



Bill S-211 – Forced Labour and Child Labour in Supply Chains Act

Structure, Activities, and Supply Chain

Structure

OMNI PRECAST Inc. (OMNI) is an Ontario Corporation located at 2691 Greenfield Road in Ayr, Ontario, Canada. OMNI operates solely in Ayr, Ontario, Canada and has approximately 95 employees. The fiscal year is January 1 – December 31. The information contained in this report reflects the year ended December 31, 2024.

OMNI does not control any subsidiary companies.

Activities

OMNI PRECAST manufactures and supplies safe and sustainable precast concrete products for the development of communities across Ontario.

Supply Chain

OMNI sources raw materials and goods used in the production and sale of precast concrete through a supply chain that is primarily based in Ontario, Canada. During 2024 approximately 94% of the goods purchased to be used in the production of precast concrete come from Ontario, Canada.

Policies and Due Diligence Processes

OMNI has the following policies in place that are relevant to this act:

Workplace Harassment and Violence Policy

OMNI's workplace harassment and violence policy is designed to ensure a safe and respectful work environment for all employees. The policy outlines the company's commitment to preventing and addressing harassment and violence in the workplace, including physical, verbal, and psychological abuse. It covers procedures for reporting incidents, conducting investigations, and implementing corrective actions. OMNI emphasizes the importance of confidentiality, non-retaliation, and support for affected employees, fostering a culture of respect and safety within the organization.



Human Rights Policy

OMNI's Human Rights policy ensures that every individual has the right to freedom from discrimination. As an equal opportunity employer, OMNI prohibits discrimination based on race, ancestry, place of origin, color, ethnic origin, citizenship, creed, marital status, sex, sexual orientation, family status, handicap, age, and record of offenses. The policy strictly forbids actions, words, jokes, or comments based on these protected grounds. Employees are encouraged to report any incidents of harassment or discrimination to management without fear of reprisal, with all reports handled confidentially and promptly. Additionally, OMNI is committed to accommodating disabled or handicapped persons to the best of its ability.

Illegal Labour Policy and Code of Conduct

OMNI's Illegal Labour Policy and Code of Conduct outlines our commitment to prohibiting illegal labour practices within our organization. It applies to all employees, contractors, subcontractors, vendors and any other individuals or entities engaged in work for OMNI (collectively Related Party). The use of illegal labour, including but not limited to child labour, forced labour, and any form of human trafficking, is strictly prohibited. Any Related Party found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment or contract. This policy will be reviewed annually and updated as necessary to ensure ongoing compliance with applicable laws and regulations.

Due Diligence

OMNI has implemented processes to mitigate the risks of human right violations and instances of forced and child labour within operations and the supply chain. Currently, there is no formal vendor review process that specifically targets forced child labour, OMNI takes the enforcement of the Illegal Labour Policy and Code of Conduct with staff and vendors. Any violation is to be immediately escalated to senior management and corrective actions will be promptly administered, leading to a possible removal of activities with the offending party.

OMNI has maintained long standing relationships with many vendors, OMNI has zero encounters with issues surrounding forced or child labour with any vendors to date.

Risk Identification and Mitigation

Countries of Operation and Associated Risk

OMNI operates solely in Ontario, Canada. Employees of OMNI are residents of Ontario, Canada. OMNI strictly follows the labour laws set out in Canada.

OMNI does not procure goods from at risk countries, or countries that do not have labour laws protecting forced labour or child labour.



Of the approximately 6% of goods procured for manufacturing, goods that came from outside of Canada in 2024 were procured from the following states in the United States of America:

- Delaware
- Indiana
- Iowa
- Maryland
- South Carolina
- Tennessee

OMNI mitigates the risks of forced labour and child labour by purchasing goods primarily from Canada where there are strict laws against forced labour and child labour. For goods purchased outside of Canada, goods are procured from states (USA) that have strict forced labour and child labour laws.

It is the assessment of OMNI PRECAST that there is no risk of forced labour or child labour that faces the organization due to the protections provided by these laws.

Mitigating Activities

Supplier Monitoring

OMNI monitors suppliers in two ways, 1) signed statement from vendors, and 2) periodic site visits. Signed statements from vendors are distributed annually and require the vendor to confirm that they are a) aware of Bill S-211, Fighting Against Forced Labour and Child Labour in the Supply Chains act, and b) that to their knowledge, they are not involved in any activities, including but not limited to, procurement and/or contracts with sellers that have risk of engaging with forced or child labour. Periodic site visits happen during the normal course of business, these visits are generally due to business purposes but provide OMNI with the opportunity to inspect vendor sites and reasonably confirm that there are not activities related to forced or child labour.

Remediation Measures

Income Loss

OMNI has not encountered any instances of Forced or Child Labour. As this process and commitment to the Supply Chains Act continues to involve, so does OMNI's attention towards remediation where appropriate. To date no instances of forced or child labour have been encountered, therefore no remediation has been required in respect to forced or child labour.



Training

All employees of OMNI are provided with the Illegal Labour Policy and Code of Conduct, outlining that OMNI is firmly opposed to any forced or child labour. This policy is part of the onboarding process, and has been distributed to all existing employees. Senior management is responsible for the distribution of this policy and ensuring that all employees are kept up to date with any and all developments.

Assessing Effectiveness

OMNI is continuously reviewing how to best approach eliminating the risk of child or forced labour. The steps taken are as follows:

- Internal Policies – through creating robust internal policies, including Workplace Harassment and Violence Policy, Human Rights Policy, and Illegal Labour Policy and Code of Conduct, OMNI has provided clear direction to staff on the seriousness of these matters and has included clear guidelines on how to react to any occurrences.
- Due Diligence – OMNI contacts all suppliers annually to confirm awareness and commitment to the elimination of the risk of forced and child labour.
- Supply Chain Monitoring – OMNI’s supply chain is reviewed annually to assess any risks that may exist in the supply chain.
- Risk Identification and Management – OMNI focuses its efforts on mitigating potential risks and compliance with existing labour laws through continuous development of risk assessments on regions and countries that are dealt with.
- Awareness Training – development of a robust policy that has been distributed to employees and is included in the onboarding process ensures that OMNI’s staff are educated on the risk of exploitation of vulnerable individuals through forced and child labour practices.



RE: Attestation on report - Bill S-211 –Forced Labour and Child Labour in Supply Chains Act

The contained report is for OMNI PRECAST Inc. for the calendar year ended December 31, 2024.

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.

Name Timothy Alexander

Title Controller

Date May 30, 2025

Signature 

I have authority to bind OMNI PRECAST Inc.