



Forced Labour and Child Labour in Supply Chains Report

Introduction

This report is prepared by Teranorth Construction & Engineering Limited (Teranorth) for the financial year ended January 31, 2024 in accordance with Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour Supply Chains Act and to amend the Customs Tariff (the Act), sections 11(1) and 11(3).

Structures, Activities and Supply Chains

Teranorth is a privately owned construction company satisfying the definition of Entity within the Act, meeting the size related thresholds and by having a Canadian business presence doing business and having assets in Canada.

Teranorth strives to maintain a highly regarded reputation with a dedicated workforce providing construction services primarily to the Ministry of Transportation of Ontario (MTO) and various northern Ontario municipalities. Teranorth constructs highways, interchanges, bridges, sewer and water infrastructure, subdivisions and various sitework.

Teranorth maintains certifications with various organizations, including the Canadian Council of Independent Laboratories, CSA Certification for Pre-cast Concrete, Canadian Welding Bureau, MTO Motor Vehicle Inspection Station Licence, Profession Engineers of Ontario and with Intertek for ISO-9001:2015.

Teranorth may at times have up to 450 employees across all of its projects, depending on the current work program. The majority of employees are unionized and seasonal workers, under an all-employee collective bargaining agreement with the Local 793 International Union of Operating Engineers

Teranorth procurement primarily includes purchases related to construction equipment, parts and supplies related to its construction operations. Materials purchased for use in our construction projects are primarily from Canadian suppliers, that are well established and are often prequalified meeting MTO material standards. We typically recurrently use the same group of suppliers year over year on numerous projects. Teranorth also engages with subcontractors for a substantial portion of construction activity, the majority of all of which are all MTO qualified as well.



Policies and Due Diligence Processes

Teranorth recognizes its responsibility to reduce and eliminate unsafe acts and conditions in the workplace that can lead to occupational injury or illness or property damage. Our Occupational Health and Safety policy is posted for reference, at every jobsite. To this end, we are committed to providing a safe and healthy workplace environment whereby all employees and subcontractors can work safely with the support of effective safety oriented training, functioning Health and Safety Representatives, and policies and programs in place that target the hazards in our industry for the protection of our employees as well as an effective orientation program. To this end we are committed to hiring competent persons as supervisors and to ensuring that all, clients, constructors, management and staff work in an environment where safety is an integral part of our corporate culture.

Additionally, Teranorth is committed to upholding ethical standards and practices in line with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9. Teranorth is committed to ensuring that a yearly review of the Corporate Health and Safety Objectives vs. performance is conducted along with hazard assessments and accident analysis to allow for an effective yearly review and continual improvement of our Occupational Health and Safety Program.

Forced Labour or Child Labour Risks

Teranorth has evaluated the potential presence of forced labor and child labor within our operations and supply chains. This evaluation focused on the risks associated with the geographic regions from which we source materials and equipment for our construction projects. Given the relationships we maintain with our subcontractors and suppliers, we have determined that the likelihood of forced labor or child labor in our business or supply chains is negligible.

Remediation Measures

Teranorth has assessed that its activities and supply chains do not carry a risk of forced labour or child labour being used. Remediation measures currently are not applicable. Teranorth will continue to take steps to prevent the risks of forced labour and child labour and will assess appropriate remediation measures if the need arises.

Remediation of Loss of Income

To date, Teranorth has not identified any instances where the efforts to prevent/reduce the risk of forced labour or child labour in the operational activities has impacted and contributed to a loss of income for vulnerable families. Remediation measures for loss of income are currently not applicable.



Training

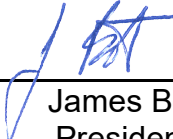
All employees are required to complete the mandatory Teranorth Orientation training, and an Annual Policy Review prior to beginning work, or as soon as possible thereafter. This training is taken annually. Teranorth has incorporated awareness training into the Orientation specific to the awareness and prevention of forced labour and child labour and has incorporated awareness into our Health and Safety Manual.

Assessing Effectiveness

Teranorth will monitor the effectiveness of policies and procedures. Improvements will be made where necessary should any deficiencies be discovered.

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.



James Bot
President
May 31, 2024

I have the authority to bind Teranorth Construction & Engineering Limited.

