



## JOINT FORCED LABOUR AND CHILD LABOUR REPORT

**Reporting Period:** January 1, 2023 to December 31, 2023

### Reporting Entities

This joint report (“**Report**”) is prepared to address the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”) for: Brandsafway Group, Inc. (“**Brand**”, the “**Company**”, “**our**” or “**we**”) and those entities set out in Schedule “A” attached hereto (each, a “**Reporting Entity**” and collectively, the “**Reporting Entities**”).

The Report outlines the steps taken by the Reporting Entities during their previous financial year (the “**Reporting Period**”) to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. Brand Energy & Infrastructure Services UK, Ltd., an affiliate of Brand, is a reporting entity under the UK *Modern Slavery Act 2015*.

### Steps to prevent and reduce risks of forced labour and child labour

In summary, we took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains, as more fully described in this Report:

- Reviewed and updated our Global Supplier Code of Conduct (“**GSCOC**”) in 2023.
- Ensured adherence to GSCOC was included in all standard vendor contracts and purchase orders.
- Implemented our Third Party Due Diligence Policy and related risk-based due diligence.
- Enhanced ethics hotline for increased accessibility for employees and third parties to report concerns with local, toll-free telephone numbers and local language speakers, QR codes for mobile intake reporting, and user-friendly website in 14 languages with 24-hour access.
- Appointed a Chief Sustainability Officer in 2023 who oversees a global, cross-functional environmental, social, and governance (ESG) taskforce. The ESG taskforce reports to an internal Risk & Compliance Committee who reports to the Audit Committee and the Nominating and Corporate Governance Committee of the Board of Directors.

## **Structure, activities and supply chains**

### *Structure and Activities*

Brand is a corporation existing under the laws of Alberta. Brand's primary Canadian operating subsidiaries and affiliates have head offices based in Calgary, Alberta and Bolton, Ontario, with operations, through its subsidiaries, across Canada.

The Reporting Entities provide multi-craft services in the construction industry, including scaffolding, forming, shoring, refractory, insulations, labor, and equipment rental and sales (items including products such as suspended scaffolding platforms, hoists, mass climbers, construction elevators). The principal place of operations of each Reporting Entity is Canada.

### *Supply Chains*

The Reporting Entities have a direct relationship with many end manufacturers of equipment, and a two or three tier down relationship with suppliers of other direct and indirect materials, goods, services and labour.

The Reporting Entities purchase from a number of sources, many with Canadian companies which is preferable for the management of processes and policies, but a number of suppliers are also located internationally, including in China, India, the United States, United Kingdom and European Union countries.

## **Policies and due diligence processes**

In order to help prevent forced labour and child labour in its supply chain, the Reporting Entities have in place the following safeguards:

- As part of the Procurement Process, a Risk Map identifies the areas which require more dynamic reviews. Brand works with our Supply Chain partners to ensure a full understanding of their responsibilities which includes a responsibility to take action to prevent forced labour and child labour.
- Supply Chain partners and their direct supply chain are asked to acknowledge acceptance of Brand's GSCOC, either through contractual terms or in a separate written acknowledgment, which is applicable for any company supplying goods or services.
- Due diligence forms part of the Brand accreditation process, these documents set out the standards of not only HSE and Quality but also include, Sustainability and Ethics, including the use of labour and adherence to relevant country legal requirements.
- Contracts are reviewed to ensure under the ethics-related section therein, that the supplier should ensure as much as possible that forced labour and child labour are not taking place in their own supply chain. Brand's standard contract terms prohibit suppliers from taking certain actions, including human trafficking and forced labor. Any breach of such requirement provides Brand the right to immediately terminate or suspend performance of any contract or agreement.
- Regular Audits take place at high risk manufacturers located outside the UK/EU to ensure no persons working within their facilities are subject to mistreatment, have safe and fair working conditions, receive the minimum wage for the country of work and have

adherence to the countries legal working practices. Brand asks them to look at the risks within their own supply chain, which includes the risks posed by forced labour and child labour, as part of the initial and ongoing accreditation process. The Company expects that these suppliers can actively manage these risks through the use of their own policies and procedures.

The Reporting Entities' applicable governance policies and practices are disclosed through their sustainability and internal policies and include:

- **Global Code of Conduct:** Applies to all employees and, together with other policies, establish our expectation of ethical conduct, honest behavior and respect for one another. The Code of Conduct is intended to apply to a wide range of circumstances. As explained in the Code of Conduct, Brand believes in its role as a good corporate citizen and expresses its support for fundamental human rights and its commitment to avoid business practices that abuse human rights, including illegal discrimination and human trafficking. The Code of Conduct is available at <https://brandsafway.com/who-we-are#code-of-conduct>.
- **Global Supplier Code of Conduct (GSCOC):** Outlines our expectations that its suppliers comply with applicable laws and regulations of the countries in which Brand does business. We expect our suppliers to conduct business with honesty and integrity, and to share in our values as outlined in this GSCOC. Specifically, the GSCOC prohibits suppliers from using or benefitting from any form of human trafficking or modern slavery, including forced or compulsory labor or any other form of involuntary labor or service which is extracted from any person under coercion, harassment, the menace of any such penalty such as the use of physical punishment, confinement or threats of violence as a method of discipline or control as defined by the International Labour Organization (ILO). Any failure to comply with these requirements may jeopardize a supplier's relationship with Brand, including potential termination or cancelation of orders or contracts. The GSCOC is available at <https://brandsafway.com/suppliercodeofconduct>.
- **Human Rights Policy:** Guided by international human rights principles encompassed by the UN Guiding Principles, this global policy outlines Brand's support for fundamental human rights and its commitment to avoid business practices that abuse such rights. It is Brand's policy to respect and promote the human rights within the communities in which it operates.
- **Third Party Due Diligence Policy:** Requires risk-based due diligence of all third parties with whom Brand conducts or intends to conduct business. The processes identify and preclude business interactions with person and entities with whom Brand is prohibited from doing business under any applicable government sanctions list, restricted party list or any anti-corruption or anti-bribery law or regulation.
- **24/7 Ethics Hotline:** Service available 24 hours a day, 7 days a week, for reporting suspected ethical misconduct. Brand prohibits retaliation, and all information is submitted on a confidential basis. The ethics hotline is maintained by a third-party provider and available online at <https://brandsafway.ethicspoint.com>.

All of the above policies are available, in whole or in part, at <https://brandsafway.com/integrity>.

The Reporting Entities also have various other policies relevant to addressing the risk of forced labour or child labour in our business and supply chains, including a Global Whistleblower Protection Policy, Global Open Door Policy, and Canadian Policy Against Harassment, Discrimination & Retaliation.

## **Forced labour and child labour risks**

The Reporting Entities continuously strive to achieve excellence with respect to our contracting practices because we believe that adequately compensated and trained workers, operating in fair working conditions deliver high-quality products and services. We believe that the risk of forced labour or child labour within the majority of our third-party vendors is low. This assessment is based on the regulated industries in which they operate and the skill of the professionals providing such services. However, we acknowledge that, to a lesser extent, we engage with suppliers who may be considered higher risk in terms of forced labour or child labour, including suppliers operating in Asia and South America and specific countries generally considered higher risk, including China, India and Pakistan. Where we consider a supplier to be higher risk in terms of forced labour or child labour, we have a supplier facility audit process which incorporates certain questions based on the ISO 26000:2010 standard. We recognize that each of our suppliers has its own supply chain, and our vendor assessments consider this risk where appropriate and possible. We currently have limited visibility of these extended supply chains, excluding projects where subcontractors or materials require our approval.

## **Remediation measures**

Where possible, we will seek to use our influence to resolve any identified concerns.

## **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**

Brand provides training to employees on human rights, including specific training regarding how to identify, prevent, and report forced labour or child labour, through in-person trainings, e-learning, and monthly compliance communications.

## **Assessing effectiveness**

The Reporting Entities acknowledge that forced labour or child labour are possible risks within our operations and supply chain. We undertake various steps to address these risks in our business, including reviewing our policies and business practices to ensure they reflect our commitment to:

- Implementing and enforcing effective systems and controls designed to reduce the risk of forced labour or child labour in our business and supply chains; and
- Transparency through our disclosure obligations.

We monitor and assess the effectiveness of our oversight program through:

- Regular engagement and feedback from key stakeholders, including through active promotion of our reporting 24/7 Ethics Hotline; and
- Operational risk and mitigation plan reporting to the relevant boards and senior executives.

**Authority of Report**

This Report was approved by the board of directors of Brand, on its own behalf, and on behalf of the other Reporting Entities as their direct or indirect controlling entity on May 24, 2024, pursuant to section 11(4)(b)(ii) of the Act.

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 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.



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Name: Steve Wilson

Title: Director of Brandsafway Group, Inc.

I have the authority to bind Brandsafway Group, Inc.

**SCHEDULE "A"**  
**REPORTING ENTITIES**

1. Noxxent Inc.
2. Jamco Construction Inc.
3. AlumaSafway, Inc.
4. Aluma Systems Inc.
5. Alliance Refractories Ltd.
6. Aluma Systems (B.C.) Ltd.