



Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

For the Financial Year Ended: December 2023

1. INTRODUCTION

This is a joint report (the “**Report**”) by Langley Concrete Group Inc. and its subsidiary, Langley Concrete & Tile Ltd. (collectively, “**Langley Concrete**”, “**we**”, “**our**” or “**us**”) for the financial year ending December 31, 2023. This Report was prepared pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Modern Slavery Act**”).

Langley Concrete recognizes the importance of identifying and fighting against forced labour and child labour in its supply chain. We are committed to implementing proper labour practices in our operations and ensuring our direct and indirect suppliers comply with all relevant laws and have similar policies regarding forced labour and child labour. Langley Concrete conducts its operations with high standards and integrity, and is dedicated to continuous improvement in its due diligence, risk assessment and training processes. Langley Concrete does not condone unethical or illegal labour practices and strives to ensure all workers throughout its supply chain are protected from forced or child labour.

This Report sets out the policies and procedures we have in place and the steps we have taken to prevent the risk that forced labour and child labour are used at any step of our supply chain.

2. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Structure

The original Langley Concrete & Tile Ltd. was first created in 1945 and incorporated in 1960 in British Columbia. Presently, Langley Concrete Group Inc. serves as a parent company with two subsidiaries, the current Langley Concrete & Tile Ltd. and Lombard Pre-Cast Inc. (collectively, the “**Langley Concrete Group**”). Langley Concrete & Tile Ltd. handles the majority of the importing and manufacturing associated with the Langley Concrete Group’s operations. Lombard Pre-Cast Inc. was acquired by the original Langley Concrete & Tile Ltd. in 1989 and primarily focuses on the production of dry and wet cast concrete drainage products for the construction of underground infrastructure. The Langley Concrete Group has over 200 employees across its two plants, in Chilliwack and Duncan, and the Langley head office. Please note that Lombard Pre-Cast Inc. does not meet the definition of an entity pursuant to the Modern Slavery Act, nor control any entity as defined by the Modern Slavery Act. Therefore, the remainder of this Report relates exclusively to Langley Concrete.

Langley Concrete is a third-generation company that strongly values integrity and close working relationships. Our overarching objective is to increase our market share by continuously reducing costs, enhancing production capabilities, and investing in new forms and equipment. Our ability to adapt and innovate, coupled with the cooperation of our employees, shareholders, and strong industry connections, ensures a promising future for Langley Concrete.



Activities

Langley Concrete manufactures and supplies the province of British Columbia with precast concrete solutions. Approximately 98% of all sales by Langley Concrete are in British Columbia and approximately 2% are in the state of Washington. In certain circumstances, Langley Concrete supplies a small number of precast concrete solutions in the province of Alberta. Between our two plants, we produce dry and wet cast concrete drainage products for the construction of underground infrastructure, pipes, manholes, box culverts, catch basins, headwalls, vaults, oil interceptors, and the Stormceptor product line. We buy raw materials from various suppliers across Canada, the United States and Denmark.

Supply Chains

Langley Concrete maintains close relationships with each of its suppliers which underpins the core values of our business model. Langley Concrete has forged confidence and trust in its supply chain by building strong relationships with each of our suppliers, some of which have been continuing relationships of more than 60 years. These ongoing supplier relationships reflect our values and demonstrate our commitment to preventing child labour, forced labour and human trafficking in our supply chain. The strong supplier relationships we have developed with our suppliers has fostered, amongst other things, transparency with respect to our supply chain. Supply chain transparency encourages good business practices and allows parties to promote safe and ethical work behaviours, both internally and externally.

Our suppliers provide manufacturing equipment, goods for resale and raw material components used in our manufacturing process. Examples of goods that are not exclusive include coalescing modules, MH rungs, gaskets, castings, wire, rebar, spacers, liners, hog rings, lift anchors and other concrete accessories.

3. POLICIES AND DUE DILIGENCE PROCESSES

Policies

Mission Statement

Langley Concrete's mission is to provide exemplary service and strive to go to the next level for our customers. Langley Concrete sets out to achieve its mission by creating high quality precast concrete products in addition to prioritizing our employees. In prioritizing our personnel, Langley Concrete commits to keeping a safe, well-maintained facility, providing a proper workplace environment, treating personnel with respect, and paying a fair wage for a fair day's work. Langley Concrete understands that employees are at the very foundation of our success. Therefore, employees must be treated highly in order to align with our objectives.

Hiring Practices

Langley Concrete employment opportunities are normally advertised externally on employment websites through which persons may choose to submit an application for employment. Applicants are screened through a review of the information they submit and applicants who present a stable employment history or possess suitable prior employment experience may be invited to an interview. Through the interview process and subsequent background checks including applicant provided references and review of publicly available information, a decision is made on the individual's suitability for employment with Langley Concrete.



There are WorkSafeBC regulatory restrictions prohibiting the employment of persons under the age of 18 in industries where exposure to silica dust may occur. These regulations apply to Langley Concrete. If an applicant appears to be of that approximate age, their information indicates a recent graduation date or their work history is limited indicating recent entry into the workforce, applicants are asked to confirm their age to ensure compliance with WorkSafeBC regulations. Persons who do not meet the minimum age requirement would be informed of Langley Concrete's inability to employ them.

New employees participate in an employment orientation that emphasizes workplace safety and the expectation that Langley Concrete maintain a respectful workplace.

Employment Practices

Langley Concrete adheres to all relevant laws and regulations pertaining to employment practices, human rights legislation relevant to employment practices and health and safety requirements. We take pride in providing our employees with above average wages, excellent health and wellness benefits and a measure of flexibility in their work environment.

Employees of Langley Concrete are represented to management by an elected Employee Committee whose members advocate on behalf of the employee group on issues of workplace conditions, internal hiring practices, workplace accommodation, employee complaints or other issues pertinent to the staff.

We provide each employee with a copy of our Employee Manual which includes all of the policies in place to ensure compliance with employment law as well as fair and consistent treatment of our staff. The Employee Manual also outlines standard shift times and overtime hours, and provides information on wages and health and wellness benefits. Employees are paid overtime if their work extends to more than 8 hours in one day or more than 40 hours in one week.

Workplace Conduct Policy

Management, staff and employees of Langley Concrete are committed to creating a workplace environment free from all forms of discrimination and harassment, as well as all other forms of coercive or disruptive conduct. These type of actions are defined as "improper activity or behaviour" by WorkSafeBC and are not condoned by Langley Concrete. Langley Concrete is obligated to investigate any and all improper activity and behaviour and employees are obligated to report these types of activity or behaviour.

Workplace Health & Safety

Langley Concrete maintains a comprehensive and detailed Occupational Health & Safety Program as described in its Safety Manual made available to all personnel. Key points of this safety program are reviewed as part of its employee orientation and training program. Langley Concrete also promotes and actively enforces safety and health regulations by fostering an environment that allows employees to participate in its workplace maintenance, development and review. As a part of the Occupational Health & Safety Program, employees must complete health and safety orientation as well as training specific to their workplace.

Langley Concrete has an elected shop floor safety committee whose members represent the interests of the employees with respect to health and safety in the workplace. The makeup and function of the committee is defined by the *Workers Compensation Act* (British Columbia) (the "**Workers Compensation**



Act). Compliance with the requirements of the Workers Compensation Act is administered by WorkSafeBC, the workplace safety authority in the jurisdiction in which Langley Concrete operates. WorkSafeBC performs random workplace inspections to monitor compliance with the regulations. Additionally, WorkSafeBC provides a broad range of support to employers in the areas of safety resources, expert advice and training programs and materials.

Due Diligence

Langley Concrete has issued an annual due diligence questionnaire to each of its direct and indirect suppliers in order to assess each supplier's commitment to preventing child labour and forced labour. The due diligence questionnaire asks our suppliers to provide information regarding their sources for raw materials, their compliance with labour standards, and policies they have implemented to prevent child labour and forced labour in their supply chain.

If the information provided by a supplier is not consistent with global efforts to eliminate modern slavery, Langley Concrete will review the goods and materials supplied and make any necessary enquiries to confirm that the source of such goods and materials do not include the use of forced labour and child labour. Where the use of forced labour or child labour is identified in a supply chain, we will immediately cease all commercial trade with that supplier.

Langley Concrete takes a strong stance against, and denounces any use of modern slavery, as defined in the Modern Slavery Act. We demand that all suppliers of Langley Concrete maintain compliance with the laws and standards applicable in the countries in which they operate and that their business practices are aligned with global efforts to prevent modern slavery. Our due diligence efforts and policy on modern slavery are intended to improve our supply chain processes and encourage our business partners to do the same.

Environmental Compliance

Langley Concrete is in compliance with all applicable Provincial, Federal and Municipal Environmental Regulations. Langley Concrete's compliance with the Environmental Regulations are adhered to through the use of proper disposal companies for any garbage or recycling materials, the use of the standard municipal sewer system and the control and monitoring of all storm water egress from its properties.

Langley Concrete utilizes commercially available waste removal companies for our garbage, industrial waste and recycling requirements. Further, Langley Concrete utilizes engineered storm water control devices to control any potentially hazardous or unacceptable materials in our storm water. Filters are utilized on our cement silos to ensure compliance with regulations related to airborne pollutants and any hydrocarbons leaving our site are removed by a licensed recycling company.

We have not received any orders, citations or notice of non-compliance for any of our properties or operations in the last business year and management is not aware of any issues that are of a similar concern.

4. FORCED LABOUR AND CHILD LABOUR RISKS

Langley Concrete has not implemented a formal process to identify the parts of its supply chain that may pose a risk of forced labour and child labour. We rely on 60 plus years of ongoing supplier relationships in order to assess the risks of forced labour and child labour in our supply chains. Langley Concrete places



great emphasis on maintaining the trust and transparency we have developed with each of those supplier relationships. Moreover, the vast majority of goods within our supply chain are sourced domestically where there are laws, regulations and government oversight in place to minimize the occurrence of modern slavery. Our manufacturing operations and employment activities are conducted wholly within Canada and are subject to an effective and well established regulatory framework.

We believe that the risk of forced labour or child labour within our operations is very low. To the best of our knowledge, no forced labour or child labour risks have been identified in our supply chains or operations, and all employment is voluntary. However, we recognize that forced labour and child labour pose a risk to all industries at all levels of supply chains. Especially, where the end products from manufacturing processes are far removed from the original suppliers of the raw materials.

5. REMEDIATION MEASURES

In the financial year ending December 31, 2023, no incidents of forced or child labor in our supply chain were identified. Therefore, no remediation measures were taken. It is our intention to develop remediation policies and processes that enable us to respond appropriately should we identify any instance of modern slavery in our supply chain in the future.

6. TRAINING

No formal training on forced or child labour was implemented in 2023. However, at every level of the company, individuals must follow and comply with Langley Concrete's Code of Conduct, mission statement and policies.

Langley Concrete is committed to evaluating its supply chain in greater detail and introducing effective training measures in the 2024 financial year. Our intent is to raise awareness by requiring decision makers such as executives, senior managers, purchasers, human resources, payroll, and any other employee whose organizational authority influences purchasing decisions, to receive proper training about forced labour and child labour.

7. ASSESSING EFFECTIVENESS

Langley Concrete has not taken any formal actions to assess the effectiveness of our processes and policies designed to ensure forced and child labour is not used in our supply chains. However, we will continue evaluate each supplier's response from the due diligence questionnaires and develop evolving risk assessment initiatives to reduce the risk of forced labour or child labour in our supply chain. Langley Concrete aims to ensure that all of its suppliers and business partners adhere to policies and procedures in line with the OECD Due Diligence Guidance for Responsible Business Conduct.

8. ATTESTATION

In accordance with the requirements of the Modern Slavery Act, and in particular section 11 thereof, I, the undersigned, hereby attest that I have reviewed the information contained in the Report for Langley Concrete. Based on my knowledge, and after having exercised reasonable due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.



The **LANGLEY CONCRETE** Group of Companies

I make the above attestation in my capacity as an Officer of Langley Concrete Group Inc. and Langley Concrete & Tile Ltd.

DATED this 28th day of May, 2024.

LANGLEY CONCRETE GROUP INC.

Per: 
Name:
Title:

LANGLEY CONCRETE & TILE LTD.

Per: 
Name:
Title: