



## **INTRODUCTION**

This report is issued by Gateman-Milloy Inc. (Gateman-Milloy) pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), covering the period of October 1, 2023, to September 30, 2024. This report has been prepared in accordance with the requirements set out in the act and provides an overview of the actions Gateman-Milloy has taken, and will take, to address the risks of modern slavery, which includes forced and child labour, within Gateman-Milloy’s supply chain.

## **STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN**

Gateman-Milloy is a Canadian controlled privately owned general contractor incorporated under the laws of Ontario, on May 1, 1993. Gateman-Milloy is a major, full-service general contractor who has successfully completed major projects for public and private owners. Gateman-Milloy works exclusively in Southern Ontario providing a range of services to help various clients overcome planning, zoning, and site suitability challenges, site access issues, environmental concerns, municipal planning, and permit processing. Gateman-Milloy has extensive experience in construction and development utilizing the latest technology and techniques to provide innovative solutions for clients, enjoying a healthy working relationship with many leading consultants, architects, land developers, general contractors and municipalities.

Gateman-Milloy is located in Kitchener, Ontario employing approximately 180 employees. This amount fluctuates throughout the year, given the seasonal nature of the construction industry in Southern Ontario, as well as the amount of work on hand at any given time. Gateman-Milloy contracts qualified subcontractors for various projects, all employees, subcontractors and their workers are required to comply with our workplace safety policies and applicable employment standards.

Gateman-Milloy works with over 600 suppliers and subcontractors, importing only from the United States of America for civil construction furnishing. Gateman-Milloy, its President, Executives and Senior Management are committed to fostering a knowledgeable and ethical procurement procedure.

## **STEPS TO REDUCE RISK OF FORCED LABOUR AND CHILD LABOUR**

Gateman-Milloy is developing policies and procedures to mitigate any exposure to forced labour or child labour.

When goods are required to be purchased outside of Canada, Gateman-Milloy receives direction from the owner of the project with whom to purchase goods from. However, divisional managers assess the viability, credibility, and legitimacy of the suppliers before procuring products.

Gateman-Milloy has a long-term, repeat, and ongoing relationship with many of the suppliers and subcontractors.

## **POLICIES AND DUE DILIGENCE**

Gateman-Milloy's risks are low for forced labour and child labour. During the fiscal year covered by this report, 0.2% of Gateman-Milloy's purchases were from vendors located in the United States, the remaining purchases of 99.9% were from Canadian suppliers. All subcontractors working on Gateman-Milloy projects were based in Ontario, Canada.

Gateman-Milloy believes safe work practices to be the centre of preventing risks of forced labour and child labour in the Canadian construction industry, focusing on the safety of workers in our construction activities and collaborating with our subcontractors to ensure compliance with applicable employment standards and safety rules. Gateman-Milloy adheres to provincial employment, human rights and safety standards, including with respect to hours of work, wages, minimum age of employment.

Gateman-Milloy's Company Rules Policy applies to all employees, contractors, and visitors on all properties, leased, owned or maintained, and on any site in which performance of work has been engaged. Gateman-Milloy expects managers, workers and contractors to uphold moral and ethical principles and have zero tolerance for any form of abuse to workers or human rights violations.

Gateman-Milloy's safe work policies and procedures implement health and safety standards addressing the risks of the workplace. Our Health and Safety team and eCompliance system support all workers in performing tasks safely, while training through orientations, education, and inspections. Gateman-Milloy has been awarded the Certificate of Recognition (COR) program in Ontario, which awarded employers who develop health and safety program that meets established provincial safety standards. Gateman-Milloy is audited, on a yearly basis by an independent, certified auditor to maintain COR certification.

## **ASSESSING THE RISK OF FORCED LABOUR AND CHILD LABOUR**

Gateman-Milloy operates exclusively in Southern Ontario and conducts business with long-term reputable suppliers and subcontractors who are responsible for complying with Canadian employment and safety laws. Furthermore, less than 1% of Gateman-Milloy's purchases are outside of Canada. For these reasons Gateman-Milloy has assessed the risk of forced labour and child labour in both operations and direct supply chain to be low. Any forced labour or child labour would be through indirect suppliers. Gateman-Milloy is reviewing risks beyond current operations and direct suppliers, however, policies have not yet been developed to consider the risks of forced labour and child labour and steps to be taken when procuring goods.

## **REMEDATION MEASURES AND REMEDIATION OF LOSS OF INCOME**

Gateman-Milloy's safety practices and policies set expectations ensuring any complaints or concerns of any health and safety violations are heard and adequately addressed to ensure protection of workers rights. If any subcontractors fail to comply with the standards relating to worker's safety, Gateman-Milloy has the right to stop work until corrective action is taken.

Gateman-Milloy's Health and Safety team receives the information regarding violations, established the corrective action to remedy the issue and creates follow up reporting. On a monthly basis this reporting is reviewed by all senior management.

To date, Gateman-Milloy has not identified any incidents relating to forced labour or child labour within the operations or supply chain, and as such has not taken any remediation measures of remediation of loss of income to families because of forced labour or child labour.

## **EMPLOYEE TRAINING**

Gateman-Milloy, its President, Executives and Senior Managers are committed to providing a healthy and safe work environment. All employees are required to participate in training and continual education delivered online through eCompliance and attend on the job meetings regularly. The training outlines Gateman-Milloy's standards, expected conduct and availability to express concerns. To date, Gateman-Milloy has not provided training to employees specifically on the risks of forced labour or child labour in our supply chains.

## **ASSESSING EFFECTIVENESS**

Gateman-Milloy monitors the compliance of all employees and subcontractors with the standards in the Health and Safety system. The Health and Safety team perform regular site visits, updates all required reporting, reviews reports with senior management, provides follow up and feedback to ensure all policies are being adhered to throughout the company.

Except for aforementioned health and safety measures, Gateman-Milloy has not put in place any assessment structures to assess, measure and track the effectiveness of steps taken to prevent or reduce the risks of forced labour or child labour in the supply chain.

## **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 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 listed above.

Dated in the City of Kitchener, Ontario, this 28<sup>th</sup> day of May, 2025.

---

Michael J Milloy  
President  
(I have the authority to bind Gateman-Milloy Inc.)