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## **Subject:** Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This report outlines the approach and initiatives by Vicwest Inc to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing on Jan 1, 2024 and ending Dec 31, 2024.

Vicwest is committed to conducting business activities in a responsible and ethical manner with integrity and expects the same high standards of its contractors, suppliers and other business partners.

### **Structure, Activities and Supply Chains**

Vicwest Inc., business number 10258 1931 RC0008, having been established in 1930, does business as Vicwest with our head office located in Burlington, Ontario. With six manufacturing facilities located in British Columbia, Alberta, Saskatchewan, Ontario, Quebec, Prince Edward Island and offices in Ontario and New Brunswick, Vicwest is a leading manufacturer of metal roofing and wall systems as well as a distributor of various building products to the Canadian and USA construction industry.

As an independent business unit of Kingspan Group PLC, Vicwest has 427 employees located across all facilities.

While greater than 98% of raw materials, distributed goods and services are sourced from Canada and the United States of America, Vicwest does procure products from multiple countries across the globe, including Switzerland, Slovenia, Finland, China, and South Korea.

### **Policies and Due Diligence Processes**

Vicwest has several policies in place which include the [Kingspan Code of Conduct](#). The code links our success to behaviours and aspirations to maintain a culture where everyday actions are built on five core principles which include:

- Clear, ethical and honest business communications
- Compliance with the law
- Respect for safety and wellbeing of colleagues
- Protection of group assets
- Upholding our commitment to a more sustainable future

Vicwest has implemented the [Kingspan Human Rights Policy](#) which articulates our commitment to upholding and promoting human rights principles and values in all aspects of our operations. We recognise that human rights are universal and indivisible. The policy includes:

- Implementation
- Our Approach



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- Human Rights Risks
- Access to Remedy
- People Passionate
- The Future

In late 2022, Vicwest implemented the [Kingspan Supplier Policy](#) across multiple suppliers in their supply chain. The Kingspan Supplier Policy sets out expectations of Suppliers, generally in terms of business practices, and specifically with respect to:

- Business integrity
- Ethical employment practices
- Anti-Bribery and Corruption
- Environmental Responsibility

With respect to Forced Labour and Child Labour, the policy expects suppliers to observe the International Bill of Human Rights and suppliers are expected to support Vicwest's commitment to respect human rights through:

#### Child Labour

- Vicwest is guided by the International Labour Organization Core Conventions, and as such requires its suppliers not to utilize any form of child labour in their business operations.

#### Forced Labour (Anti-Slavery)

- Suppliers are required to ensure that all working relating operations is completed voluntarily and without slavery, servitude, forced or compulsory labour or human trafficking. Workers shall have the freedom to terminate their employment with the respective supplier at any time without penalty, upon giving reasonable notice.

To support the Kingspan Supplier Policy and a means of implementing a due diligence process, Kingspan and Vicwest engaged with [Ecovadis](#), an online provider of business sustainability ratings, intelligence and collaborative performance improvement tools for global supply chains. The online platform provides actionable sustainability scorecards which provide detailed insight into environmental, social and ethical risks across 220+ purchasing categories and 180+ countries.

In the event that a supplier did not wish to participate in the Ecovadis platform, Vicwest required suppliers to sign and acknowledge the Kingspan Supplier Policy.

In 2024, further due diligence processes were implemented, including supplier risk evaluations to ensure suppliers complied with the Kingspan Supplier Policy.



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### **Forced Labour and Child Labour Risks**

In 2024, Vicwest participated in the launch of a Kingspan Group led initiative to integrate due diligence into supply chain policies and procedures. As part of this initiative, the process of identifying risk in supply chains with regards to forced labour and child labour was implemented at Vicwest.

### **Remediation Measures**

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

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

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

### **Training**

All employees are required to review and acknowledge annually our Code of Conduct and Human Rights policies.

### **Effectiveness**

As part of the Ecovadis platform, Labour & Human Rights is one of four measures scored and monitored. Each supplier participating in the platform must indicate whether the supplier has issued a Labour and Human Rights policy specific to child labour, forced labour and human trafficking with qualitative objectives/commitments which specifies the efforts to be made by the supplier to eradicate the occurrence of child labour, forced labour and human trafficking. Ecovadis scores are based on a yes/no basis and then assigned a high/medium/low priority which are reviewed by Vicwest annually.

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31, 2024. It has been issued on behalf of Vicwest Inc and approved by Gavin Blower (Vicwest Inc Officer).

Signed.

A handwritten signature in black ink, appearing to read "Gavin Blower".

Gavin Blower  
President, Vicwest Inc  
17-Apr-2025