



Britespan Group

Forced Labour and Child Labour in Supply Chains Assessment

May 2025

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Executive Summary

Forced or child labour is a significant problem that affects every business sector and country. According to the International Labour Organization, there are an estimated 27.6 million victims of forced labour globally, with 17.3 million of these individuals exploited within the private economy. The risks of forced and child labour are particularly prevalent in the global supply chains of businesses. Consequently, there is a significant risk that goods imported into and distributed within Canada may have been produced under such exploitative conditions. It is essential that entities and government institutions operating in Canada take proactive measures to identify, address and eradicate forced and child labour from their supply chains, ensuring ethical and responsible business practices.

Since 2024, Britespan Building Systems Inc. ("Britespan") has implemented significant enhancements to fortify its commitment to ethical sourcing and regulatory compliance, particularly in line with Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). Key updates include creating and revising vital documents such as the Supplier Corrective Action Request process, Supplier Quality Audit, Purchase Orders, Supplier Code of Conduct, and a Company Policy on Bill S-211. Additionally, due diligence efforts for suppliers have been intensified. Internally, training initiatives have been launched for key stakeholders and are scheduled for broader rollout. These updates reflect Britespan's proactive approach to supplier accountability, regulatory adherence, and internal awareness, underscoring our dedication to continuous improvement as an ethically conscious organization.

Background

The measures introduced through the Act aim to increase industry awareness and transparency, driving business to improve their practices. There are eight mandatory reporting areas that must be investigated and reported on, which include:

- The actions taken by the entity in the previous financial year to prevent and mitigate the risk of forced and child labour in any stage of the production of goods, whether in Canada or internationally, as well as in goods imported into Canada by the entity.
- The entity's organizational structure, its activities and its supply chains.
- The entity's policies and due diligence procedures concerning forced and child labour.
- The segments of the entity's business and supply chains that are at risk of involving forced or child labour, and the measures taken to evaluate and manage that risk.
- The steps taken to address and remediate instances of forced or child labour.
- The actions implemented to mitigate the loss of income for the most vulnerable families affected by measures to eliminate forced or child labour within the entity's operations and supply chains.
- The training programs provided to employees regarding forced and child labour.
- The methods used by the entity to evaluate its effectiveness in ensuring that forced and child labour are not present in its business operations and supply chains.

Introduction

Britespan, is headquartered in Ontario, and is a group of affiliated legal entities specializing in the design, manufacture, and sale of steel-framed, fabric-covered buildings. The reporting financial year spans from August 1st, 2023, to July 31st, 2024, with no additional reporting obligations in other jurisdictions. With newfound awareness, this is the first version of Britespan's report for 2025. Since its founding in 2010, Britespan has been dedicated to delivering reliable, energy-efficient, and customized solutions to a diverse array of customers across various industries.

Structure

Britespan, has been operating as a corporation since 2010. In accordance with the Act's reporting requirements, Britespan satisfies two out of the three compliance thresholds concerning revenue and asset sizes.

This report covers the following legal entities:

- Britespan Building Systems Inc.
- Britespan Building Systems of Ontario Inc.
- Fabric Building Covers International Inc.
- Fabric Building Covers USA Inc.
- Britespan Fabric Buildings USA Inc.
- Britespan Systemes de Batiments Inc.
- Britespan Holdings Inc.
- Britespan Building Systems of the Prairies
- Britespan Group Inc.
- 1822007 Ontario Inc.
- 126 Benco Inc.

Activities

Britespan specializes in the design, engineering, manufacturing, and delivery of steel-framed, fabric-covered buildings. Britespan serves a wide range of sectors, including commercial, municipal, public works, and agricultural industries. Britespan's versatile building solutions are used across industries such as warehousing, waste and recycling, aviation, agriculture, events and hospitality, military, sports and recreation, marine, and port operations. The company also works closely with a network of authorized dealers who provide customized solutions directly to end customers.

Supply Chain

Britespan's supply chain reflects its strategic procurement efforts within the Canadian market, supporting a consistent flow of specialized materials and components for the design and production of steel-framed, fabric-covered structures. Britespan has roughly 384 suppliers, with the majority located in Canada. Figure 1 presents the total makeup of the supply

BBS GROUP VENDORS PER COUNTRY

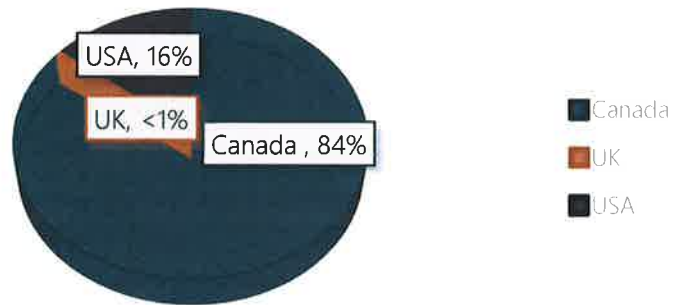


Figure 1

chain by country in relation to the percentage of vendors per region within the last financial year. As illustrated, the vendor base is geographically diverse, with Canada accounting for a substantial 85% of the procurement spend. This is followed by United States at 14%, and the United Kingdom contributing 1%. This global sourcing strategy underscores the company's dedication to maintaining an active and robust presence in the Canadian construction industry, ensuring access to a diverse range of high-quality materials and services.

Policies & Due Diligence

Britespan has the following policies and due diligence procedures in place to mitigate the risk of child labour and forced labour within internal activities and its supply chain:

Current Policies

Employment Equity Policy

Britespan firmly adheres to the principle of equal employment and advancement opportunities for all employees and potential hires. The Employment Equity policy emphasizes Britespan's commitment to fostering a workplace free from discrimination and harassment, ensuring that all individuals, regardless of background, are treated with dignity and respect, and are provided with fair opportunities for professional growth and development.

Harassment, Violence, Sexual Harassment and Discrimination policy

The Harassment, Violence, Sexual Harassment and Discrimination policy outlines Britespan's dedication to providing a work environment where all employees are treated with respect, courtesy, tact, and consideration. Any act of discrimination, harassment or violence is unacceptable and will not be tolerated. Workplace harassment, defined as any unwelcome comment or conduct, is strictly prohibited and can originate from any individual within or outside the company. The policy encourages employees to report

any incidents of harassment. All employees have the right to make a complaint or enforce their rights under this policy without threats, reprisals, or retaliation.

Recognizing and Treating Heat Stress Policy

Acknowledging the significance of employee health and safety, Britespan has a specific policy to address heat stress and heat stroke. This policy is designed to prevent and manage heat-related illnesses by outlining preventative measures, symptoms of illnesses, and specific roles and responsibilities for addressing heat stress at work. By focusing on the well-being of its employees, the company shows its dedication to maintaining a safe and healthy work environment.

Ontario Living Wage Network (OLWN) Employer Certification License

Having the OLWN employer certification requires Britespan to pay its employees a living wage, as defined by the Ontario Living Wage Network. The living wage is an employee's hourly wage to cover basic expenses and to participate in the community. The designated living wage amount is updated annually and corresponds to the specific region where the employee works. This certification indicates Britespan's commitment to fair compensation and supporting the financial well-being of its employees.

Accessibility Policy (AODA)

The purpose behind this policy is to ensure that Britespan provides equal access and participation for people with disabilities by removing and preventing barriers to accessibility. The company complies with the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws. In 2023, Britespan updated its 5-year plan on further improving its accessibility programs as they relate to customer service, company communications, recruitment, employee training, and ensuring compliance with the Ontario Building Code for any new projects. This plan demonstrates that Britespan has a workplace culture of continuous improvement as it relates to inclusivity, accessibility, and welfare for employees.

Supplier Code of Conduct

Britespan has recently developed a Supplier Code of Conduct to establish clear expectations for ethical, responsible, and legally compliant business practices. This code includes specific reference to the Act, reinforcing the company's commitment to human rights, environmental protection, and supply chain transparency. This Code applies to all suppliers, vendors, contractors, and third parties engaged with the company. By partnering with Britespan, suppliers agree to uphold these standards across all operations and throughout their supply chains, supporting integrity, accountability, and compliance with applicable laws and regulations.

Anti Modern Slavery Policy

Britespan has recently developed an Anti Modern Slavery Policy that applies to all employees and aims to prevent and detect suspected instances of child or forced labour. This Policy highlights Britespan's commitment to a zero-tolerance approach to child or forced labour within its operations or supply chain, promoting a safe and ethical work environment.

Due Diligence

Supplier Corrective Action Request

Britespan has a standardized form and process to request supplier corrective action if contract terms are not met. This form documents the root cause of the issue, the required corrective action, new preventative actions, a verification procedure, and implementation dates and signoffs for each. This information is taken into account when doing annual supplier assessments. If corrective actions are found to be inadequate, engagement with that supplier is terminated, and an alternate supplier is identified as a replacement. Additionally, Britespan may conduct supplier site audits to verify past corrective actions. Supplier responses are reviewed by Quality and Purchasing teams to determine if the corrective actions are adequate to prevent recurrence. If accepted, the corrective actions are logged and approved by the Quality Leader and VP Operations.

Purchase Orders

Britespan has recently updated its purchase order to incorporate language around the Act, marking a strong step forward in the company's due diligence efforts. By clearly prohibiting the use of child and forced labour across its operations and supply chain, the company is aligning with international labour standards set by the International Labour Organization (ILO). This proactive move not only helps reduce legal risks but also reinforces the company's commitment to ethical practices. It sends a clear message to customers, suppliers, and other stakeholders about the company's values, building trust and supporting its reputation as a socially responsible business.

Supplier Quality Audit

The Supplier Quality Audit has been improved with the addition of a section which directly addresses the Act. Suppliers are now required to comply with minimum age laws, have clear policies against child and forced labour, and undergo mandatory screening before being approved. The audit also reviews each supplier's Quality Management System, including applicable standards and ISO registration where relevant. It assesses quality control processes, handling of non-conformances, equipment maintenance, and employee training. A standardized scoring system is used to evaluate performance, with recommendations provided to help suppliers improve. These updates have strengthened the company's ability to assess and manage supplier risks, particularly in relation to ethical and regulatory compliance.

Compliance Letter

A review was conducted to assess the compliance of Britespan's top suppliers with the Act. The review examined supplier websites for publicly available 2024 compliance reports. Suppliers that did not have public declarations will be sent a formal Compliance Letter. The letter will request a statement or policy on preventing forced and child labour, details of due diligence processes, and any other documentation demonstrating compliance. It emphasizes the importance of transparency and cooperation in meeting Canadian regulatory requirements and maintaining responsible sourcing practices. It also notes that failure to respond may impact future business relationships. This action reflects the organization's commitment to ethical sourcing and legal compliance across its supply chain.

Risk Identification & Management

A risk assessment of Britespan's supply chain from the dimensions of country of origin and type of good has been performed for our material direct suppliers. For the purposes of this report, material suppliers are those who account for at least 1% or more of Britespan's total procurement spend during the 2024 fiscal year.

This risk assessment used two separate indices to measure the inherent risk of child and/or forced labour related to goods and countries: Walk Free's Global Slavery Index and the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

Countries of Operations and Industry

A risk assessment was conducted on Britespan's countries of operation and the related industry within which Britespan operates. Britespan operates within Canada and the USA in the construction industry. While the construction industry has an inherent risk of forced labour or child labour it is mitigated by the fact that both Canada and the USA are considered to have a low inherent risk.

Countries of Suppliers

For the purposes of a risk assessment over countries where goods are procured from, this report focuses on direct material suppliers. Britespan has 384 material direct suppliers which all operate out of Canada, UK or USA. All three of these countries are considered to have a low inherent risk of forced or child labor.

Type of Goods Procured

A risk assessment was conducted on the types of goods Britespan sources from suppliers that contribute to more than 1% of Britespan's annual expenditure. The risk analysis found high inherent risks of forced and child labour from the raw materials of Cement, Copper, Iron, Timber, and Zinc. However, this is mitigated by the fact that all these items are procured from the USA or Canada, both of which has an inherent lower risk. In light of the inherent risk associated with these goods, Britespan pays closer scrutiny to ensure that forced and child labour does not exist through the goods that Britespan procures. This includes continuing to monitor goods procured, investigating where suppliers receive their goods, and the risk of forced or child labour associated with these goods.

Remediation of Forced & Child Labour & Vulnerable Family Income Loss

Britespan is committed to identifying human rights incidents and violations that occur within our operations and communities. As there were no incidents related to forced or child labour reported to or noted within Britespan, there has not been any need for us to report, correct or remediate any incidents of forced or child labour. Britespan recognizes the significant impact forced and child labour can have on individuals and their families and thus will actively seek to strengthen our processes to reduce the risk of forced labour and child labour within our supply chain.

Awareness Training

Britespan has engaged the services of a professional services firm to train a core team on the topic of child labour and forced labour to ensure they are aware of the requirements related to the Acts compliance. This training covers the purpose and requirements of the Act, which entities it applies to, how to identify signs of forced and child labour, and proactive strategies to prevent such practices throughout the supply chain. Recognizing the importance of setting the tone at the top, Britespan has included key management personnel in this training. These leaders will drive compliance efforts to prevent child labour and forced labour within Britespan and its supply chain.

At the same time, a company-wide training initiative is underway at Britespan. The Director of HR has developed a policy that will be distributed to all employees through ADP, requiring acknowledgment upon rollout. Looking ahead, Britespan will implement an annual training module that includes a presentation and mandatory signoff by all employees. These efforts enhance the company's due diligence by ensuring awareness, accountability, and compliance across all levels of the organization, helping to identify and prevent risks related to child and forced labour.

Assessing Effectiveness

Britespan is committed to continuously enhancing our self-assessment processes. This commitment involves a thorough evaluation of our supply chain practices to identify areas for improvement and ensure that forced and child labour are not being utilized. As part of these self-assessment processes, Britespan is making significant improvements:

Adhere to minimum age laws:

- Maintain formal policies prohibiting child and forced labour.
- Undergo mandatory screening before approval of new employees/suppliers.

Purchase Order:

- A clause has been added to prohibit the use of child and forced labour.

Supplier Compliance Review:

- Supplier reviews were done on compliance to the Act.
- A compliance letter will be sent to all suppliers that don't have public declarations.

Supplier Code of Conduct:

- Britespan has developed a Supplier Code of Conduct. The document outlines the minimum standards and expectations for all suppliers, vendors, contractors, and third parties engaged with Britespan.

Anti Modern Slavery Policy:

- An anti forced and child labour company policy has been developed.

Key Stakeholder Training:

- Training specifically on child and forced labour has been rolled out to key employees and over the course of the next year all employees will be trained.

Conclusion

Britespan has demonstrated a strong and consistent commitment to improving self-assessment processes and actively preventing child and forced labour across its supply chains and within the company as a whole. Through the implementation of strict policies, contractual obligations, employee training, and comprehensive supplier monitoring, Britespan has made significant progress in promoting and being compliant with ethical practices. This has been achieved by its dedication to supply chain mapping, conducting thorough risk assessments, and maintaining secure reporting channels, all of which reflects a robust approach to protecting human rights and reinforcing a zero-tolerance policy toward workplace harassment, misconduct and any form of forced and child labour. These ongoing efforts not only strengthen accountability but also foster a culture of integrity and responsibility throughout the organization.

Attestation

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 Britespan Building Systems Inc. and its related entities. 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.

Ben Hogervorst

Full Name

Signature

A handwritten signature in black ink that reads "Ben Hogervorst". The signature is written in a cursive style with a large, looping "B" and a long, sweeping "t".

Owner and Sole Director

May 21, 2025

Title

Date

I have the authority to bind 'Britespan Building System Inc.' and this report covers the 2024 fiscal year and applies to 'Britespan Building System Inc.' and related entities listed in the report.

