contracting Inc.
- Sterling Ridge Logistics Inc.
- Erie Sand and Gravel Limited
- Global Electric and Lighting Inc.

Sterling Ridge Group Inc. is the parent Company of Sterling Ridge Infrastructure Inc., Sterling Ridge General Contracting Inc., Sterling Ridge Architectural Systems Inc., Smith Contracting Inc., Sterling Ridge Logistics Inc., Erie Sand and Gravel Limited and Global Electric Lighting Inc. Sterling Ridge Group Inc. does not itself carry on any active business. It owns the shares in the listed Companies. All the following Companies are Divisions of Sterling Ridge Group Inc. Each company carries on succinct business activities and has a chain of command organizational structure with a common Executive Team overseeing all the Divisions.

<u>Sterling Ridge Infrastructure Inc.</u> (Infrastructure) is an Ontario corporation performing construction related activities including infrastructure, power, and industrial work for the most part in Ontario but always in Canada. Most of its' employees are Unionized. Those that are not Unionized are Canadian Citizens or have the right to work in Canada. Sterling Ridge Infrastructure employee numbers average 190.

- Infrastructure predominantly performs Heavy Civil Infrastructure Projects, sewer and watermain and servicing work, earthworks, excavation, road and bridge construction and rehabilitation. All pipe comes from Quebec where it is manufactured. Labour/Operators are Unionized.
- Power focusses on large projects such as projects for Hydro One. For these projects, we create the duct banks using our Labour which is Unionized, and Canadian made material or material supplied by Hydro One. Labourers/Operators are Unionized.
- Industrial work focusses on retooling of Plants/Factories. The workforce is Unionized, predominantly Electricians. In most instances products are supplied for installation. Where

we are required to source, we have reached out to major suppliers who are all Ontario based to confirm that goods supplied are not the product of forced/child labour.

Sterling Ridge Architectural Systems Inc. is a corporation incorporated under the laws of Ontario. All employees are Canadian citizens or have the right to work in Canada. Work is carried on in Ontario. It specializes in building envelope systems, Architectural Systems, manufactures and installs Glazing Systems, Aluminum Composite Wall Panels, Prefinished Metal Siding and Composite Wall Cladding. Major suppliers of inputs are all from Ontario. We have reached out to Major Suppliers to confirm that goods supplied comply with the legislation requirement. Sterling Ridge Architectural averages 30 employees.

Sterling Ridge General Contracting Inc. is a General Contractor which generally oversees subcontractors performing ICI work, Lump Sum Bid, Time and Material and Construction Management Contracts in Ontario and predominantly in Essex County. All employees working for General Contracting are Canadian. All subcontractors are vetted and are obligated to follow Sterling Ridge Group Inc. Policies and Procedures. Many workers are Unionized. General Contracting averages 30 employees.

<u>Sterling Ridge Utilities Inc.</u> is an Ontario Company that participates in water and sewer infrastructure, dry utilities, open excavation, directional drilling pipe installation, and underground utilities surveying. It carries on business in Ontario. Pipe comes from Quebec and is manufactured in Quebec. Equipment is purchased from Ontario providers and is North American made. Most employees are unionized. All other employees are Canadian or are authorized to work in Canada. Sterling Ridge Utilities averages 32 employees.

<u>Erie Sand and Gravel Limited</u> is an Ontario corporation that mines aggregates such as sand, clear Granular and Round Aggregates, performs Extraction, and supplies aggregate. Erie owns and/or controls all properties in Essex County with Granular B sand reserves. The employees are Canadian or eligible to work in Canada. Equipment is purchased from Ontario dealers. Employee numbers average 55-60.

<u>Smith Contracting Inc.</u> is an Ontario company that claims and recycles aggregate material. The aggregate material comes from locations in Essex County, Ontario. The Equipment is purchased/Leased from large Ontario dealers. The employees are Operating Engineers and member of the Union. Smith sells to Companies in and around Essex County. Smith Contracting has 4 employees.

<u>Sterling Ridge Logistics Inc.</u> is an Ontario company that provides trucking and logistic services for aggregate transportation, heavy equipment transportation, and General Third-Party Trucking Services, for the most part in and around Essex County but always in Ontario. Equipment is purchased/leased from Ontario Dealers. Aggregate trucked is mined from Erie Sand and Gravel or third parties. Employees are Canadian Citizens or eligible to work in Canada. Sterling Ridge Logistics averages 27 Drivers.

Global Electric and Lighting Inc. is an Ontario Corporation carrying on electrical works and maintenance in the GTA. Its employees are unionized. Equipment/parts come from Ontario providers. Global electric has 4 employees.

Policies, Procedures and Due Diligence

Attached is our Policy on Forced and Child Labour, our Supplier Code of Conduct included in our Purchase Orders and the Supplier Declaration forwarded to major Suppliers.

Given that our work is in Canada, that most of our employees are Unionized, and products purchased and used are Canadian made or purchased from large Canadian businesses who themselves must ward against supply chains which carry a risk of child/forced labour there is little risk that parts of our business and supply chains carry a risk of forced labour or child labour. The businesses we engage in are also not traditional businesses which carry an increased risk of child or forced labour such as clothing manufacturing or farming.

We have not identified any forced labour or child labour in our supply chain, so we have not taken any measures to remediate forced labour or child labour.

We have not identified any measure resulting in loss of income to the most vulnerable families, so we have not taken any steps to ameliorate this loss.

Training provided includes training to those who oversee the Divisions and purchasing about forced and child labour law and our Policies as well as the executive Team. Training is approximately one hour in length. Employees receiving/received the training number 15.

We have not undertaken assessment of the effectiveness of these actions in in ensuring that forced labour and child labour are not being used in our business and supply chains.

This Report is approved pursuant to subparagraph (4)(a) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c.9 this 28th day of May 2024, City of Windsor, County of Essex, Province of Ontario.

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 contained in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Sterling Ridge Group Inc.

J. Randall Koop, President

(I have authority to bind the Company)