



# Forced Labour in Canadian Supply Chains

May 2024

## **Addressing Child Labour and Forced Labour**

Unified Alloys is committed to engaging in employment practices that meet all ethical and legal standards, including laws and regulations related to forced and child labour, in the markets in which it operates. The Company expects its suppliers to share and uphold these same commitments across their business operations.

Our company expects its suppliers to flow these expectations through their supply chains – including to raw material, component, or ingredient suppliers.

All workers across Unified Alloy's operations and its suppliers' operations, must work under voluntary conditions. Unified Alloys and our suppliers will not use any form of forced or involuntary labour, including prison labour, indentured labour, bonded labour, military labour, slave labour or any form of human trafficking.

As per Unified Alloy's policies, the use of child labour that contravenes local labour laws within our operations or by our company's suppliers is strictly prohibited. Management is responsible for ensuring that child labour does not occur at any of the company's locations and manages the risk of child labour in the company's supply chain relationships.

# Organizational Structure

## **Departmentation:**

Unified Alloys is organized into several key departments, including:

- Management
- Finance
- Sales
- Information Technology
- Operations
- Human Resources

## **Chain of Command:**

The organizational hierarchy follows a top-down approach:

- Ownership
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO) / Chief Operations Officer (COO)
- Department Managers
- Team Leads
- Employees

Total Employees: 102

# Activities

## **Production and Distribution:**

Unified Alloys distributes a wide range of alloy process piping components to meet the needs of various industries, including oil and gas, petrochemicals, energy, mining, water, forestry, infrastructure, marine, chemical, and food processing.

Locations of Operation: Unified Alloys operates five locations across Canada

- Edmonton, AB
- Calgary, AB
- Langley, BC
- Sarnia, ON
- Dorval, QC

## **Importation:**

Goods Imported: The company imports raw materials and finished goods required for sale or distribution.

Source Locations: Imports are sourced from various countries across North America, Asia, and Europe, ensuring a robust supply chain.

# Supply Chains

## Overview:

Unified Alloys supply chain encompasses sourcing raw materials, manufacturing processes, and distribution of final products. This includes direct and indirect suppliers and service providers within Canada and internationally.

## Source Countries and Regions:

Products: Sourced globally, including regions known for high-quality metals such as North America, Europe, and Asia.

Distribution: Products are distributed across Canada and the USA, catering to various industrial sectors.

## Key Suppliers:

Unified Alloys works with a network of trusted suppliers who adhere to stringent quality standards to ensure the reliability and integrity of the products.

## Procedures and Due Diligence

Where possible, the Company will work with suppliers in violation of the Supplier Code of Conduct to develop and implement a remediation plan. However, if a supplier is unwilling or fails to make necessary changes to their practices, the Company may cease its relationship with that supplier.

The Company has mechanisms in place to ensure compliance with its policies and to continue mitigating the risk of forced and child labour being used in the Company's operations and supply chains.

The Company has introduced a Modern Slavery and Forced Labour Policy, additionally adding clauses in supplier contracts that require compliance with this policy. Under this policy, the Company reserves the right to monitor and verify compliance. This may include information requests to validate conformance and/or on-site visits or inspections.

Unified Alloys conducts an annual survey to assess compliance with Canadian legislation regarding forced labour and child labor in our supply chain. The survey is distributed to suppliers to gather essential information on their adherence to relevant policies. Responses are analyzed to identify areas for improvement, fostering transparency and accountability.

Additional information on procedures and due diligence strategies can be found by visiting the Modern Slavery and Forced Labour Policy in the link below

[\*\*EH-P-510 Modern Slavery and Forced Labour Policy\*\*](#)

Related:

[\*\*Core Values\*\*](#)

[\*\*HSE-M-0305 Violence and Harassment Policy\*\*](#)

## **Accountability and Remediation**

Unified Alloys executives and management teams are required to review and sign off on the Modern Slavery and Forced Labour Policy annually, and to ensure it is upheld with all employees in each of the Company's operating facilities and locations. Violations of Company policy will result in the Company taking effective remedial actions, including, but not limited to, termination.

The Company assesses risks of forced labour or child labour across its supply chain, and determines priorities based on areas of highest risk. While the Company's operations predominantly reside in Canada, its complex supply chain extends globally. Since labour practices (including forced and child labour) can vary significantly by geographic location, industry and business activity, the Company continually assesses and monitors its own operations, and our supply chain partners to mitigate and manage these risks.

The Company has not identified any instances of forced labour or child labour in its supply chains at this stage. If the Company identifies incidents of forced labour or child labour within this supply chain, it will consider the appropriate remedial strategy in compliance with applicable law.

## Training

Unified Alloys continues to build on its ethical business practices by focusing on further awareness, engagement and knowledge building across our businesses.

Unified Alloys employees have received comprehensive training on Modern Slavery Risk Assessment and Corporate Supply Chain Compliance as required by Canada's Modern Slavery Act. The training is designed to provide staff with the essential knowledge to recognize, assess and prevent forced labour and child labour within our company and supply chains.

Unified Alloys executive has reviewed programs to improve its understanding of specific due diligence processes regarding forced and child labour, and to monitor our current practices. The Company's findings from this project will be used to create additional programs and best practices to fortify its approach to addressing child labour and forced labour and mitigating associated risks in the Company's business and supply chains.



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.

Darren Hansen

CEO

May 31, 2024

A handwritten signature in black ink, appearing to read 'Darren Hansen', written in a cursive style.

I have the authority to bind Unified Alloys.