

Compliance Report: Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211) Reporting year 2023.

Titan Environmental Containment
777 Quest Blvd
Ile des Chenes, MB, Canada

Compliance Report: Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)

This report outlines the efforts and actions undertaken by Titan Environmental Containment to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211). Our company report will encompass the requisite information as stipulated in subsection 11(3), which mandates that an entity must provide details on each of the following aspects:

Requirement (a) – Structure, Activities, and Supply Chains

Legal structure: Corporation

Organizational structure See link <https://titanenviro.com/our-team/>

Number of employees: 185

Locations of operations:
777 Quest Blvd
Ile Des Chenes, MB
R0A 0T1

10 South Plains Road
Emerald Park, SK
S4L 1B7

3909 Allard Avenue
Leduc, AB
T9E 0R8

4390 Corporate Drive
Burlington, ON
L7L 5R3

4797 22 St. SE, Bay #10
Calgary AB T2B 0N

Unit #7 - 812 Burton Road
Vars, ON
K0A 3H0

Titan Environmental Containment provides sales, distribution, and installation of geosynthetics and civil construction materials both in Canada and outside Canada.

Importation of goods into Canada: We import a diverse array of products from various regions worldwide to meet the multifaceted demands of our clientele. Our product lines encompass a wide spectrum of solutions tailored to environmental lining and containment requirements.

From high-quality geomembranes designed to safeguard against environmental hazards to geotextiles engineered for optimal soil filtration, our offerings cater to a range of geotechnical and environmental needs.

Additionally, our inventory includes geogrids renowned for their efficacy in soil reinforcement and erosion control, alongside sediment control products to mitigate environmental impact. Complementing these solutions are our secondary containment systems to address environmental protection needs. Rounding out our portfolio are water drainage and control products, providing comprehensive solutions for managing water resources effectively.

Through our global sourcing network, we ensure access to cutting-edge technologies and superior-quality products to fulfill the diverse requirements of our clientele.

We prioritize partnering with suppliers who boast extensive experience and reputations within our industry. By collaborating with suppliers renowned for their long-standing history and exceptional track record, we ensure the procurement of top-tier products and services.

Our commitment to quality and reliability is underscored by our strategic selection of suppliers with proven expertise and established standing in the market.

Requirement (b) – Policies and due diligence processes

See Supplier [Code of Ethics](#) and section II. [Due Diligence and Risk Assessment](#):

Requirement (c) – Forced labour and child labour risks.

See Supplier Code of Ethics Section 1: [Compliance with Laws and Regulations](#); Section 2: [Ethical Business Conduct](#) Sec 3: [Labor Practices](#), Section II. [Due Diligence and Risk Assessment](#)

Requirement (d) – Remediation measures

Titan Environmental Containment is committed to upholding the highest standards of ethical conduct and human rights within our operations and supply chains. While we are prepared to take swift and decisive remediation measures in the event of any human rights violations, including forced labour and child labour, we are pleased to report that, to the best of our knowledge, no such violations have occurred within our activities and supply chains up to the present time. Consequently, no specific remediation measures have been necessary. However, we remain vigilant in our monitoring efforts and stand ready to take proactive measures to address any potential risks and uphold our commitment to responsible business practices and the well-being of all individuals impacted by our operations. The following measures are encouraged with our Supply Chain partners and stated in our Code of Ethics

- A. Supplier Capacity Building: Offering training and support to suppliers to enhance their capacity to identify and address forced labour and child labour within their operations, including implementing robust monitoring and compliance systems.
- B. Supply Chain Transparency: Enhancing transparency in the supply chain by disclosing information about suppliers, sourcing practices, and labour conditions to facilitate greater accountability and oversight.

- C. Grievance Mechanisms: Establishing accessible and effective grievance mechanisms that allow workers and community members to report instances of forced labour or child labour, ensuring prompt investigation and remediation of complaints.
- D. Policy and Advocacy: Advocating for stronger legal frameworks and regulatory enforcement to prevent and combat forced labour and child labour, both domestically and internationally, while also engaging in industry-wide initiatives to promote responsible business practices.

Requirement (e) – Remediation of loss of income

Titan Environmental Containment acknowledges the critical importance of addressing the potential loss of income for vulnerable families resulting from efforts to eliminate forced labour and child labour risks. However, after thorough assessment and monitoring, we are pleased to report that to the best of our knowledge, there has been no observed loss of income among vulnerable families associated with our activities and supply chains. Consequently, no specific measures have been deemed necessary to remediate such income loss. We remain committed to vigilantly monitoring and addressing any emerging risks in this regard to uphold our responsibility towards ethical business practices and the well-being of all individuals impacted by our operations.

Requirement (f) – Training

See Section II. Due Diligence and Risk Assessment:

- A. [Identification of Risks: 3.3. Training and Awareness](#)

Requirement (g) – Assessing effectiveness

See Section IV. [Enforcement and Penalties](#):

- A. Compliance with Provisions

See Section I A -[Statement of Commitment](#) and section IV. [Enforcement, Penalties & Compliance](#)

In addition to the requisite information as stipulated in subsection 11(3), we have developed a comprehensive report and policy framework to bolster the objectives outlined in Bill S-211

Combating Forced Labour and Child Labour in Supply Chains: Titan Environmental Containment's Approach

I. Commitment to Compliance:

A. Statement of Commitment

II. Due Diligence and Risk Assessment:

A. Identification of Risks

1. Supplier Assessments
2. Stakeholder Engagement
3. Training and Awareness
4. Continuous Monitoring
5. Collaboration with Suppliers

B. Risk Mitigation Measures

C. Description of Due Diligence Processes

III. Transparency and Reporting:

A. Publication of Information

IV. Enforcement and Penalties:

A. Compliance with Legal Provisions

V. Reporting and Review:

A. Submission of Annual Reports

B. Government Agency Reviews

VI. Conclusion:

A. Summary of Compliance

VII. Future Steps:

A. Continuous Improvement

I. Commitment to Compliance:

A. Statement of Commitment:

Cognizant of the grave implications of forced labour and child labour, Titan Environmental Containment is unwavering in its dedication to eradicating these abhorrent practices from our supply chains. We uphold strict standards, conduct audits, and collaborate closely with suppliers to ensure that every individual involved in our operations is treated with dignity and respect. Our commitment extends beyond compliance; it reflects our fundamental values of ethical conduct, social responsibility, and human rights advocacy.

II. Due Diligence and Risk Assessment:

A. Identification of Risks:

1. **Supplier Assessments:** Conduct assessments of our suppliers, including on-site visits where feasible, to evaluate their labour practices. Look for signs of forced labour and child labour such as restricted freedom of movement, underage workers, and poor working conditions.
2. **Stakeholder Engagement:** Engage with stakeholders such as non-governmental organizations (NGOs), industry groups, and local communities to gain insights into labour practices in specific regions or industries.
3. **Training and Awareness:** Provide training to our procurement and supply chain teams to recognize the signs of forced labour and child labour and understand the importance of addressing these risks.
4. **Continuous Monitoring:** Implement mechanisms for continuous monitoring of suppliers and supply chain activities to detect any changes or new risks related to forced labour and child labour.
5. **Collaboration with Suppliers:** Collaborate closely with suppliers to address identified risks, implement corrective actions, and build capacity to prevent forced labour and child labor in their operations.

By utilizing these methods in combination, Titan Environmental Containment can effectively identify and assess the risks of forced labour and child labour in our supply chain, enabling proactive measures to mitigate these risks and uphold ethical standards.

B. Risk Mitigation Measures:

In our commitment to ethical sourcing and sustainable practices, we have implemented robust measures to mitigate, and address identified risks within our supply chain. Central to this effort is the implementation of our Supplier Code of Conduct.

The Supplier Code of Conduct serves as a cornerstone document that outlines our expectations regarding ethical behavior, labour standards, environmental practices, and compliance requirements for all our suppliers.

Through the Supplier Code of Conduct, we establish clear guidelines and expectations for our suppliers to adhere to, thereby reducing the likelihood of encountering various risks such as forced labour, child labour, environmental violations, and unethical business practices.

Description of Due Diligence Processes:

Our due diligence processes are designed to ensure strict adherence to the principles outlined in our Supplier Code of Conduct, particularly in preventing forced labour and child labour.

Before engaging with any new supplier, our procurement team conducts a thorough evaluation process. This process includes assessing the supplier's adherence to labour standards, environmental regulations, and ethical business practices.

We utilize various tools and mechanisms to verify compliance, including supplier assessments and on-site audits.

Specifically focusing on labour practices, our due diligence processes involve scrutiny of the supplier's hiring practices and working conditions.

We also engage in continuous monitoring and evaluation of our suppliers to ensure ongoing compliance with our standards. This includes periodic audits, regular reviews of performance metrics, and prompt investigation of any reported violations.

Furthermore, we provide resources and support to our suppliers to help them improve their practices and address any identified areas of non-compliance. This collaborative approach fosters a culture of accountability and continuous improvement throughout our supply chain.

By integrating the Supplier Code of Conduct into our risk mitigation strategy and implementing rigorous due diligence processes, we are proactively addressing potential risks such as forced labour and child labour, thereby safeguarding the integrity and sustainability of our supply chain.

III. Transparency and Reporting:

A. Publication of Information:

1. Titan Environmental Containment maintains transparency regarding its efforts to combat forced labour and child labour by regularly updating relevant information on its website.
2. Examples of specific information made available to the public include:
 - Policy and guidelines related to ethical sourcing and labour rights. (Supplier Code of Ethics)

IV. Enforcement and Penalties:

A. Compliance and Provisions:

1. Titan Environmental Containment ensures compliance with the prohibitions and responsibilities outlined in the Act through a multifaceted approach:
 - Regular internal audits and assessments to monitor adherence to ethical standards.
 - Implementation of disciplinary measures for suppliers found to be in violation of labour rights or ethical standards.
2. Enforcement measures implemented internally include:
 - Suspension or termination of business dealings with non-compliant suppliers.
 - Implementation of corrective action plans to address identified gaps or violations.

V. Reporting and Review:

A. Submission of Annual Reports:

1. Annual reports submitted commencing in 2024 detail Titan Environmental Containment's efforts and progress in combating forced labour and child labour.
2. The reports include information on:
 - Measures taken to assess and mitigate risks within the supply chain.
 - Incidents of non-compliance identified and actions taken to address them.
 - Collaborative efforts with stakeholders and suppliers to promote ethical sourcing practices.
3. Reports will be submitted annually and via the Forced labour in Canadian Supply Chains website portal

B. Government Agency Reviews:

1. Titan Environmental Containment actively engages with government agencies for reviews of compliance with the Act.
2. Recommendations received from government agencies are carefully reviewed, and appropriate actions are taken to address any identified areas for improvement.

VII. Conclusion:

A. Summary of Compliance:

In summary, Titan Environmental Containment is committed to upholding the principles outlined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act. Through stringent due diligence processes, proactive risk mitigation measures, and transparent reporting practices, the company strives to ensure compliance with ethical sourcing standards and contribute to the eradication of forced labour and child labour.

VIII. Future Steps:

A. Continuous Improvement:

Titan Environmental Containment is dedicated to continuous improvement in compliance with the Act.

Planned steps include:

- Further enhancing supplier capacity building initiatives.
- Strengthening monitoring and evaluation mechanisms.
- Expanding stakeholder engagement efforts to gather feedback and insights for improvement.
- Further training for Supply Chain Personnel

Supplier Code of Ethics

Introduction: At Titan Environmental Containment and Titan Environmental USA we are committed to conducting business with integrity, honesty, and respect for all individuals and communities. As an essential part of our supply chain, we expect our suppliers and partners to uphold the same high ethical standards and principles. This Supplier Code of Ethics outlines the fundamental expectations we have for our suppliers in their business practices and interactions.

1. Compliance with Laws and Regulations:

- Suppliers must comply with all applicable laws, regulations, and standards in the countries where they operate, including but not limited to labor laws, environmental regulations, and anti-corruption laws.
- Suppliers must maintain appropriate licenses, permits, and certifications necessary to conduct their business operations.

2. Ethical Business Conduct:

- Suppliers must conduct their business with integrity, honesty, and fairness, and avoid engaging in any form of unethical or illegal behavior.
- Suppliers must not participate in bribery, corruption, extortion, or any other form of improper inducement or influence.

3. Labour Practices:

- Suppliers must uphold the principles of fair labour practices and provide safe and healthy working conditions for all employees.
- Suppliers must not employ forced labour, child labour, or engage in any form of human trafficking.
- Suppliers must respect the rights of employees to freedom of association and collective bargaining.

4. Environmental Responsibility:

- Suppliers must minimize their environmental impact and strive to operate in an environmentally sustainable manner.
- Suppliers must comply with environmental regulations and standards, including those related to pollution prevention, waste management, and resource conservation.
- Suppliers are encouraged to implement measures to reduce energy consumption, minimize emissions, and promote recycling and reuse.

5. Conflict of Interest:

- Suppliers must avoid conflicts of interest and disclose any potential conflicts that may arise in their business relationships with Titan Environmental Containment and Titan Environmental USA.
- Suppliers must not engage in any activities that could compromise their objectivity, independence, or loyalty to Titan Environmental Containment and Titan Environmental USA

6. Confidentiality and Intellectual Property:

- Suppliers must protect the confidentiality of any proprietary or confidential information shared with them by Titan Environmental Containment and Titan Environmental USA.
- Suppliers must respect the intellectual property rights of Titan Environmental Containment and Titan Environmental USA and third parties, and not use or disclose confidential information or intellectual property without proper authorization.

7. Social Responsibility:

- Suppliers are encouraged to support the communities in which they operate through philanthropic activities and community engagement initiatives.
- Suppliers must respect human rights and diversity, and prohibit discrimination on the basis of race, ethnicity, religion, gender, sexual orientation, disability, or any other characteristic protected by law.

8. Reporting Violations:

- Suppliers must establish procedures for employees to report any violations of this Supplier Code of Ethics and ensure that appropriate actions are taken to address such violations.
- Suppliers must cooperate with Titan Environmental Containment and Titan Environmental USA in any investigations related to potential violations of this Supplier Code of Ethics.

Conclusion: By adhering to this Supplier Code of Ethics, we believe that our suppliers can contribute to the mutual success of our businesses while upholding the highest standards of ethical conduct. We appreciate your commitment to these principles and look forward to continuing our partnership based on trust, integrity, and respect.

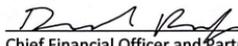
Attestation Letter for BILL S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act

Titan Environmental Containment
777 Quest Blvd
Ile des Chenes, MB, Canada
ROA0T1

May 28, 2024

In accordance with the requirements of the BILL S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, we, the undersigned members of the Executive Team of Titan Environmental Containment, hereby attest that we have reviewed the information contained in the report for the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we 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 of 2023.

Signatures:

 Derek Bishop
Chief Financial Officer and Partner
May 28, 2024

"I have the authority to bind Titan environmental Containment."