



Modern Slavery Report FY 2023

JOINTLY PREPARED BY:
OATEY CANADA SUPPLY CHAIN SERVICES CO.;
G.F. THOMPSON COMPANY ULC; AND
TUBULAR INDUSTRIES OF CANADA ULC

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2023 to December 31, 2023, and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). This Report is made on behalf of three affiliated entities: Oatey Canada Supply Chain Services Co., G.F. Thompson Company ULC, and Tubular Industries of Canada ULC (collectively, “Oatey Canada” “we”, “us” or “our”). A French version of this Report may be requested from by emailing legal@oatey.com.

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading manufacturer and seller of plumbing products, Oatey Canada recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support these, adhere to high ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal Year 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by Oatey Canada or of goods imported into Canada by Oatey Canada.

2. Our Business

Oatey Canada is a plumbing products manufacturer and seller, with its three entities headquartered in Canada. We design, procure, manufacture, and distribute a variety of plumbing products. Oatey Canada’s supply chain includes businesses that supply goods and services to our organization, including raw material providers, finished goods providers, and service providers. We procure goods and services from a wide variety of trusted suppliers and contractors. Further information about our business can be found on our websites: www.oatey.ca and www.belangerh2o.com.

3. Our Policies

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations or by suppliers working for us.

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Oatey Canada's **Supplier Code of Conduct** details the requirements and expectations we have of our suppliers and their supply chains. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Code of Conduct in their own operations and supply chain. We engage with suppliers that are committed to these same principles and suppliers commit to these standards as a condition of doing business with us. We review our Supplier Code of Conduct on a periodic basis to ensure that this policy is in line with current best practices.

We expect the suppliers with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making bringing on new suppliers, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks. We acknowledge that employees working in our facilities and our supply chain are at potential risk of forced labour or child labour. In order to mitigate this risk, we follow a due diligence approach that may include the following actions: conducting site visits, using third party software to screen suppliers for adverse media and legal violations, and incorporating compliance with applicable laws into our purchase orders.

4. Assessing Our Risk

Oatey Canada engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, we refer to external data sources, engage with our peers, and consult with external experts as needed, and conduct risk assessments. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Dangerous or undesirable work
- Presence of migrant workers
- Presence of labour intermediaries
- Offshore production
- Long, complex, or non-transparent supply chains
- Presence of child labour
- Jurisdictional risks including poverty, conflict, and enforcement of international human rights standards

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties.

5. Our Commitments

Oatey Canada takes the following steps to reduce risks of forced and child labour:

- Developing and implementing contractual clauses that require suppliers to comply with applicable law;
- Periodically auditing suppliers;
- Monitoring suppliers;
- Periodically engaging with supply chain partners on the issue of addressing forced labour and/or child labour;

In the event that we discover any forced labour or child labour in our business and supply chains, we will take the following measures to remediate such forced labour or child labour:

- Suspension or termination of a supplier, sub-supplier or contractor;
- Actions to prevent forced labour or child labour and associated harms from reoccurring;

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We provide employees with ongoing and periodic training opportunities to ensure that employees have current knowledge.

6. Our Progress and Effectiveness

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns that have been raised. To date no significant concerns or complaints related to forced labour or child labour have been identified.

7. Approval & Signature

This Report was approved by each of Oatey Canada's three boards of directors on May 2, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company websites at www.oatey.com, www.oatey.ca, and www.belangerh2o.com.

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

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Michelle Newland

Executive Vice President, Chief International Business Officer

I have the authority to bind Oatey Canada