

May 31, 2025

## **Forced Labour and Child Labour Report**

### **Giusti Group LP (Business Number: 876596800)**

#### **Introduction**

This Report is made by Giusti Group (GP) Ltd. as General Partner for Giusti Group Limited Partnership (collectively "Giusti", "we", "our" or "us"), and has been drafted in alignment with section 11 of Bill S-211 for the financial year ending December 31, 2024.

Giusti meets the definition of a reporting entity under the Act by having a place of business in Canada and doing business in Canada, as well as meeting the criteria thresholds for revenue and assets. Giusti is steadfast in its commitment to upholding honesty and integrity in all its business operations. In alignment with Bill S-211, this report has been prepared to disclose the measures that Giusti has undertaken in the 2024 fiscal year to mitigate the risks associated with forced and child labour within its business framework.

#### **Structure and Business Activities**

Giusti specializes in concrete formwork placement, with services consisting of the construction of multi-family parkade structures, multi-family townhome projects, commercial parkade structures, and high-rise residential / commercial structures throughout Western Canada. Giusti's supply chain predominantly relies on Canadian sources, and while it is an industry not known for high risk for forced and child labour, there is an inherent risk associated with suppliers and contractors within this industry. Giusti has completed an internal assessment of its supply chain and has not identified any obvious indication of forced and/or child labour practices, and to help ensure Giusti is best able to prevent these illegal and reprehensible labour practices from being within its supply chain, the following practices have been established and/or reviewed over the past year:

#### **Supplier Code of Conduct:**

While most of the material supply for our business is from Canadian sources, where forced labour risk is inherently low, and our labour requirements are hired locally and internally; we do engage third party contractors to fulfill labour gaps to ensure that we can provide our services on time to our clients. As such, labour hiring and recruitment poses modern slavery risks with

third-party labour hire contractors due to the lack of visibility over their hiring arrangements. To ensure proper compliance, we have enhanced our procurement process and policy to cause all Subcontractors to acknowledge and comply with a code of conduct that ensures compliance with all applicable local labour laws and regulations.

### **Training**

During the 2024 fiscal year, Giusti did not conduct mandatory in-house training specifically focused on the prevention of forced and child labour within the supply chain. However, we remain fully committed to upholding ethical standards and fostering a culture of vigilance. Procurement is handled by a small group of staff which assists to mitigate the risk as these staff are aware of Bill S-211 and ethical purchasing practice, and when possible, procure all products directly from reputable Canadian suppliers. Should circumstances warrant, our in-house supply chain professionals are prepared to engage proactively, and we are positioned to consult with external industry experts to ensure appropriate action and alignment with evolving best practices.

### **Remediation Measures**

Over the previous fiscal year, we have not encountered any instances of forced or child labour within our operations or supply chains, and consequently, no remedial actions have been necessary. While no occurrences of forced or child labour within our operations or supply chains have been identified, should any arise in the future, we will take action. Acknowledging the intricate nature of supply chains, we are committed to collaborating closely with our suppliers to ensure the effective implementation of remediation measures.

### **Remediation of Loss of Income**

Over the past fiscal year, we have not received any complaints relating to forced labour or child labour in our operations or supply chain, and as such have not taken any remediation measures or remediation of loss of income to families as a result. We will continue to develop a grievance mechanism for employees, contractors, and suppliers to report concerns through to continue to identify potential issues, as well as tracking non-compliance and therefore remediation.

### **Assessing Effectiveness**

Throughout fiscal 2024, we began the process of building the foundation of our modern slavery compliance framework. We will continue this process moving forward, and we will be able to review our due diligence framework and broader processes and procedures to be able to assess their effectiveness and continually improve our modern slavery compliance for future reporting

periods. Giusti remains committed to implementing enhanced due diligence processes as warranted by emerging concerns, regulatory developments, or evolving industry best practices.

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.



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I have the authority to bind  
Giusti Group (GP) Ltd. as General Partner for Giusti Group Limited Partnership

Gildo Giusti

