

# Forced Labour and Child Labour Report - 2023

## StructureCraft Builders Inc.

### INTRODUCTION

StructureCraft Builders Inc. is a leading North American Structural Engineering company with operations in Canada, the U.S., and Italy. We recognize that risks of forced labour and child labour (also referred to as modern slavery) do exist and acknowledge that understanding and managing these risks requires a collaborative approach with our suppliers, our employees, and other external stakeholders.

This report outlines StructureCraft's current processes and progress in both preventing and mitigating the risks of modern slavery across our supply chain network.

### REPORTING CONTEXT

StructureCraft is a federally incorporated entity subject to the legal requirements in section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. This Report is pursuant to the Act and approved by the President Gerald Epp on May 31, 2024.



### OUR SUPPLY CHAIN

The supply chain at StructureCraft is a centralized function that supports our operations in Canada, the U.S., and Italy and sources products and services for our projects and operations from various countries. A key role of our supply chain is to ensure spend is tendered with suppliers who meet our qualification standards and corporate requirements which include a stance against Modern Slavery.

In 2023, the majority of StructureCraft's total spend was directed to support operations and projects within the U.S. and Canada. The vast majority of our products and services were sourced via North American and European Union vendors with a very low Modern Slavery risk profile.

### POLICIES AND STANDARDS

As part of our commitment to responsible stewardship, we oppose the use of forced labour and child labour in our operations and across our supply chain.

## MODERN SALVERY: UNDERSTANDING OUR RISK EXPOSURE

The following activities were part of the review:

- Established a core team consisting of internal stakeholders within supply chain to enhance due diligence and risk management activities.
- Ongoing mapping of our end-to-end supply chain.
- Initiated a review of internal policies and procedures for preventing forced labour and child labour within the supply chain: including procurement policies, supplier due diligence, onboarding, and compliance processes. Including multidisciplinary verification that we do not do business with any entity listed by US Homeland Security on the UFLPA Entity List.
- Audited supply chain contract templates for language that prohibits forced labour and child labour.
- Initiated ongoing improvements to internal supply chain processes, policies, and training.

## OUR REMEDIATION MEASURES

Since StructureCraft's review process did not yield any evidence of forced labour or child labour, we did not implement any remediation measures in the 2023 fiscal year.

## ASSESSING OUR EFFECTIVENESS

StructureCraft is committed to developing a resilient and transparent supply chain where the human rights of every worker involved are respected. These activities include assessing contractual terms and working with suppliers to measure the effectiveness of their actions to address forced labour and child labour. The Company also intends to continue developing and implementing additional due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and child labour in our activities and supply chain.

## REPORT APPROVAL AND 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 the entity 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.

*I have the authority to bind StructureCraft.*



**Gerald Epp**  
President and Chief Engineer  
May 31, 2024

