



WHITEWATER®

EST. 1980

May 2024

## **BILL S-211 CORPORATE REPORT for WhiteWater West Industries Ltd.**

**An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff**

### **Introduction**

WhiteWater West Industries Ltd. (WhiteWater) operates on the collective understanding that we have a responsibility to help create a more sustainable future. We are committed to upholding and protecting human rights in alignment with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labor Organization Core Conventions.

This report is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. It outlines the approach and initiatives by WhiteWater to identify and address the risk of forced labour and child labour in its business operations and supply chains during the financial year commencing February 1, 2023, and ending January 31, 2024.

### **Our Structure, Operations & Supply Chain**

#### ***Structure***

WhiteWater West Industries Ltd. is a privately owned company and was established in 1980 with one clear purpose, to create places where families unite and make joyful lasting memories.

WhiteWater's Head office is in Richmond, BC. It is the parent company of:

- WhiteWater Industries Inc. (USA), parent company of Flowrider Inc. (operating in USA),
- WhiteWater International LLC (operating in United Arab Emirates),
- WhiteWater ERA GmbH (operating in Germany),
- Chutter Attractions Company (operating in China),
- Surf Waves Ltd. (UK), Parent company of Murphy Waves Ltd. (operation in the UK)

#### ***Operations***

WhiteWater is one of the largest designers and manufacturers to the water park and attractions industries. From park planning and design to manufacturing, installation and maintenance, we provide comprehensive service solutions to transform the waterpark vision into vibrant realities.

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WhiteWater Architects, Engineers, Supply Chain professionals and Project Managers work with our global clients to build and install experiences for their guests. WhiteWater employs approximately 500 employees with most staff located at head office in Richmond, BC.

**Departments in HQ,  
Richmond, BC**

Architecture, Sales and Marketing, Estimation, Engineering, Product Management, Project Services, Performance Services. Finance, IT, Quality, Legal, and Supply Chain.

**Manufacturing Plant**

WhiteWater's manufacturing plant is in Delta, BC. It employs approximately 45 people. The plant makes specialty parts & sub-assemblies, performs kitting, painting, and packaging for our global projects.

**Contract  
Manufacturers/suppliers**

WhiteWater has 5 major contract manufacturers/suppliers: 3 major fiberglass suppliers - one is in the USA, one is in Turkey, and one is in the Philippines. 2 major structural steel suppliers - one is in Mainland China, and one is in United Arab Emirates.

**Sourcing & Procurement**

WhiteWater has 1120 active suppliers. They are based in 66 countries on 5 continents. We work hard to build a robust and sustainable supply chain.

***Supply Chain***

WhiteWater's Supply Chain serves as the backbone of the organization's operations, overseeing the procurement process from start to finish. Tasked with sourcing materials, negotiating contracts & ensuring timely delivery of all products. Supply Chain plays a critical role in maintaining efficient supply chain operations.

WhiteWater sources raw materials, parts, finished products, and various services from a global supply chain. There are 1120 active suppliers, located in 66 countries on 5 continents. We source and procure the followings:

**Raw materials** – including steel, PVC, ABS and Lexan sheets, Paint, Gelcoat, wood, packaging materials.

**Parts** – including Fibre glass parts (FRP), electrical parts, cables, sensors, electrical panels, hardware, netting, decking, lighting, plastic parts, steel parts and sub-assembled parts.

**Finished products** – including pumps, water ride boats, theming elements, and turn-key products.

**Engineering services** – including sub-contract design.

**Construction Supervision** – including on-site installation services and repair services.

**Logistic services** – including freight forwarders, custom brokers, trucking companies.

**IT services** – include software, hardware and service suppliers in the HQ offices and regional offices.



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In addition to source and procure from global suppliers, WhiteWater has a manufacturing facility in Delta, BC, which also supplies to the global projects.

## Policies and due diligence processes

With a focus on human rights due diligence, we review the company's supply chain policies and take these preventative actions:

- 1) WhiteWater "**New vendor policy**" specifies "The supplier respects the equal rights of men and women, does not use child labour in any part of their business operations." This applies to all new vendors in the global supply chain.
- 2) WhiteWater Purchase order "Terms and Conditions" specifies "**APPLICABLE LAWS:** Seller warrants and agrees that it has complied and will comply with all applicable Federal, Province/State and local laws, codes, and regulations. This agreement shall be governed by the laws of Canada."
- 3) Two screening questions are added to WhiteWater "**Supplier Initial Evaluation form**":
  - "Do you use forced or child labour in your plant or production? (Canadian Bill S-211)?"
  - "Does your suppliers use forced or child labour in their plant or production?"WhiteWater will not select the supplier who answers "Yes" to above screening questions.
- 4) WhiteWater sent "Bill S0211 Supplier Communication Letter" to our major global suppliers requesting the suppliers to review their supply chain and to comply with Bill S-211. The feedback/reply from the global suppliers are positive.
- 5) WhiteWater requests the major suppliers to sign "**Supplier agreement addendum**" that includes a supplier code of conduct:

Compliance with Forced Labor Laws:

- *Supplier agrees not to use forced labour, including convict labour, indentured labour, or child labour, in violation of Canadian laws, including Fighting Against Forced Labour and Child Labour in Supply Chains Act.*
- *Supplier will undertake sufficient supply chain due diligence for materials it uses to make goods. This shall include supply chain mapping, tracing, and tracking using appropriate methods and technology. Supplier shall make all due diligence information available to Buyer upon request. Supplier further agrees to evaluate and address risks of human trafficking and slavery within its supply chain; to monitor its vendors and conduct audits to evaluate compliance with forced labour obligations; to require Supplier's direct vendors to certify that no forced labour was used in making the goods or parts or components of the goods; and to develop and maintain a forced labour compliance plan that includes appropriate engagement and training of employees, vendors, and other stakeholders.*

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- *Supplier agrees to take appropriate remedial action if indicators of forced labour are found within its supply chain. Remedial action may include the development of a corrective action plan, termination of the relationship, or other actions as appropriate.*

The above supplier code of conduct will be included in all future new **"Supplier agreement"**.

## Forced labour and child labour risks assessment:

WhiteWater risk assessments focus on three main areas: our own manufacturing facility, our HR recruiting process and our global supply chain. We have taken the following steps to identify and address the risks:

- 1) WhiteWater **Manufacturing facility in Canada** - considering the company employs our direct workforce and operations, we believe the risks of modern slavery in our own facility to be low.
- 2) WhiteWater has an established **HR** recruiting process which ensures all workers are recruited voluntarily. The details are given in the answers to the questionnaire. We believe the risks of modern slavery in our recruiting process to be low.
- 3) WhiteWater has a complex **global supply chain**, including 1120 active suppliers on 5 continents. A new global Supply chain mapping has been done to identify High, Medium and Low risk suppliers by countries, regions and annual spending. During the supply chain mapping, we identified over 50 major global suppliers and sent "Bill S-211 Communication Letter" to all of them requesting compliance to Bill S-211. We received positive feedback from the global suppliers. We believe the risks of modern slavery in our Global supply chain to be low. An internal report tracking Supplier responses and compliance has been set up. This communication letter will be sent out to global suppliers annually.

WhiteWater Supply chain and Quality Staff often audit major suppliers' facilities. During these audits, visual inspections are done by WhiteWater staff to identify any risks of force/child labor. Questions regarding forced/child labor are also raised to executives of the suppliers.

## Remediation

WhiteWater has not identified any cases of forced labour and child labour in our Global Supply Chain.

If forced/child labour is identified within a supplier, WhiteWater will take immediate action to eliminate this supplier from our supply chain.

## Employee Training

WhiteWater is committed to providing guidance, training, and support to ensuring employees in the organization are aware of our commitment to Bill S-211.

We took two steps to provide the training on this topic. The 1<sup>st</sup> training was given to all supplier chain professionals in the company. The 2<sup>nd</sup> training was announced by President, Water Parks to all employees.



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## Assessing effectiveness

WhiteWater is committed to continuous improvement in promoting and supporting human rights within our company and throughout our supply chain. We understand the importance of taking a collaborative approach to addressing human rights issues and regularly assess the effectiveness of our policies, due diligence actions and industry engagement to manage modern slavery risks. We identify and manage the effectiveness of our actions in the following ways:

- Assessing and preventing modern slavery risks during the prequalification and onboarding process of new suppliers.
- Sending the communication letter annually to our suppliers, requesting their commitments to fighting against forced/child labor.
- Eliminating a supplier who cannot comply with this Act.
- Working closely with our suppliers to identify, assess and manage potential modern slavery risks.
- Auditing our suppliers periodically to confirm the suppliers' compliance to Bill S-211.
- Ongoing training and review of policy will be conducted on an annual basis with all employees and the global suppliers.
- Publishing this Bill S-211 Corporate Report on our publicly accessible website by May 31, 2024.
- Reviewing our supply chain map and policy annually to identify areas for improvement in response to this Act.

## Authorization

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending January 31, 2024. It has been issued on behalf of WhiteWater West Industries Ltd. and approved by WhiteWater West Industries' Board of Directors.

Signed,

### Onno Meeter

President, Water Parks  
WhiteWater West Industries Ltd.