



## **Forced Labour and Child Labour in Supply Chains Act Annual Report**

**Entity:** Weatherhaven Global Resources Ltd.

**Financial Reporting Period:** January-December 2023

**Business Number:** 804565265RC0003

**Entity Categorization:** Corporation

**Industry:** Production/Manufacturing

**Address:** #130 – 8610 Glenlyon Pkwy, Burnaby, BC, V5J 0B6

The following report outlines Weatherhaven Global Resources Ltd.'s (the "Entity") supply chain processes and measures taken to abstain from forced labour in the workplace.

## **Forced Labour in Canadian Supply Chain**

### **Steps Taken to Prevent and Reduce the Risk of Forced Labour or Child Labour**

The Entity has in place internal policies and sustainability guidelines regarding human rights, child labour, and forced labour. Employees are encouraged to understand these policies and speak out should there be any concern at the Entity's ability to uphold its standards.

The Entity has a Vendor Requirements Manual that outlines the Entity's intention to abide by Bill S-211. All prospective vendors are required to read and understand the requirements before engaging in a business relationship with the Entity. In the requirements manual, the Entity requires any vendors to also be in compliance with the new legislation, and any new vendors to provide a written commitment ensuring they will abide by the same standards.

Within the Vendor Requirements Manual, the Entity includes a risk assessment for vendors to consider in relation to human rights and forced labour for the goods and services they provide. All vendors are required to review their own internal policies towards forced labour, and if there are any areas of concern that they be reported to the Entity (Appendix A in the Vendor Requirement Manual). Once received, the Entity would evaluate the risks and determine whether they can be mitigated, remediated, or improved.

The Entity asks all vendors to complete an anti-forced labour and child labour questionnaire annually (Appendix B in the Vendor Requirement Manual). This questionnaire serves as a method to both audit vendors before acceptance, and monitor existing vendors to ensure compliance with the new legislation. On-site audits also serve as a means to monitor vendors and confirm the information they provide in the questionnaire is accurate.

### **Structure, Activities, and Supply Chains**

The Entity is a private corporation with a head office in Burnaby, British Columbia with a production and warehouse facility in Brockville, Ontario. The Entity has 80 full time employees in Canada split between its two locations.

The Entity's primary activity is the development and production of shelter solutions that can provides a wide range of application in the government, military, commercial and medical markets.

The Entity's supply chain group is primarily centralized in Canada. Many of the goods and services sourced for our products are from North America with select components coming from Asia and Europe.

### **Policies and Due Diligence Processes**

The Entity has developed policies as a part of its sustainability, human rights and social guidelines that are available both within our intranet as well as publicly available online on our website.

For our specific vendor qualification and maintenance process, the Entity required all vendors to complete and sign its Vendor Requirements Manual, which continues to detail the Entity's policies and standards around forced labour. There is also a requirement to complete an annual forced labour questionnaire and risk assessment from each vendor. The Entity also performs on-site audits to verify vendor compliance with its standards. Frequency of visits is dependent on the vendor's classification and level of activity.

Through these practices, the Entity has embedded responsible business conduct (RBC) into its policies and management systems. The Entity continues to strive to improve its policies by complying with Organization for Economic Co-operation and Development (“OECD”) due diligence guidance and will explore additional steps to take to ensure proper due diligence is performed.

### **Forced Labour and Child Labour Risks**

The Entity acknowledges that there are parts of its supply chain that carry a labour risk and have taken steps to assess and manage the risk through our supply chain mapping (see Exhibit A) to assess weakness augmented with discussions/training internally with relevant departments. These risks are identified in the manufacturing sector and industry. While the risk for forced labour in the Canadian market is low, the Entity does have vendors in the USA and procure from select vendors in Asia that may have a higher level of risk for forced labour. Aspects of the business that would constitute to this risk include:

- Direct suppliers and their operation locations.
- Raw materials used in its supply chain; specifically fabric and textiles.
- Type of products it purchases.

The Entity uses its policies and procedures around vendor acceptance to help mitigate these risk areas. Vendors are asked to complete an anti-forced labour questionnaire and provide their own risk assessment on their policies and processes to the Entity before vendor acceptance. The Entity monitors vendors’ activity and requires the questionnaire and assessment to be performed annually to ensure compliance with its standards are met which is reinforced by on-site visits to validate claims and controls by the vendors.

### **Measures Taken to Remediate Forced Labour or Child Labour**

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

### **Measures Taken to Remediate Loss of Income to Vulnerable Families**

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

### **Employee Training**

In 2023, the Entity did not have any mandated training on forced labour; however it does have policies and due diligence processes for both internal and external use which are reviewed and approved by Senior Management and subsequently shared with department heads to inform their respective departments. Employees who deal with vendors (i.e., Buyers and Quality Assurance) understand and follow the vendor acceptance process which includes questionnaires and risk assessments on vendors’ ability to meet the Entity’s requirements towards forced labour. In 2024, the Entity is exploring options and resources available internally and externally to provide active training to employees to reinforce the Entity’s stance on modern slavery.

### **Assessment of Effectiveness**

The Entity assesses the effectiveness of its policies and procedures on forced labour by working with its vendors on an ongoing basis to ensure compliance by:

- Mandatory completion of Annual anti-forced labour questionnaire
- Vendor risk assessment performed by the Entity

- Evaluation of the vendors' business practices through discovery, discussion and on-site visit

Should any vendors responses cause concern on their ability to maintain the standard on forced labour, the Entity will perform an additional analysis to determine if it will continue the business partnership. The Entity makes it clear to all external business partners its stance on compliance with the new legislation and has placed the same expectation on its vendors.

## Supplementary Information

### Public Information and Policies

The Entity has included on its website the following forms and surveys as referenced in this report:

- Vendor Qualification Survey
- Distributor Qualification Survey
- Service Provider Qualification Survey
- Vendor Requirements Manual

In addition to the forms and surveys, the Entity also identifies its sustainability guidelines for external business partners (vendors). Included in these sustainability guidelines are specific guidelines to the Entity's policies on 'Human Rights', 'Child Labour', and 'Forced Labour, Human Trafficking, & Employment Eligibility'.

All information can be found on the Entity's website under 'Supplier Information':

<https://weatherhaven.com/Supplier-Information>

### Internal Processes

The Entity has an internal procedure for the vendor acceptance process, which outlines the forms and policies vendors must provide (Exhibit A). This procedure indicates which personnel group within the Entity is responsible for each step throughout the vendor acceptable process.

Weaknesses in this procedure are evaluated at every stage through this procedure. The vendor qualification survey is one of the first stages that help identify weaknesses in the process. The on-site audit also serves as a good check on vendors on how they are aligning their practices with the information provided.

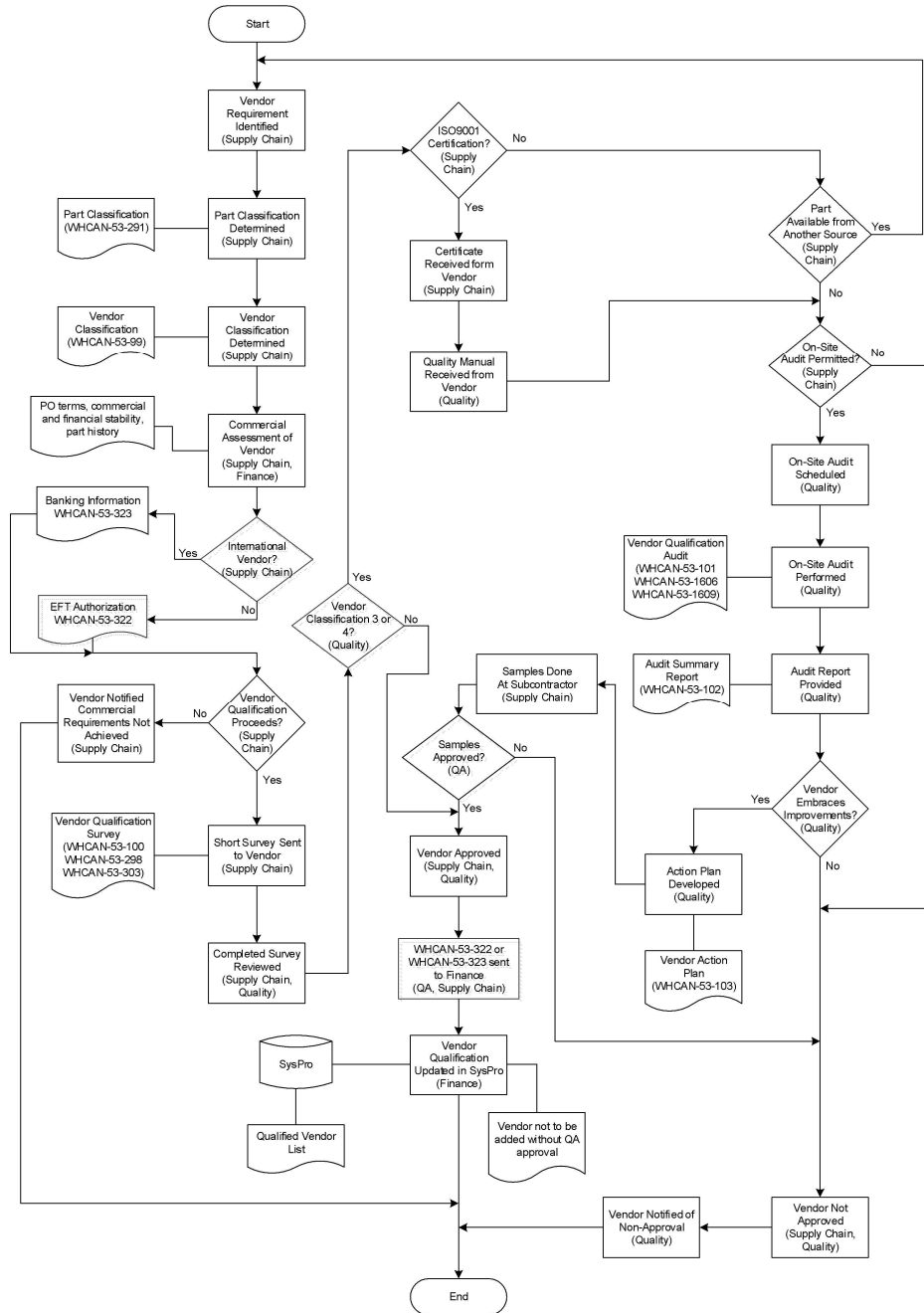
**Exhibit A – Vendor Qualification and Acceptance Procedure**

**Inputs**

Supply Chain Requirement  
Engineering Requirement  
Strategic Requirement

**Outputs**

Approved Production Vendor  
Qualified Vendor List  
Goods/Service Reliability  
Customer Satisfaction



**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.

Name: Ray Castelli

Title: Chief Executive Officer

Date: 05/31/2024

Signature: 

*I have the authority to bind 'Weatherhaven Global Resources Ltd.'*