

Forced Labour Report for Whitemud Ironworks Limited

About This Report

This report consists of the first report prepared by Whitemud Ironworks Limited pursuant to Canada's new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").

This report has been prepared for the calendar year ended August 31, 2023.

Structure

Whitemud Ironworks Limited was incorporated in 1989 under the Business Corporation Act. We have been fabricating and erecting structural steel in Western Canada for over 35 years. We are a family-owned and operated company. Whitemud Ironworks Limited is a fully integrated steel fabricator and erector that specializes in structural and miscellaneous steel projects in the commercial sector. From our modern fabrication facilities, in-house engineers and drafting to our local construction crews, the integrated divisions within Whitemud Ironworks, allow us the flexibility and efficiency to deliver complex projects across Western Canada and the Territories.

Our Supply Chains

Whitemud Ironworks Limited's supply chain consists of local Canadian steel distributors within Western Canada. These distributors would all be the importers of record and are responsible for ensuring they meet the regulatory requirements for importing raw materials (including Bill S2-211). In the rare event that Whitemud Ironworks Limited has unusual supply needs and has to deal with a new supplier – this supplier would be required to meet the Supplier Code of Conduct.

Our Policies and Due Diligence

Policies:

- 1. Supplier Code of Conduct:** The Supplier Code outlines our expectations of Suppliers regarding compliance with laws and ethical business practices, labour practices, non-discrimination, environmental responsibility, quality and safety, confidentiality

and intellectual property, supply chain responsibility, reporting and compliance, and continuous improvement.

We require our Suppliers to adhere to the Supplier Code when conducting business with or on behalf of Whitemud Ironworks Limited. We expect our Suppliers to implement our requirements in a manner that is in accordance with all laws and regulations in their jurisdiction.

- 2. Forced Child Labour in the Supply Chain Policy:** The Forced Child Labour Policy outlines our expectations of supplier responsibilities, due diligence, training and awareness, reporting mechanisms, and continuous improvement as a company to ensure that forced labour and/or child labour is not a factor in our supply chains.

Due Diligence:

Whitemud Ironworks Limited will conduct regular assessments of its supply chain to identify any potential instances of forced labour. Suppliers found to be in violation of “ Bill S-211 (An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act) will be required to take corrective action immediately. Any suppliers that are found to be in violation of The Act will result in termination of the business relationship.

To protect whistleblowers, our Forced Labour in the Supply Chain Policy prohibits any retaliation against any person for reporting, in good faith, contraventions of the policy or for filing a complaint in any manner in any investigation by a government enforcement agency.

Whitemud Ironworks Limited has two new overseas suppliers in the calendar year stated above. As part of the due diligence to ensure all suppliers meet the Supplier Code of Conduct – the President of Whitemud Ironworks Limited travelled to ensure the fabrication facilities met the quality, safety and regulatory standards required before engaging on business.

Currently Whitemud Ironworks has no procedures in place to measure our effectiveness in ensuring that forced labour and child labour are not being used in our supply chains. As a company, we are continuously working on creating effective procedures to put in place in the near future.

Training:

Whitemud Ironworks Limited publishes policies that outline Forced Child Labor and our Supplier Code of Conduct. In addition, we bring awareness to our employees on the potential signs of forced labour and child labour and reporting mechanisms.

How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour in our Supply Chains

As of August 31, 2023, Whitemud Ironworks Limited has not faced situations of forced labour or child labour and therefore has not had to remedy or rectify such situations.

Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, we , the undersigned, attest that we have reviewed the information contained in this report for the entity specified below. Based on our knowledge and having exercised reasonable diligence, we attest that the information in the report is true, accurate, and complete in all materials respect for the purpose of the Act for the reporting year listed above.



Edward Cote
President
May 17, 2024

I have the authority to bind
Whitemud Ironworks Limited



Patrick Cote
Vice President
May 17, 2024

I have the authority to bind
Whitemud Ironworks Limited

