



VAST INDUSTRIAL CORP.

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353 Dufferin Ave. London, ON N6B 1Z5

## FORCED LABOUR AND CHILD LABOUR PREVENTION STATEMENT

Reporting Year Ending December 31, 2024

*This statement is made in accordance with the  
Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)  
on behalf of Vast Industrial Corp and its subsidiaries for the reporting year ending December 31, 2024*

Vast Industrial Corp operates in the manufacturing sector through subsidiaries across Ontario. The company designs, manufactures, and distributes industrial and mechanical components. Our supply chains involve sourcing raw materials, fabricated parts, and assembly equipment from both domestic and international suppliers, with key sourcing regions including North America, Europe, and Asia. The company's strength lies in the skill, dedication, and expertise of its employees. Our diverse team brings experience across various disciplines, allowing us to deliver high-quality products and value-driven service to our customers.

Vast Industrial Corp and its subsidiaries are committed to full compliance with all applicable local, national and international laws, regulations and policies, including those that relate to the prevention of child labour, modern slavery and human trafficking. We operate under a Code of Conduct that outlines our expectations for legal and ethical business practices, including compliance with employment laws and responsible supplier engagement. The Vast Group of companies strive to conduct business that is morally, legally, and ethically sound in everything it does, and in turn we expect the same from all our suppliers.

Modern slavery, including forced labour, child labour, and human trafficking, are serious crimes and gross violations of human rights. Vast Industrial Corp and its subsidiaries maintain a zero-tolerance approach to all such practices. We are committed to implementing, maintaining, and enforcing effective systems and controls to ensure that forced labour, child labour, and human trafficking are not taking place within our own operations or those of our supply chains.

In support of this commitment, Vast Industrial Corp has implemented a suite of internal policies, including:

- Supplier Code of Conduct
- Employee Code of Ethics
- Procurement Guidelines
- Whistleblowing Policy

These policies establish clear standards for ethical conduct and responsible sourcing. Our Whistleblowing Policy provides a confidential mechanism for employees and third parties to report suspected breaches of company policy, including concerns related to forced or child labour.

In 2024, Vast Industrial Corp conducted a risk assessment across its supply chain and identified several elevated risk areas for potential exposure to forced labour and child labour. These included geographic sourcing from Southeast Asia, where labour enforcement may be inconsistent; subcontracted fabrication where our direct oversight is limited; and the use of labour recruitment intermediaries in select countries, where unethical recruitment practices can increase worker vulnerability. In response to these findings, the company implemented enhanced vendor screening and due diligence procedures, requiring suppliers in high-risk regions to provide greater transparency regarding their





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employment practices and supply chain controls. Additionally, targeted training was delivered to purchasing personnel to strengthen their ability to identify risk indicators, uphold ethical sourcing standards, and take appropriate action if concerns arise. These steps form part of our broader effort to foster a responsible, transparent, and human-rights-focused supply chain.

Vast also ensured in 2024 that Targeted training was delivered to 100% of employees involved in supply chain, procurement, and vendor management, as well as to all new employees in the manufacturing subsidiaries as part of their onboarding process. This training focused on identifying risk factors related to forced and child labour, understanding the company's internal reporting procedures, and recognizing the broader global context and implications of modern slavery within supply chains.

Vast Industrial Corp did not uncover any confirmed cases of forced or child labour in 2024. However, the company remains prepared to take immediate corrective action should concerns arise. Such actions may include the suspension or termination of supplier relationships, reporting incidents to the appropriate authorities, and engaging third-party auditors to conduct independent investigations where necessary.

We assess the effectiveness of our program through a combination of measures designed to ensure ongoing compliance and continuous improvement. These include administering supplier compliance questionnaires and securing formal attestations of adherence to our labour standards; maintaining audit readiness through random checks of supplier documentation; and conducting internal annual reviews to evaluate adherence to company policies and the effectiveness of employee training initiatives. These efforts help us monitor progress, identify gaps, and strengthen our overall approach to preventing forced and child labour in our operations and supply chains.

Vast Industrial Corp and its subsidiaries will continue their efforts to ensure that lawful and ethical treatment of people prevails throughout their supply chains. Accordingly, The Vast Group has monitored and will continue to monitor the changing landscape to ensure new and/or increased risks are identified and addressed.

This statement is made by Vast Industrial Corporation under authority of the Board of Directors as at year end 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.*

*I have the authority to bind Vast Industrial Corp.*

Name: Mark Heisz

Title: Owner

Date: May 1, 2025





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*I have the authority to bind Vast Industrial Corp.*

Name: Doug Hamilton  
Title: Owner  
Date: May 1, 2025

*I have the authority to bind Vast Industrial Corp.*

Name: Alex Heisz  
Title: EVP  
Date: May 1, 2025

*Vast Group of Companies subject to the application of section 54(1) of the Modern Slavery Act 2015:*

Company Name	Country	BN
VAST Industrial Corp.	Canada	792 855 298
Vast Steel Industries Inc.	Canada	706 395 878
Vast Steel Storage Products Inc.	Canada	842 013 328
Dasco Storage Solutions Ltd.	Canada	101 274 215
Secure Western Storage Inc.	USA	47-4870093
M1 Secure Storge Systems Inc.	USA	38-3929668
Data-Link Associates Inc.	USA	11-2607256
Athena Healthcare Products Inc	Canada	739 249 878
2484619 Ontario Ltd.	Canada	802 093 765
Canada Stampings Ltd.	Canada	874 803 752
Unilux Hvac Industries Inc.	Canada	706 019 734
Unilux VFC Corporation	Canada	851 002 238
Unilux Home Comfort For Life Inc.	Canada	714 701 331
Unilux RFC Inc.	Canada	767 261 886
Stratus Metro Building Systems Inc.	Canada	739 941 672
Unilux HVAC USA Inc.	USA	37-1983040

Integrity Action (Whistleblower)

Hotline 1-289-224-3632 or [integrity@vastindustrialcorp.com](mailto:integrity@vastindustrialcorp.com)

