



WALTER'S INC.

MODERN SLAVERY ACT REPORT

FISCAL 2023

Introduction

This report is prepared for Walter's Inc., business number 105581631, (the "Company") in compliance to its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

A. The company's Structure, Activities and Supply Chain

Founded in 1956 and incorporated under the province of Ontario, Walter's Inc. is a privately held family-owned steel construction company that designs, fabricates, and constructs commercial and industrial projects throughout North America.

Walters Inc is a company which offers supply, fabrication and erection of structural steel.

Walters Inc. procures steel from mills and other suppliers that are mainly located in Canada, United States and Europe. In some instances the company imports fabricated assemblies from companies located in Thailand and Vietnam.

B. The company's policy and due diligence processes in relation to forced labour and child labour

Walter's commitment to equal, fair and non-discriminatory employment in adherence with the Ontario Human Rights Code is outlined in our Code of Conduct, which is part of our new hire orientation. We have ensured that our employment terms are stipulated in employment agreements for all employees, whether full-time or part-time, permanent or temporary, aligned with the Employment Standards Act Ontario.

C. The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.

We have ensured that our primary suppliers are established leaders in their industry in their own respective country or region of which their practices are governed by applicable international standards and laws.

D. Any measures taken to remediate any forced labour or child labour.

E. Any measures taken to remediate the 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

No measures have been taken as no reports of forced labour or child labour offenses related to our supply chain have been made.



F. The training provided to employees on forced labour or child labour.

For the FY2023, the company did not provide training to its employees specific to forced labour or child labour. The company is in the process of reviewing what forced labour and child labour training may be suitable.

G. How the entity assesses its effectiveness in ensuring that forced labour or child labour are not being used in its business and supply chains.

The company does not have specific procedures in place to assess its effectiveness in ensuring that forced labour or child labour is not in its activities. However, it will be reviewing the appropriate measures it may implement for the future.

Attestation

In accordance with the requirement of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Walters Inc. 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 aspect of the purposes of the Act, for the reporting fiscal year 2023.

Mark Koppelaar

Executive Vice President, Projects & Production

May 30, 2024

I have the authority to bind Walter's Inc.