



# 2023 Report on Fighting Modern Slavery

May 31, 2024

## I. INTRODUCTION

### **REPORT PURPOSE AND REPORTING ENTITY**

This 2023 Report on Fighting Modern Slavery (the “Report”) has been prepared pursuant to the Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and related guidance from Public Safety Canada, for the reporting period of November 1, 2022 to October 31, 2023 . This Joint Report has been prepared by Almita Piling Inc. as the main reporting entity and includes its affiliate, 351471 Alberta Ltd. and Jeffrey S. Lloyd Family Trust (collectively, “Almita” or the “Company”).

The Act requires specified entities to disclose details regarding their efforts to map their activities and supply chains, and identify and reduce the risks associated with forced labour or child labour (together referred to as “Modern Slavery”).

This report is the Company’s first report pursuant to the Act and it is recognized that reporting pursuant to the Act is a new requirement in Canada. For this initial report, the Company is taking steps to meet the reporting requirements while planning future activities in the interest of meeting the objectives of the Act in future reporting periods.

## II. STEPS TAKEN TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR

As the Company’s first and initial report on Modern Slavery filed under the Act, this Report will form the basis for measuring future improvements of the Company to identify and address Modern Slavery risks in its operations and supply chains.

In preparation of this Report, Almita has conducted an internal mapping of the company’s activities and supply chains.

### **Almita’s operations in Canada**

Almita’s manufacturing operations are based in Canada, where the risks of Modern Slavery are low and where labour laws and regulations ensure decent working conditions to the employees of manufacturing plants operated by Almita. Almita’s Human Resources department continuously work to ensure that it is compliant with local Federal and Provincial laws.

### Almita's Tier 1 Suppliers

As explained in greater details below, all of Almita's direct suppliers are located in Canada and the United States, countries with limited risks linked to Modern Slavery. However, Almita acknowledges there may be risks associated with Tier 2 and Tier 3 suppliers due to Almita's limited visibility of their Modern Slavery practices.

## **III. STRUCTURES, OPERATIONS AND SUPPLY CHAINS**

### Corporate Structure

The reporting Company is constituted of two legal entities: Almita Piling Inc. and its parent company, 351471 Alberta Ltd. Both entities are based in Canada. 351471 Alberta Ltd. is the parent company of Almita Piling Inc.<sup>1</sup>

Almita Piling Inc. is the operating company. Almita Piling Inc. is the only legal entity within the Almita group of companies that produces goods in Canada and imports goods produced outside Canada. The Company meets the revenue and asset thresholds for reporting pursuant to the Act.



### Almita's Operations

Almita Piling Inc. is a company specializing in engineering solutions for foundation needs. In the course of its activities, the Company designs, fabricates and installs helical pile foundation systems. Almita operates two manufacturing plants in Canada that manufacture steel helical piles and related products and equipment.

---

<sup>1</sup> 351471 Alberta Ltd. is controlled by Jeffrey S. Lloyd Family Trust.

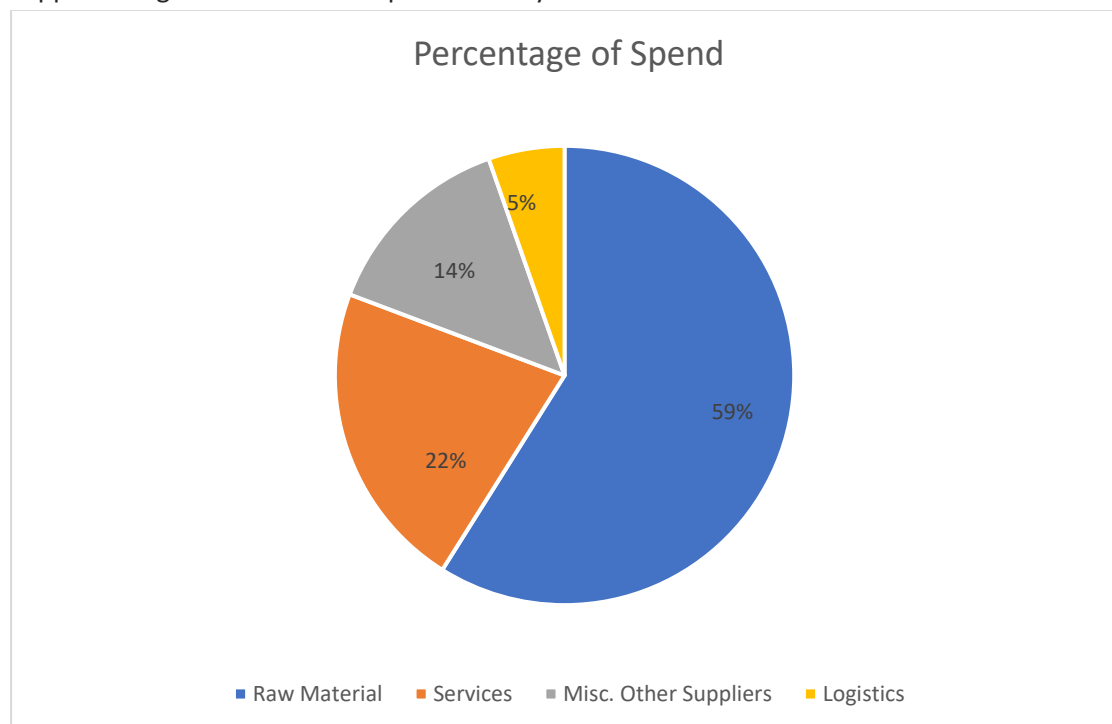
### Almita's Supply Chains

Over the reporting period, Almita has sourced goods and services from active suppliers located in Canada and the United States exclusively, where Modern Slavery legislation and robust labour laws and practices have already been established.

The goods purchased by Almita to support its manufacturing activities, which represent the majority of the value spent in its supply chains, include the following input materials:

- Canadian and US Mills
- Canadian and US Service Centers
- Canadian and US Services (e.g., trucking, welding, material handling, equipment rentals, surveys, NDE testing, third party auditors, and plant maintenance)

Below is a breakdown of the proportion of Almita's expenditure, in Canada and abroad, on suppliers of goods and services purchased by sector:



During the reporting period, the largest categories of supply chains expenditures were:

- Raw Materials and Input Goods: including steel pipe and steel plate used to manufacture helical piles;
- Logistical Services: including transportation (e.g., trucking) services;
- Other Miscellaneous : including fasteners, machinery and parts of machinery needed for our factories and to support our manufacturing activities, and warehousing services; and
- Services: including such as welding and testing services, and welding audits.

All goods and services purchased by Almita over the reporting period were supplied from Tier 1 suppliers located exclusively in either Canada or the United States, two countries with low risk of Modern Slavery and with high labour standards and regulations in place.

The input and raw material purchased by Almita are processed at Almita's manufacturing plants located in Ponoka, Alberta and in Guelph, Ontario. Hence, all of Almita's final merchandise is produced domestically in Canada.

#### **IV. POLICIES AND DUE DILIGENCE PROCESSES**

The Company currently maintains a Respectful Workplace Policy and a Code of Business Conduct. While these policies are not directly focussed on Modern Slavery, they do set the tone for a safe and respectful workplace for all employees.

Almita does not employ anyone under the age of 16 years old. Almita's employees aged between 16 and 18 years old are hired and employed according to the laws and regulations applicable in Canada. In addition, the Company maintains a Code of Business Conduct and a Workplace Violence, Bullying and Harassment Policy. These policies set the tone for the Company's business conduct and the expectations for employee safety in the workplace. These documents will be considered for amendment in the coming year in order to more closely align with the objectives of the Act.

Before doing business with our suppliers, Almita conducts the onboarding of new suppliers through an informal vetting process. In the future, Almita intends to work on formalising this vetting process and to develop best practices and a checklist including questions for its suppliers related to their efforts and commitments in upholding labour standards, championing gender quality, and fostering opportunities for North American indigenous communities.

#### **V. FORCED LABOUR AND CHILD LABOUR RISKS**

During the reporting period covered by this report, Almita did not have a structured risk assessment procedure in place to effectively identify Modern Slavery risks within its operations or supply chains. However, in the course of the next reporting period, Almita intends to adopt specific internal guidelines in relation to Modern Slavery risks and conduct an assessment of its processes to identify risks in its supply chains.

## **VI. REMEDIATION MEASURES OF FORCED LABOUR OR CHILD LABOUR AND LOSS OF INCOME**

As of the date of this Report, the Company is not aware of any instances or accusations of forced or child labor, or any cases of vulnerable families experiencing income loss within its workforce or supply chain. Consequently, no remedial actions have been deemed necessary.

## **VII. TRAINING**

The Company does not currently provide any training in relation to forced labour or child labour. The Company has identified the use of forced labour or child labour in its operations as low. In the coming year, the Company will consider amending its Respectful Workplace Policy and a Code of Business Conduct to include statements to raise the awareness of these potential issues. All existing employees will be made aware of any changes to these policies, and new employees will be educated on the updated policy.

## **VIII. ASSESSING EFFECTIVENESS**

Almita is committed to ensuring continuous improvement across all aspects of its operations and to put in place measures to prevent Modern Slavery across all operations.

The Company qualifies new suppliers and conducts its business primarily within North America. As such, the risk of forced labour and child labour are low, and its suppliers are typically subject to the Act and similar legislation in the USA. As this is the first reporting year pursuant to the act, the Company has not taken any steps to assess its effectiveness in ensuring that forced labour and child labour are not being used in its business or supply chains.

## IX. 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.



I have the authority to bind **Almita Piling Inc., 351471 Alberta Ltd.,**  
and **Jeffrey S. Lloyd Family Trust**

Jeffrey S. Lloyd  
President  
May 31, 2024