



2023 Modern Slavery Report

by StressCrete Group

Introduction

The Government of Canada has introduced Bill S-211, The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), to increase industry awareness, create transparency, and drive businesses to improve practices. The Act requires certain private-sector entities to report on the measures taken to prevent and reduce the risk that forced or child labour is used by them or in their supply chains.

This is a joint report for the holding company StressCrete Holdings (“the Company”) to include all operating companies under StressCrete Group collectively. All controls and processes occur at the operating company level.

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

The Company considers the respect of human rights to be a fundamental component of the values governing our activities. A culture of respecting human rights while conducting our business activities is a focus everywhere we operate.

In 2023, the Company announced a new strategic Purpose, Vision, and Values. Our purpose is to *operate a family business focused on creating opportunities for our employees and improving the communities that we serve*. The Company is committed to improving the lives of our employees and communities. There are also twelve values that are the foundation of our operations. Key values consistent with the intentions of this Act include:

- Integrity – We enact our vision and purpose ethically, always doing the right thing.
- Civility – We treat each other with dignity and respect in all of our interactions.

- Compassion – We take care of each other and our communities by giving our time and resources.
- Diversity – We respect and value everyone for their differences.
- Legacy – We base decisions on the best interest of our people and the business.

In addition to the above, the following steps have been taken to assist in reducing the risks of forced labour and child labour;

- Conducted a preliminary internal review of our supply chain vendors for exposure to the risks of forced labour and/or child labour; and
- began a review of HR policies to be updated for additional focus on forced labour and/or child labour.

Additional details are noted in this report.

Structure, Activities and Supply Chain

Structure & Activities

StressCrete Group is a family business focused on creating opportunities for our employees and improving the communities we serve. We are building the foundation of enhanced, more livable cities. StressCrete Group services multiple market segments.

StressCrete Holdings Inc. is a Canadian based private holding company with controlling ownership over StressCrete Group operating companies. StressCrete Group operating companies are comprised of six different businesses operating in 5 facilities in Canada (Ontario) and in the United States (Ohio, Kansas, and Alabama).

StressCrete Ltd., established in 1953, is the longest-operating, most experienced manufacturer of spun concrete poles in North America. With plants in Alabama, Kansas, and Ontario, we offer the broadest, most diverse range of spun concrete poles and bollards in the industry; with quality second to none.

King Luminaire Co. Inc. produces a comprehensive assortment of high performance outdoor luminaires, Spartan Sports Lighting, metal poles, pole arms and accessories, plus bollards and site amenities. With plants in Ohio and Ontario, King Luminaire is a North American leader in the outdoor lighting industry.

KingCast Inc. is a gravity die cast supplier of high quality aluminum and zinc products to various market segments in the manufacturing industry located in Ontario.

Supply Chains

The Company's supply chains are concentrated in Canada and the United States. Vendors include raw material suppliers for inputs into our manufacturing processes (i.e. drivers, castings, steel wire, zinc, aluminum, aggregates, etc), transportation services, maintenance services, and various other service providers.

In 2023, 99% of the Company's expenditures were from companies operating in Canada or the United States. Less than 1% of the Company's suppliers are operating outside of Canada or the United States.

Company policies and due diligence processes in relation to forced labour and child labour

The Company has various policies and processes in place to ensure appropriate human rights practices are adhered to within our organization.

Policies

The Company has an employee handbook for both Canada and the United States. There are several policies to ensure that employees are treated equitably and fairly. This includes and are not limited to the following:

- Employee Code of Conduct,
- Employment-At-Will,
- Equal Employment Opportunity,
- Open Door policies, and
- Discrimination, Harassment, and Workplace Violence policies.

The Company will look to add additional Human Rights and Supplier Code of Conduct processes going forward.

Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

A preliminary vendor assessment has been completed of the Company's supply chain to review the exposure to forced labour or child labour. With respect to the risk of forced or child labour, there were two key considerations which include the foreign location where the products are provided, and the products purchased from the supplier. We recognize that in our supply chain there are limits on visibility beyond our first tier of suppliers.

In 2023, 99% of the Company's expenditures were to suppliers operating in Canada or the United States. As per The Global Slavery index , these countries are at a low risk of operating with forced labour or child labour. In addition, the suppliers operating within these regions are required to comply with all applicable laws, rules, and regulations of the jurisdictions in which they operate, including but not limited to, those related to business practices, labour, and employment.

The Company's largest expenditures in 2023 include raw material inputs such as drivers, castings, steel wire, zinc, aluminum, aggregates, transportation services, and professional services. Per the U.S. Government 2022 List of Goods Produced By Child Labor and Forced Labor, all products on their list were produced outside of Canada or the United States.

In addition, the majority of high-risk goods produced by forced or child labour include agricultural goods, cattle, fish, cotton, gold, textiles, etc. which are not a significant risk in the Company's supply chain.

Based on the vendor risk assessment there was a low risk of forced labour or child labour in the Company's supply chain.

Remediation of any forced labour or child labour

To date there have been no identified or reported instances of the use of forced labour or child labour in our activities and supply chains.

Remediation of loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

To date there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Training provided to employees on forced labour and child labour

The Company is committed to fair and equitable employment practices throughout all stages of the employment cycle. Training has been provided to employees addressing respect and civility in the working environment. There has also been specific training programs for management focused on conflict resolution and emotional intelligence. In addition, in 2023, 45% of employees received training covering inclusive and equitable practices in the workplace as it relates to the Ontario Human Rights Code.

Going forward, we will look to enhance our training with additional Human Rights focused training.

Effectiveness assessments to ensure that forced labour and child labour are not being used in our business and supply chains

The Company has an organization-wide risk assessment which documents all key controls. Internal review processes have begun assessing the effectiveness of the controls. The effectiveness assessment of controls over the risk of forced labour and child labour in the Company's supply chain will be reviewed with continued process improvements.

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 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.



Michael Schwenger Jr.
Director
StressCrete Holdings, Inc.