

Modern Slavery and Child Labor Report

1. Structure, Activities, and Supply Chains

Our business operates as a vertically integrated organization with multiple departments focused on procurement, manufacturing, and maintenance. We are headquartered in Sarnia, Ontario, Canada, with operational branches and production facilities across Canada and the US. Our supply chain includes both domestic and international partners, with raw materials sourced from Canada and the US, manufacturing processes in Canada.

Our operations involve the procurement of raw materials, production of finished goods, packaging, and distribution. The supply chain extends from Tier 1 suppliers (direct suppliers) to Tier 3 and beyond, involving subcontractors, raw material providers, and logistics partners.

2. Policies and Due Diligence Processes

We have a comprehensive Human Rights and Ethics Policy that prohibits all forms of forced labor, child labor, and human trafficking. This policy is communicated to all suppliers and is a mandatory part of our supplier agreements.

Our due diligence process includes:

- Supplier onboarding assessments, including labor practices reviews.
- Annual self-assessment questionnaires on human rights compliance.
- Regular third-party audits focusing on labor rights, working conditions, and age verification processes.
- Grievance mechanisms accessible to workers throughout our supply chain.

We require all suppliers to comply with the International Labour Organization (ILO) conventions and local labor laws. Non-compliance results in remedial action plans, and repeat violations may lead to termination of the business relationship.

3. Risk Assessment

We have identified the following areas in our supply chain as carrying a heightened risk of forced or child labor:

- Our risk assessment did not identify any supply chain entity that posed a risk.

To assess and manage these risks, we:

- Conduct regular risk mapping using third-party data and country risk indices.
- Prioritize high-risk suppliers for audits and site visits.
- Collaborate with local NGOs and labor organizations to gain on-the-ground insights.
- Train procurement teams to recognize and report warning signs of labor abuses.

4. Remediation Measures

Where risks or instances of forced or child labor are identified, we implement the following measures:

- Immediate engagement with the supplier to cease the offending practices.
- Development of corrective action plans with clear timelines and support mechanisms.
- Funding and supporting third-party programs that provide education and income alternatives for vulnerable families.
- Collaboration with child protection agencies to ensure the safe reintegration of affected children into school systems.
- Ongoing monitoring to ensure compliance and prevent recurrence.

Our approach emphasizes prevention, immediate intervention, and long-term support to affected individuals and communities.