

# Fight Against Forced and Child Labour Report

Fiscal Year 2023



Wyse Meter Solutions



## SECTION 1 | INTRODUCTION

This Report is produced by Wyse Meter Solutions Inc. (“**Wyse**”) for the financial year ending November 30, 2023 (the “**Reporting Period**”) and sets out the steps taken to prevent and/or reduce the risk that forced or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by Wyse. This Report constitutes the first report prepared by Wyse 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* (the “**Act**”).

Founded in 2006, Wyse Meter Solutions is an industry-leading utility submetering and billing company committed to creating superior living experiences within sustainable buildings. We work with more than 200 owners, developers, and managers in the Canadian real estate industry, across more than 285,000 suites in seven provinces.

Our organization adheres to the highest industry standards. As proud members of leading industry associations, Wyse is dedicated to upholding their codes of conduct. By adhering to these standards, we enhance transparency, integrity, and accountability in our business activities.

Wyse is committed to preventing and reducing the risk of forced or child labour within our business, as well as among our partners, suppliers, and manufacturers.

## SECTION 2 | STEPS TAKEN DURING THE PREVIOUS FINANCIAL YEAR TO PREVENT/REDUCE THE RISK OF FORCED AND/OR CHILD LABOUR

### GOVERNANCE

Our Code of Conduct outlines Wyse’s collective commitment and responsibility to foster a respectful, professional environment for employees, clients, and visitors. In 2023, we reviewed the code to ensure we are upholding the highest industry standards. Our intention is to add a section emphasizing the importance of respecting human rights and prohibiting involuntary labour practices within our operations and supply chain.

### TRACKING AND MONITORING

In 2024, Wyse began the process conducting an internal assessment of our Tier 1 supply chain. When that process was complete later in 2024, it showed a low risk of forced or child labour practices, as Tier 1 is composed of suppliers located in Canada and the United States, both highly regulated and monitored to protect civil rights, including worker rights.

Wyse is committed to fostering an environment where open, honest communications is the norm for our employees, not the exception. That’s why Wyse promotes a confidential, third-party reporting mechanism for employees (EthicsPoint) to safely report violations of policies or standards that have occurred, including instances of forced or child labour.



## SECTION 3 | WYSE STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

### STRUCTURE

Wyse is a corporation that functions as a public utility in British Columbia and as a regulated unit submetering provider in Ontario. The company is headquartered in Concord, Ontario and holds a submetering license (ES-2019-0173) under the Ontario Energy Board. Wyse has 100 employees in Canada. Since 2018, Wyse has been a significant operating company under ONEX, and it adheres to their required codes, policies, and disclosure practices.

### GOVERNANCE

Wyse has established a formal governance structure to ensure our policies are operationalized, compliant, and regularly reviewed. Oversight is provided by the from the Board of Directors and executive leadership team. Under the direction of in-house Legal and Regulatory departments, Wyse adheres to the applicable legislation in each jurisdiction where the company operates, including but not limited to the following:

- Measurement Canada
- British Columbia Utilities Commission Act
- Ontario Electricity Act
- Ontario Energy Board Unit Sub-Metering Code
- Ontario Consumer Protection Act
- Electrical Safety Authority
- Canadian Electrical Code

### ACTIVITIES

Wyse is a submetering provider that installs and operates submeters to measure electricity, water, sewer, natural gas and/or thermal energy consumption in individual units of multi-residential buildings, such as apartment rental units and condominium units. This is done downstream of the bulk meter. Wyse has been a service provider in the electricity submetering industry since 2006 in Ontario, since 2016 in British Columbia and Alberta, 2020 in Saskatchewan and Prince Edward Island, 2021 in Nova Scotia and 2024 in New Brunswick.

### SUPPLY CHAINS

Our Tier 1 supply chain consists entirely of Canadian and United States-based suppliers and distributors. In our day-to-day operations, Wyse works with a select group of contractors for meter installation — all of whom are based in Canada, as our clients are exclusively within the Canadian market. Additionally, Wyse also engages other service providers for administrative functions such as human resources and IT, all of which are based in Canada.



## SECTION 4 | POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

### ONEX CODE OF BUSINESS CONDUCT AND ETHICS

As an Onex significant operating company, Wyse’s executive leadership team, representing all of the organization, is required to operate under the *Onex Code of Business Conduct and Ethics*. This code sets forth standards, expectations and obligations for Wyse and its leadership. The code reflects Onex’s commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies that all directors, officers and employees of Onex and its controlled entities are expected to comply with. The code includes clauses covering, but not limited to:

- Avoidance of conflicts of interest;
- The integrity of Onex’s financial records and public disclosure documents;
- Protection of Onex’ assets, including its confidential information;
- Compliance with applicable laws;
- Fair and ethical conduct in Onex’ business dealings; and
- Accountability for compliance.

Wyse is also committed to other Onex policies covering:

- Whistleblower protections;
- Anti-bribery and anti-corruption;
- Sound operational and management practices to ensure facilities are in compliance with all applicable legislation providing for the protection of the environment, employees and the public; and
- Active self-monitoring programs to ensure compliance with government and company policies.

### ADDITIONAL POLICIES AND DUE DILIGENCE

Wyse conducts high-level due diligence throughout the supply chain to proactively identify, address and mitigate potential issues. Below is a summary of the due diligence processes undertaken by Wyse:

- Wyse engaged the services of a third party specializing in risk assessment to help us examine our processes, both existing and developing, specifically related to risks associated with forced and child labour in our supply chains.
- Wyse leadership team began discussions on formalizing policies and processes addressing the mitigation of the risk of child labour and forced labour.



## SECTION 5 | PART OF BUSINESS AND SUPPLY CHAIN THAT CARRY A RISK OF FORCED LABOUR OR CHILD LABOUR AND THE STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

We do not have any issues with our Tier 1 supply chain. Our primary risk centres on the Tier 2 supply chain, specifically the overseas manufacturing element of our Tier 1 suppliers. As such, we are taking the following steps to manage that risk.

### VENDOR MONITORING AND DUE DILIGENCE PROCESS

Wyse is currently developing a vendor assessment processes to address forced and child labour. As a first step, we conducted a survey of our main suppliers and contractors to evaluate their processes for ESG issues, human rights, and forced and child labour within their supply chains. These suppliers and contractors account for more than 70 per cent of our total purchases for 2023. The findings from the survey indicated a low risk of forced and child labour within these supply chains, which will serve as a strong foundation for further risk management.

### VENDOR SUSTAINABILITY INITIATIVES

We have reviewed our suppliers' sustainability initiatives as stated in public declarations. Our review highlighted several key initiatives among our suppliers, including alignment with ESG efforts with the UN Sustainable Development Goals and adoption of ISO 45001, a globally recognized standard for Occupational Health and Safety Management Systems (OHSMS), aimed at ensuring a safe and healthy work environment for employees. The information enables us to engage our suppliers in a more structured manner regarding their objectives to prevent forced and child labour.

### SUPPLIER AGREEMENTS

Wyse maintains detailed supplier agreements with select suppliers and contractors. These agreements outline contractor qualifications, industry practices, and compliance with applicable laws and regulations. However, these agreements do not currently include specific clauses addressing forced and child labour. In 2024, we plan to update these agreements to explicitly mention concerns about forced and child labour.

Additionally, we are considering implementing a formal supplier code of conduct to formalize our expectations with regards to sustainability, including forced and child labour.

## SECTION 6 | ANY MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

No measures have been required, as we have not identified any incidents of forced or child labour in our activities and supply chains.



## SECTION 7 | REMEDIATION OF THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULTS FROM ANY MEASURE TAKEN TO ELIMINATE THE USE OF FORCED LABOUR OR CHILD LABOUR IN ACTIVITIES AND SUPPLY CHAINS

So far, no instances of income loss for vulnerable families have been identified or reported as a result of our measures to eliminate forced or child labor in our activities and supply chains.

## SECTION 8 | TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

In 2023, Wyse did not provide employees with training on the risks of child and forced labour. Wyse will develop and incorporate training for employees within the next twelve months.

## SECTION 9 | ASSESSING EFFECTIVENESS IN ENSURING FORCED AND CHILD LABOUR ARE NOT BEING USED IN OUR BUSINESS AND SUPPLY CHAINS

Wyse engaged the services of a third party specializing in risk assessment to help us examine our processes, both existing and developing, specifically related to risks associated with forced and child labour in our supply chains.

Wyse is committed to addressing the risks and preventing the use of forced and child labour in our business and supply chains. As detailed in previous sections, Wyse has a number of measures to prevent and reduce these risks. However, no actions have been taken to date to assess the effectiveness of these measures.

### APPROVAL AND 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. 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.



**Richard Belfer, CFO**

**May 28, 2024**

**I have the authority to bind Wyse Meter Solutions Inc.**