



Forced Labour in Supply Chains Annual Report

Reporting Entity's Legal Name: Forma Steel Ltd and Structural Truss Ltd

Financial Reporting Year: January 1 – December 31, 2023

Business Number, Forma Steel Ltd: 887805414 RC001

Business Number, Structural Truss Ltd: 887805612 RC001

Joint Report

Entity Categorization:

Structural Truss Ltd: Manufacturer of wood building and construction products, producing, selling and distributing goods in Canada and importing into Canada goods produced outside Canada

Forma Steel Ltd: Manufacturer of steel building and construction products, producing, selling and distributing goods in Canada and importing into Canada goods produced outside Canada

Sector/Industry:

Structural Truss Ltd: Private Sector, Manufacturing Industry

Forma Steel Ltd: Private Sector, Manufacturing Industry

Location:

Structural Truss Ltd: 443 12th Street, Fort MacLeod, AB T0L 0Z0

Forma Steel Ltd: 443 12th Street, Fort MacLeod, AB T0L 0Z0

Executive Summary:

This report aims to outline the measures undertaken by Structural Truss Ltd and Forma Steel Ltd to ensure compliance with Canadian forced labour requirements. In light of increasing global concerns regarding forced labour practices, it is imperative for companies to demonstrate their commitment to ethical sourcing and human rights. This report provides an overview of our policies, procedures, and initiatives to prevent forced labour within our supply chain and operations.

Company Structure, Activities, and Supply Chains:

Structural Truss Ltd:

Structure:

Limited Corporation

Departmental Structure: Sales, Operations, Distribution

Operating at 443 12th Street, Fort MacLeod, AB

of Employees: 143

Organizational Mandate: Specialize in the design, manufacturing and transportation of custom roof trusses, floor systems and wall panels for every size of residential, commercial and agricultural projects.

Products include:

- Up to 120ft Roof Trusses
- Open Web Floor Systems
- Pre-Fab Wall Panels
- Engineered Components

Activities

Designing, selling, manufacturing, and distributing wood building products for the construction industry within Canada and United States.

Roof Trusses

Volume: 86,820 trusses

Open Web Floor Systems

Volume: 29,777 trusses

Pre-Fab Wall Panels

Volume: 18,276 panels

Engineered Components

Volume: 568,815 lineal ft

Locations from which Goods are Imported:

Supplier List:

Federated Co-op	Canada	Bulk Fuel	No	Diesel	Canada
Logic Lumber	Canada	Lumber Supplier	No	Lumber	Canada
Skana Forest Products	Canada	Lumber Supplier	No	Lumber	Canada
Tiaga Building Products	Canada	Lumber Supplier	No	Lumber	Canada
Weyerhaeuser SC Company	Canada	Lumber Supplier	No	Lumber	Canada

Structural Truss Systems & Forma Steel

PO Box 1690 / 443 12 Street Fort Macleod, AB T0L 0Z0

Phone: 403-553-3306 | Fax: 403-553-3896 | structuraltruss.ca | formasteel.ca

Service Providers Within Canada:

Live Electric

Microage Computers

Avail CPA

Front-Line Towing

Telus

Shaw Cable

Open Sky Engineering

Service Providers Outside Canada:

N/A

Forma Steel Ltd

Structure:

Limited Corporation

Departmental Structure: Sales, Operations, Distribution

Operating at 443 12th Street, Fort MacLeod, AB

of Employees: 78

Organizational Mandate: Create steel roofing, siding, trim & custom panels in a variety of gauges, colours and finishes for any building structure. We provide steel solutions for your project.

Products Include:

- Roofing & Siding
- Trims
- Specialty Steel (steel panels)
- Accessories (hardware & parts)

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Activities

Designing, selling, manufacturing, and distributing steel building products for the construction industry within Canada and United States.

Roofing & Siding

Volume: 7,246,392 feet

Trims

Volume: 3,018,160 feet

Specialty Steel/Steel Panels

Volume: 381,396 feet

Accessories/Hardware & Parts

Volume: 6753 orders packed, totally 774,057 pieces and total weight of 2,975,766 pounds

Locations from which Goods are Imported:

Supplier List:

Fasteners & Fittings	Canada
LeLand Industries Inc.	Canada
Marco Industries Canada Inc.	Canada
Aquacut Foam Inc. Div of Jacobs & Thompson Inc.	Canada
Stabilit Canada - O/A Graham	Canada
Cloverdale Paint	Canada
PTW Structural Solutions	Canada
Soprema Inc.	Canada
Sentry Building Innovations	Canada
Moore Sales Co., Ltd.	Canada
JFE Shoji Trade America, Inc	Canada
ArcelorMittal Dofasco G.P. (Dofasco)	Canada
Cannonball HNP	USA
Deks N. America, Inc.	USA
Logan Stampings Inc.	USA

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MWI Components
Malco Products Inc.
FILC

USA
USA
USA

Service Providers Within Canada:

Live Electric

Microage Computers

Avail CPA

Front-Line Towing

Telus

Shaw Cable

Open Sky Engineering

Service Providers Outside Canada:

NA

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Company Policy:

Structural Truss Systems Ltd and Forma Steel Ltd (referred to as the company or company's) is committed to upholding the highest standards of ethical conduct and human rights. Our policies explicitly prohibit the use of forced labour, including bonded labour, involuntary prison labour, and human trafficking, in any aspect of our operations or supply chain.

Our policy applies to all our suppliers and vendors, regardless of their size, location, or sector. We expect and require our suppliers and vendors to:

- Adhere to our Supplier and Vendor Code of Conduct, which sets out the minimum standards and expectations for their performance on human rights and labour standards, environmental management, anti-corruption, and other relevant issues.
- Provide us with accurate and complete information and documentation on their operations and supply chains, and to disclose any instances or allegations of forced or child labour in their business relationships.
- Cooperate with us in our due diligence and risk assessment process, and to provide us with access to their facilities, records, and workers for verification purposes.
- Participate in our monitoring and auditing program, and to implement corrective actions and improvement plans if any non-compliance or gaps are found.
- Communicate and cascade our policy and expectations to their sub-contractors, sub-suppliers, and other business partners, and to ensure that they comply with the same standards and requirements.

Supply Chain Due Diligence:

When conducting due diligence to identify risks of forced labor and child labor in supply chains, our companies will complete the following actions:

1. Risk Assessment and Mapping:
 - Identify Suppliers: Compile a list of all suppliers, subcontractors, and business partners involved in our supply chain.
 - Risk Prioritization: Assess which suppliers or regions pose higher risks based on factors like location, industry, and past incidents.
2. Supplier Audits and Assessments:
 - On-Site Audits: Conduct regular on-site audits to evaluate compliance with labor standards. These audits should be thorough and cover labor practices, health and safety, and environmental impact.
 - Questionnaires and Self-Assessments: Distribute questionnaires to suppliers to assess their practices. Ask about labor conditions, child labor policies, and due diligence efforts.
 - Third-Party Auditors: Engage independent third-party auditors to ensure objectivity and credibility.
3. Labor Practices Evaluation:
 - Labor Policies and Contracts: Review supplier contracts and labor policies. Ensure they prohibit forced labor, child labor, and other exploitative practices.
 - Working Conditions: Evaluate working conditions, including working hours, wages, and employee rights.

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- Age Verification: Implement age verification processes to prevent child labor.
- 4. Traceability and Transparency:
 - Trace Raw Materials: Trace the origin of raw materials (e.g., cotton, minerals) to ensure they are ethically sourced.
 - Supplier Transparency: Encourage suppliers to disclose their own supply chains and practices.
- 5. Collaboration and Capacity Building:
 - Supplier Engagement: Collaborate with suppliers to improve practices. Provide guidance on compliance and share best practices.
 - Capacity Building: Offer training programs to suppliers on labor rights, ethical practices, and risk mitigation.
- 6. Remediation and Corrective Actions:
 - Address Non-Compliance: If violations are identified, work with suppliers to address them promptly. Develop corrective action plans.
 - Long-Term Solutions: Focus on sustainable solutions rather than quick fixes. Help suppliers build capacity to prevent future violations.
- 7. Monitoring and Continuous Improvement:
 - Ongoing Monitoring: Continuously monitor supplier performance. Regularly assess compliance and address any emerging risks.
 - Feedback Loop: Use feedback from audits and assessments to improve due diligence processes

Impacts and Remediation

Should any gaps or adverse impacts be brought forward or found within our due diligence processes or policies, the company will address them expediently. Corrective actions taken by the company may include:

- Providing training and guidance to our suppliers and vendors on our policy and on the best practices and standards of human rights and labour standards.
- Requiring our suppliers and vendors to remediate any violations or non-compliance with our policy or the Canadian initiatives to address forced labour and child labour in supply chains
- Supporting our suppliers and vendors to improve their management systems and processes, and to adopt more sustainable and responsible practices.
- Terminating our suppliers and vendors that fail to comply with our policy or the Canadian response to forced labour and child labour in supply chains

The company will track our vendor and supplier audits along with any deficiencies and corrective actions to ensure improvement plans are documented.

Remediation of loss of income

In the context of forced labor remediation efforts, addressing the loss of income for vulnerable families is crucial. Our company's may provide the following remediation efforts to address the loss of income:

Financial Compensation:

- Provide direct financial support to affected workers and their families.
- Compensate for wages lost due to forced labor or child labor.
- Ensure timely payments to mitigate income gaps.

Supply Chain Improvement:

- Work with suppliers to improve labor conditions.
- Implement fair wages and better working hours.
- Encourage suppliers to adopt responsible practices.

Forced Labour and Child Labour Risks

The company's will map its supply chain internally and externally to assess and manage forced labour and child labour risks. Activities may include:

- Identifying all departments, divisions and functions within each company
- Assessing the risk of forced labour or child labour within each activity in each department
- Complete supplier and vendor audits
- Trace our supply chain back to raw material sources
- Identify critical points where risk may arise

When assessing risk, the company's will consider the following:

1. Geographical Context:
 - Regions known for forced labor or child labor.
 - Countries with weak labor regulations or enforcement.
2. Industry and Sector:
 - High-risk sectors (e.g., textiles, agriculture, mining).
 - Specific commodities (e.g., cotton, cocoa) associated with labor exploitation.
3. Supplier Profile:
 - Size and capacity of suppliers.
 - Past incidents or allegations related to labor violations.
4. Labour Practices:
 - Working conditions, wages, and hours.
 - Age verification processes.
 - Recruitment practices.

After assessing the mapped supply chain for the above factors, the company will assign a risk factor and prioritize risk for further investigation and mitigation. Mitigation and remediation efforts will follow our policy as in the above section regarding due diligence, impacts, and remediation

Training

The company's will effectively train our employees and stakeholders on the critical issue of forced labour using the following strategies:

1. Keeping employees informed about evolving legal frameworks, industry standards, and best practices related to forced labour
2. Providing external training that covers the concept of forces labour, its forms, and its impact on communities
3. Provide employees training on how to recognize signs of forced labour within supply chains
4. Participate in industry forums or public networks to learn and share

Training will be targeted to employees who are in contact with suppliers and vendors, or involved in procurement as well as members of the senior leadership team and shareholders. The general frontline employee population may receive generic training internally covering forced labour, child labour, and the company's efforts to ensure compliance.

Assessments for Effectiveness

Assessing the effectiveness of our company's efforts in ensuring forced and child labour are not being used in our activities and supply chains involves ongoing evaluation and measurement. The company will assess effectiveness using any or all of the following tactics:

- Regularly review policy implementation within the organization.
- Incident Tracking and Reporting
- Gather input from employees, suppliers, and other stakeholders.
- Assess their perception of policy effectiveness.
- Prepare annual reports on policy implementation.

Conclusion

The company's will prepare annual reports and complete questionnaires as required, and will include any details on steps taken to prevent and reduced forced labour. The company will attest to and sign the report and file it with the relevant government body.

Due Diligence and Risk Assessment for 2023/2024 Fiscal year

Summary

Our due diligence assessment found that our suppliers posed low risk for utilization of forced labour or child labour. Structural Truss Systems Ltd and Forma Steel Ltd reviewed supplier risk against Geographical Context, Industry and Sector, Supplier Profile, and Labour practices.

Structural Truss Systems Ltd

Supplier Name	Operating Country	Industry	Past incidents of labour violations	Materials Supplied	Material Origin Country	Labour Practices	Risk Level
Mitek	Canada	Manufacturing	No	Metal Plates, Hangars, Screws	Asia	North American Standard	Low
Federated Co-op	Canada	Bulk Fuel	No	Diesel	Canada	North American Standard	Low
Logic Lumber	Canada	Lumber Supplier	No	Lumber	Canada	North American Standard	Low
Skana Forest Products	Canada	Lumber Supplier	No	Lumber	Canada	North American Standard	Low
Tiaga Building Products	Canada	Lumber Supplier	No	Lumber	Canada	North American Standard	Low
Weyerhaeuser SC Company	Canada	Lumber Supplier	No	Lumber	Canada	North American Standard	Low

Forma Steel Ltd

Supplier Name	Operating Country	Industry	Materials Supplied	Material Origin Country	Risk Level
Fasteners & Fittings	Canada	Distributor	Fasteners	Canada	Low
LeLand Industries Inc.	Canada	Supplier	Zinc plated fasteners		
Marco Industries Canada Inc.	Canada	Manufacturer	Roof vent accessories	Canada	Low
Aquacut Foam Inc. Div of Jacobs & Thompson Inc.	Canada	Wholesaler	packaging	Canada	Low
Stabilit Canada - O/A Graham	Canada	Manufacturer	Panels	Canada	Low
Cannonball HNP	USA	Manufacturer	Post frame	USA	Low
Deks N. America, Inc.	USA	Supplier	Metal Roof Flashing	USA	Low
Cloverdale Paint	Canada	Supplier	Paint	Canada	Low
PTW Structural Solutions	Canada	Manufacturer	Framed Buildings	Canada	Low
Logan Stampings Inc.	USA	Manufacturer	Metal Stamping	Canada	Low
Soprema Inc.	Canada	Manufacturer	Waterproofing supplies	Canada	Low
Sentry Building Innovations	Canada	Manufacturer	Building envelope products	Canada	Low
MWI Components	USA	Manufacturer	Post frame products	USA	Low
Malco Products Inc.	USA	Manufacturer	Tools	USA	Low
FILC	USA	Material Supplier	Non woven and laminated material	USA	Low
Moore Sales Co., Ltd.	Canada	Mfg Representative	Consignee	Canada	Low
JFE Shoji Trade America, Inc	Canada	Supplier	Semi Finished Steel	Canada	Low
ArcelorMittal Dofasco G.P. (Dofasco)	Canada	Supplier	Steel products	Canada	Low

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Training Completed

The company provided information to its senior leadership team and procurement specialists regarding the evolving legal framework in relation to Canada's efforts to reduce and eliminate forced labour and child labour in supply chains.

Non Compliance and Corrective Actions Taken

The company found no non compliance, no issues reported, and no corrective actions needed.

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."

Brent Feyter, CEO

**The information in this policy does not take precedence over applicable government legislation and does not relieve persons using this publication from their responsibilities under applicable legislation.*



Brent Feyter, CEO



Date

I have the authority to bind Forma Steel Ltd. and Structural Truss Systems Ltd.