



**Government of Canada**

**Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”)**

**Bill S-211 Report**

**1. Introduction**

It is with great pride and a deep sense of responsibility that we present this report detailing our commitment and efforts to prevent forced labor within our supply chain. At Viega LLC, we recognize the gravity of the global challenge posed by forced labor and its impact on human rights. Our commitment to ethical business practices extends beyond mere compliance—it is a cornerstone of our identity.

In this report, we will share the comprehensive measures we have implemented to identify, assess, and mitigate the risk of forced labor in our supply chain. By embracing transparency, accountability, and collaboration, we aim to set a standard for responsible business conduct that goes beyond mere compliance with regulations. Our journey towards contributing to the eradication of forced labor is not just a corporate obligation but a moral imperative that we embrace wholeheartedly.

As you delve into the pages of this report, we invite you to join us on this journey of continuous improvement and ethical leadership. Together, we can create a supply chain ecosystem that stands as a beacon of fairness, dignity, and respect for all. Thank you for your interest in our commitment to preventing forced labor, and we look forward to your engagement and support in this critical endeavor.

**2. Structure**

The legal structure of Viega LLC (“**Viega NA**”) is a limited liability company formed under the laws of the State of Delaware, United States of America, and is part of the Viega Group of companies ultimately a subsidiary of Viega GmbH & Co. KG (“**Viega Global**”). Viega Global is a German partnership operating mainly in Europe, Asia, and Oceania. Viega NA operates independently in North America and is the only global entity importing products into Canada.

The organizational structure of Viega NA consists of several departments that play a role in managing and supporting the company’s supply chain, but ultimately the two departments with the most direct responsibility are Supply Chain and Legal. Within the Supply Chain department, the Procurement team is responsible for executing the processes that assess, onboard, and audit the company’s suppliers and vendors, including for human rights and forced labor activities. Within the Legal department, the Compliance team is responsible for implementation, training, and internal audit of company policies and directives meant to comply with the various legal and overall ethical obligations applicable to the company’s business operations. Both departments report directly to the Chief Executive



Officer of Viega NA, allowing the teams to collaborate efficiently and effectively to achieve the company's goals and to drive its overall success.

The basis for the company's compliance efforts is centered around the "Viega Values" of achievement, empowerment, respect, responsibility, and trust, as well as setting clear goals necessary to promote a culture of compliance. Compliance then becomes the basis for values-oriented behavior and behavior that does not comply with the law is not tolerated. The company's values are then aligned with its purpose: "Installing the lifelines for the buildings of tomorrow," the company can reliably shape the future and is always committed to the highest quality.

Viega NA has approximately 1,000 employees, 20 of which reside in Canada. If you include Viega Global, the total employee count is approximately 5,000.

Viega NA is a member of the CTPAT program in affiliation with the United States Customs and Border Patrol.

### **3. Supply Chain Overview**

Viega NA imports approximately US\$40M of goods from the United States into Canada from its manufacturing facilities in Kansas and distribution centers in Nevada and Pennsylvania. Of all Viega NA products, 65% are made or assembled in the United States, with the remaining 35% being manufactured and packaged in Germany. Viega NA imports products and materials from a total of 12 countries in Europe, Asia, and Oceania.

### **4. Policies and Due Diligence**

For the 2023 calendar year, Viega NA has worked in conjunction with Viega Global to leverage the global policies and directives within the company's Code of Conduct and Supplier Compliance Code. In addition, Viega NA is in the process of implementing a regional Supplier Code of Conduct and updating its Corporate Compliance Manual to address the company's growth and changing priorities with respect to compliance including forced and child labor. While leveraging the Viega Global policies and processes is already in place for a majority of the Viega NA supply chain that is imported from Viega Global, implementation of more robust regional processes around supplier onboarding, annual supplier risk assessments, and obligating suppliers to comply with the Viega NA Supplier Code of Conduct through its contractual templates, is forthcoming in 2024. Approximately 65% of Viega NA products are manufactured by Viega Global and imported under intercompany agreements, and therefore are subject to more robust policies and processes with respect to supply chain due diligence.

### **5. Risks in Supply Chain**

No action taken in 2023 to assess particular risks in the regional supply chain.



**6. Remediation Measures**

No action taken in 2023 to implement a remediation plan for any identified risks in the regional supply chain.

**7. Training**

No action taken in 2023 to implement a regional training program for all Viega NA employees, however, Viega NA strives to follow the Viega Global employee code of conduct policies that address forced and child labor.

**8. Effectiveness Assessment**

No action taken to date to assess the effectiveness of the regional policies in preventing and reducing the risks of forced labor and child labor in the Viega NA business and supply chains.

**9. Closing Statement**

While Viega NA is proud of the strides it has made, particularly with respect to our global supply chain, we acknowledge that eradicating forced labor will require additional efforts and sustained vigilance from a regional perspective. Further, we recognize that the implementation of more robust policies, processes, and structure will be necessary in order to achieve our goals in this area. We remain committed to this cause and will continue to work tirelessly to uphold the dignity and rights of all workers throughout our supply chain.

As detailed in this report, we have been able to leverage a comprehensive global supplier vetting processes, ongoing audits, and partnerships with credible third-party organizations to ensure compliance with internationally recognized labor standards. Furthermore, we recognize the importance of transparency and accountability, which is why we are dedicated to openly sharing our progress and challenges in combating forced labor across all portions of our business operations.

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**10. 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 this report for the entity 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 2023.

Ellis Rosenzweig

Vice President, General Counsel

May 31, 2024

DocuSigned by:  
*Ellis Rosenzweig*  
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I have the authority to bind Viega LLC