



# 2024 Annual Report

Combating Forced and Child Labour in Canada

Western Mechanical Electrical Millwright Services Ltd.  
Barrie, Ontario, Canada

This is a Statement of Western Mechanical Electrical Millwright Services Ltd. (the “Company”) for the fiscal year ended October 31, 2024.

The statement is made pursuant to *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). It sets out actions taken place by Western Mechanical Electrical Millwright Services Ltd. (“Western Mechanical”) during the financial year ended October 31, 2024 to prevent and reduce the risk of forced labour and child labour from occurring within the Company’s business and supply chains.

## 1 COMPANY STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

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### 1.1 STRUCTURE

Western Mechanical is an industrial contracting corporation operating out of Barrie, Ontario, Canada since 1979. At fiscal year end October 31 2024, Western Mechanical employed 304 employees in Canada.

### 1.2 ACTIVITIES

Western Mechanical provides industrial contracting services across Canada in areas that include mechanical contracting, electrical contracting, millwrighting, civil contracting, heavy lifting, and heavy transportation. Using a wide array of equipment in conjunction with our years of experience in the industry, Western Mechanical fulfills our obligations to our customers using the highest of safety standards. Western Mechanical also uses a variety of tools and materials in the completion of our obligations to our customers, all of which can be sourced from locations around the world.

### 1.3 SUPPLY CHAINS

As previously stated, Western Mechanical uses a variety of materials, tools, and specialized equipment in our daily business operations. These items can be sourced from many different locations across the globe. This creates a broad supply chain for Western Mechanical, along with some associated risks in terms of the use of forced labour and child labour. As Western Mechanical is not responsible for the production, manufacturing, extraction, or processing of these goods, it is not always simple to determine the level of risk that comes with the use of these goods, although steps are taken to either mitigate these risks or counteract the adverse impacts of our supply chain, through the use of a screening process of our suppliers. This is to ensure our suppliers align with our core values and business practices.

Western Mechanical's supplier list is extensive, with suppliers based around the globe, although many of them reside in Canada. As well, several of our purchases are recommended by our customers, many of which are government agencies.

## 2 POLICIES AND DUE DILIGENCE PROCESSES

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One of Western Mechanical's main priorities in our business operations is employee safety and well-being. While we cannot fully control the policies and business practices of our suppliers, we strive to do our due diligence by providing a workplace where employees are treated with dignity and respect. This is a product of our core values as a company and policies that are put in place by senior management, as we ensure responsible business practices are a part of our day-to-day operations. These practices include, but are not limited to:

- Identifying and assessing adverse impacts in operations, supply chains, and business relationships.
- Ceasing, preventing, or mitigating adverse impacts.
- Tracking implementation and results.
- Communicating how impacts are addressed.
- Providing for or cooperating in remediation when appropriate.

We believe that this is the responsibility of all of our managers, supervisors, employees, contractors, subcontractors, visitors, and suppliers to engage in strong ethical behaviour of mutual respect and tolerance.

Along with our business practices, Western Mechanical has implemented an Anti-Forced Labour and Anti-Child Labour policy, which is aligned with our company's Code of Conduct and Health and Safety policy. This is given to all employees of the Company and is enforced by senior management and expected to be adhered to in all aspects of the business.

Western Mechanical is also committed to continuous reassessment of policies associated with employee safety and well-being, with reassessments being made on an annual basis at a minimum. This is in conjunction with our open-door policy, where all employees are encouraged to share their questions, suggestions, concerns, or complaints with management.

Western Mechanical has built a company culture that encourages strong relationships between all members of the team, in conjunction with treating each team member with respect. This helps ensure that no employee feels undervalued and that everyone feels that they are an important piece of the team. As well, Western Mechanical recognizes the need to take every precaution to protect the environment around us. This is done through communication, education, and site audits to ensure we meet our environmental targets and objectives.

These values and policies allow us to do our due diligence and ensure we are building and maintaining a community that is beneficial for everyone.

### 3 FORCED LABOUR AND CHILD LABOUR RISKS

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Western Mechanical's activities do not create any risks that are associated with the use of forced labour and child labour, as we control the labour used in our daily business activities, all of which is unforced. Western Mechanical also does not employ children.

As previously mentioned, Western Mechanical's list of suppliers can be exhaustive, with many goods and equipment that are used in our projects being manufactured in various parts of the globe. Western Mechanical is not responsible for the manufacturing, production, extracting, or processing of these goods,

as we are often the intended end users of these products. This creates certain risks surrounding the use of child labour and forced labour, as the production processes for our equipment and materials remain somewhat unknown. However, many of our purchases are recommended by our customers, many of which are government agencies. Western Mechanical also outsources some of its labour through the use of subcontractors on some of our jobs, although a majority of our subcontractors reside in Canada.

Western Mechanical uses several processes to assess these risks by analyzing who we do business with and what their business practices are. We choose to align ourselves with businesses who share our values when it comes to employee safety and treatment, to ensure that we are creating positive and safe work environments for all persons in our supply chains. This however does not remove all risks associated with the use of forced and child labour.

## 4 REMEDIATION MEASURES

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Western Mechanical attempts to remediate any adverse impacts of our activities and our supply chains through several preventative measures. This includes, but is not limited to:

- Ensuring that all employees of Western Mechanical are fairly treated and provided a work environment where all individuals feel respected.
- Working closely with many labour unions and employing many unionized labourers which helps counteract any adverse impacts in our supply chains. This relationship certifies no human rights violations are taking place.
- Open communication between all team members, from management to labourers, to allow any grievances to be immediately addressed and remediated directly.
- Make sure our policies regarding employee safety and well-being are easily accessible to all stakeholders.
- Follow all legal procedures according to the Employment Standards Act when it comes to employee treatment and well-being.

Western Mechanical believes we must make certain no human rights are being infringed upon, and that all stakeholders of our business activities and supply chains are not adversely impacted.

## 5 REMEDIATION OF LOSS OF INCOME

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Given the measures Western Mechanical has taken to remediate any negative impact of our activities and supply chains, we have judged that vulnerable families have not experienced a loss of income.

## 6 TRAINING

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Western Mechanical has completed the process of offering an Anti-Forced Labour and Anti-Child Labour e-learning module named the *Forced Labour & Human Trafficking Training*. This training course has been

taken by members of the senior management team, through the Canadian Commercial Corporation, which offers a TRACE International training certificate upon completion. This has been offered to raise awareness of forced labour and child labour and to ensure that steps are taken at all levels of the business to mitigate any adverse impacts within our supply chain.

## 7 ASSESSING EFFECTIVENESS

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Western Mechanical currently has taken some action to assess our effectiveness in preventing and reducing risks of forced labour and child labour in our activities and supply chains. However, policies and procedures in regard to the prevention of forced and child labour have now been added to our current supplier screening process. This will be followed by new policies and procedures to assess our effectiveness in these actions.


In accordance with the requirements of the Supply Chains 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.

Signed by the President of Western Mechanical Electrical Millwright Services Ltd.

Signed: 

Peter Duivenvoorden  
President/Owner  
Western Mechanical Electrical Millwright Services Ltd.

Date: May 29, 2025

<b>Western</b> 	<b>WESTERN-HR-002</b>	<b>Effective Date: May 16, 2025</b>
	<b><i>Forced and Child Labour Policy</i></b>	
<b>Cycle: 1, Version: 1</b>	<b>Document Controller: Senior Management</b>	<b>Page 1 of 1</b>
<b>Developed By: Sarah Lawlor, &amp; Connor Newbold</b>		<b>Date: May 7, 2025</b>
<b>Reviewed By: Doug Dinniwell</b>		<b>Date: May 9, 2025</b>
<b>Approved By: Peter Duivenvoorden</b>		<b>Date: May 16, 2025</b>

## PURPOSE

Western Mechanical Electrical Millwright Services Ltd. is committed to upholding human rights and labour standards in our workplace. Western prohibits child labour and forced labour in all business operations.

## STATEMENTS OF BELIEF

### Child Labour

Western Mechanical Electrical Millwright Services Ltd. will not engage in or support the use of child labour, and will not tolerate the use of child labour in any level of our supply chain. We will not employ individuals below legal working age, as defined by the laws and regulations, or under the age of 15, whichever is higher.

### Forced Labour

Western Mechanical Electrical Millwright Services Ltd. will not engage in any form of forced labour, and will not tolerate the use of forced labour in any level of our supply chain. We believe that the choice to work must be a voluntary choice in all circumstances.

## RESPONSIBILITIES

Western Mechanical Electrical Millwright Services Ltd. and our Suppliers must:

- Ensure employees are aware they may terminate their employment at any time.
- Ensure all employees meet the applicable minimum working age requirements.
- Ensure hours of work, wages, and overtime pay are in compliance with all applicable legislation, and collective agreements.
- Encourage workers to report any suspected violation regarding forced labour.
- Ensure workers have not been required to surrender any government issued ID such as passports or work permits as a condition of employment.



May 16, 2025

Peter Duivenvoorden (President)

[Date]

[On behalf of Senior Management]