

Structa Wire Corp

Report on Fighting Against Forced Labour and Child Labour in the Supply Chains Act.

Introduction

This report summarizes the steps Structa Wire Corp has taken pursuant to Section 11 of the Canadian Fighting Against Forced labour and Child Labour in Supply Chains Act. The report has been prepared by Structa Wire management and covers the fiscal year ending March 31st 2024.

Structure, Activities and Supply Chains

Structure:

Structa Wire Corp is located in Vancouver, BC, incorporated under the Canadian Business Corporations Act, registered in British Columbia and operating as a wholly owned subsidiary of Clark Dietrich Building Systems headquartered in West Chester, Ohio, USA.

Activities:

Structa Wire Corp has 47 employees and is a manufacturer and marketer of a leading brand of wire reinforcing materials used in the construction of stucco clad walls and ceilings. All finished products are manufactured in Vancouver and sold widely throughout the United States and Western Canada.

Supply Chains:

Structa Wire works within a supply chain of material suppliers and service providers predominately located in Canada and in the U.S. Raw materials are also procured from Asia and a few parts suppliers are located in Europe. The main materials procured include galvanized wire, galvanized sheet metal, kraft paper, packaging materials, parts and equipment.

Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

During the fiscal year ending March 31st 2024 Structa wire has taken the step of mapping its supply chain to identify suppliers in areas of higher risk of forced and child labour. Suppliers identified in these areas will be made aware of the Canadian “Fighting Against Forced labour and Child Labour in the Supply Chains Act”.

Policies and Due Diligence Processes

At Structa Wire respect for human rights is fundamental to our purpose and to our commitment to ethical business conduct.

We recognize governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions. Structa Wire is committed to upholding all the relevant national laws and international guidelines to prevent and reduce any incidence of forced labour and child labour within its operation and supply chain.

Code of Conduct:

Integral to the stated purpose and values of Structa Wire is the pursuit to “DO THE RIGHT THING – DO THINGS RIGHT” Our pursuit of excellence is demonstrated by a commitment to go the extra mile in our efforts. We treat our customers, employees, investors, and suppliers, as they would like to be treated. How we do our jobs and how we treat all those with whom we interact are as important as the results we achieve.

Consistent with this guiding principle we:

- Prohibit forced labor, child labor, and any form of discrimination.
- Work to establish and maintain safe and healthy working conditions at the highest level in our industry.
- Value diversity and leverage differences as a business strategy.
- Seek to compensate employees competitively and operate in compliance with applicable wage, work hours, overtime, and benefits laws.
- Respect the principles of freedom of movement, freedom of association and collective bargaining.

Whistleblower Policy:

The company maintains channels to communicate and submit a report at any time having to do with any type of unfair activity be it unsafe, harmful and/or illegal activity without fear of any repercussions. Employee concerns and complaints will be kept confidential by management to the fullest extent possible while a review process is being conducted.

Forced Labour and Child Labour Risks

The operational activities of Structa Wire in Canada pose a low risk of forced or child labour as Structa Wire meets or exceeds all applicable rules of employment in our jurisdiction. However, we recognize that in our present supply chain some companies whom we have a relationship with are located in other parts of the world where employment regulations may pose a risk of forced and child labour. In an initial mapping exercise, the company is developing a risk assessment to qualify the level of risk given the location and industry type. This knowledge will aid the company in guiding the efforts for taking action to investigate suppliers' activities and communicate to suppliers the need for their commitment to policies that prevent the risks of forced or child labour.

Remediation:

For the reporting period Structa Wire has not found any incidence of forced labour or child labour within the supply chain and therefore no measures of remediation were undertaken.

Employee Training and Communication:

Structa Wire communicates our expectations through training opportunities and educational modules on our company intranet. Employees participate in live and online scenario-based training to illustrate ethical decision-making in daily business activities. Posters highlighting key messages from our statement of Purpose and Values and Cardinal Rules are posted in manufacturing locations and offices areas.

Effectiveness Assessment:

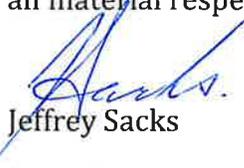
Currently we do not have a review program to assess the effectiveness of our actions in preventing and reducing risks of forced labour and child labour in our activities and supply chains.

Next Steps:

- Continue building due diligence capabilities to proactively identify risks where impacts on people are most severe across our supply chain.
- Establishing a Supplier Code of Conduct to convey to our suppliers the expectations and standards of compliance to prevent and reduce the risks of forced and child labour.
- Increasing employee awareness of our human rights strategy
- Integrating expectations into standard business processes

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.



Jeffrey Sacks

President

May 29th 2024

I have the authority to bind Structa Wire Corp