

BILL S-211 REPORT

Joint Report on Forced Labour and Child Labour in Supply Chains

Walker Industries Holdings Limited ("Walker")



walker

Report on Financial Year: January 1, 2024 – December 31, 2024



WALKER'S STRUCTURE, ACTIVITIES AND SUPPLY CHAINS.

Walker started in 1887 as a single cut stone quarry and has evolved into a multi-divisional diversified enterprise with over 1200 employees across North America. Walker has three lines of business: Aggregates & Construction, Environmental services and Emulsions. Walker is comprised of multiple wholly owned subsidiaries that manage our varied lines of business. These include Walker Aggregates Inc., Walker Environmental Group Inc., Walker Emulsions Limited, All Treat Farms Limited and Gro Bark Ontario Limited, as well as several other smaller entities.

Walker's head office is located in Niagara Falls, Ontario and has 76 locations across Canada and 4 in the United States. Walker is a privately owned corporation incorporated under the Business Corporation Act of Ontario.

Walker's values are key to our long-term success and are defined as "REACH" or Resilience, Environment, Accountability, Community and Humility. Our REACH values are a key part of our decision-making processes and are embraced by our staff. Please visit our website for additional details: <https://walkerind.com/who-we-are/>.

Walker's supply chains have been traced and are predominantly based in North America, with the largest percentage of customers and suppliers based in Ontario, Canada.

Walker's Procurement Team is based in Ontario and supervises procurement of capital equipment, fuel, supplies and other large expenditures.

POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR

Walker has a robust suite of policies to support its businesses and employees. These include but are not limited to: Harassment and Discrimination, Health & Safety, AI Governance, Privacy and the Right to Disconnect.

Walker's suppliers are primarily based in the geographical areas where we do business in North America. Walker has built its standing as a leader in the industries we work in by offering high quality products and services to our North American customers while maintaining strong values. Walker maintains good standing in the communities we conduct business in and has been doing



so since 1887. Our commitment to responsible corporate citizenship extends to our partnerships alongside ethical local suppliers. Walker confirms that its processes uphold its dedication to quality and ethical standards at every stage. Walker is committed to ensuring that consumers and suppliers are more informed and aware of the products they purchase and the companies they support. Although the risk of forced labour and child labour is deemed low in our supply chains, Walker continues to monitor its procurement practices and recognizes its commitment as an ongoing responsibility of corporate citizenship.

Walker adheres to employment standards in the jurisdictions where we operate across Canada and the US. We also adhere to privacy and data requirements impacting consumers, businesses, and our employees, supported through internal policies.

BUSINESS AND SUPPLY CHAINS THAT CARRY RISK OF FORCED CHILD LABOUR BEING USED AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

Walker has assessed its supply chain risks and measures to remediate those risks. Walker reviewed the countries of origin of its purchased goods and has identified Canada and the United States as its primary source of both suppliers and customers.

The list of Walker's direct suppliers was reviewed in detail. Over 99% of Walker's existing suppliers are based in Canada or the United States. This is significant because both countries have robust legal frameworks that actively combat forced and child labour. While the risk of forced labour and child labour in North America is deemed low, Walker understands its continued commitment to combating these forms of labour and acknowledges its ongoing effort to assess current and future suppliers in North America and beyond. With respect to the remaining suppliers making up less than 1%, they were reviewed against the Global Slavery Index (GSI) (<https://www.walkfree.org/global-slavery-index/>) referenced by Public Services and Procurement Canada, which did not identify them as high risk. The remaining suppliers making up less than 1% are based in Ireland, UK, Israel, Belgium, Switzerland, and New Zealand. These countries all have a rating in the lowest quarter of the vulnerability scale based on the Global Slavery Index.

By reviewing Walker's current supplier practices, we have assessed our operations as very low risk for directly supporting any form of forced labour and child labour in its supply chain.



REMEDATION MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO MOST VULNERABLE FAMILIES AND TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

Walker has assessed the requirement to train staff and manage impacts to vulnerable families effectively.

We have not identified any losses to vulnerable people because of actions taken to eliminate child and/or forced labour. We acknowledge our role in mitigating the potential impacts of those affected by our business decisions should we identify the need to address any concerns related to our supply chains in the face of shifting vulnerability scales.

We will endeavor to communicate to those individuals who are involved in procurement to verify country of origin when vetting new suppliers.

The Bill S-211, aimed at increasing industry awareness and Fighting Against Forced Labour and Child Labour in Supply Chains Act, is a serious matter for Walker. The company engages with an extensive network of suppliers across North America for various goods & services and fully supports all efforts to end child and forced labour practices.

Adhering to Bill S-211 helps Walker align its operations with ethical labour standards and our values. This enhances Walker's reputation as a responsible business.

Walker assesses that our risks of doing business with a supplier who indirectly benefits from child labour is low given the locations and types of businesses that we are in.

Bill S-211 encourages companies to re-evaluate and innovate their supply chain management strategies. For Walker, this means continuing partnerships with suppliers who adhere to ethical labour practices and investing in practices that provide greater visibility into the supply chain.

During the last financial year, the company initiated a structured approach to understand and integrate the requirements of Bill S-211, aimed at preventing and minimizing the risk of child and forced labour within its supply chain.



The initial step involved reading the Bill and understanding the reporting requirements. This included reviewing the policy documents to understand the policy objective and its operational implications on Walker. The study was focused on understanding the annual reporting requirements, the details of the online questionnaire, approval and attestation obligations, and report publishing requirements. This foundational knowledge is now supporting the company in enhancing its internal policy frameworks and reporting mechanisms from suppliers.

Walker analyzed its current practices and policies against established standards and gathered relevant industry best practices that could be integrated into the company's operational frameworks. This analysis identified areas for improvement, including enhancing the existing corporate supplier policy and the process to onboard new suppliers.

Walker will further its efforts to prevent and reduce the risk of forced labour and child labour prevalence in the supply chain by collecting attestations from potential high risk suppliers.

Walker does not currently have a separate policy addressing concerns related to forced labour and child labour. However, we will enhance our existing corporate supplier policy to address this.

Walker remains committed to ethical business practices by strengthening its policies and procedures to address forced and child labour risks in its supply chain. As detailed in this report, our approach involves robust due diligence, enhanced supply chain controls, and ongoing stakeholder collaboration to ensure compliance with Bill S-211.

These steps form a solid foundation for ongoing compliance and continuous improvement of our supply chain practices.



Attestation By: Georgie Walker
President and Chief Executive Officer
Walker Industries Holdings Limited

Reporting Period: January 1, 2024, to December 31, 2024

Due: May 31, 2025

Subject: Annual Report (Joint) prepared in accordance with Bill
S-211, *Fighting Against Forced Labour and Child
Labour in Supply Chains Act*

APPROVAL AND ATTESTATION

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), and in particular section 11, I, in the capacity of President and Chief Executive Officer, the governing body by and on behalf of Walker Industries Holdings Limited, the controlling entity of each entity included in the report as defined by the Act (collectively referred to as, “Walker”), attest that I have reviewed the information contained in the report on behalf of Walker. 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 purpose of the Act, for the reporting year listed within this report.



Signature

I have the authority to bind Walker

May 29, 2025

Date

Georgie Walker
President and Chief Executive Officer
Walker Industries Holdings Limited