

Woodbridge Pallet Limited Human Rights Policy

2024

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Woodbridge Pallet Limited manufactures and repairs wooden pallets corporate users. We recognize our corporate responsibility to uphold human rights and conduct our business with social responsibility. Sustainable business practices and employee safety are integral to our corporate culture.

Our company is committed to the highest standards of ethical conduct in all aspects of our operations. This commitment is supported by robust policies and practices that ensure fair, ethical, and honest business dealings, strong governance, and compliance with applicable laws, all while demonstrating respect for human rights. We maintain full transparency and welcome auditing processes to offer comprehensive insights into our business operations.

Aligned with our core values, Woodbridge Pallet Limited is dedicated to promoting human rights in the workplace. This includes respecting all individuals and fostering an environment where colleagues can achieve their full potential. Our commitment to human rights is embedded in our core values and reflected in the principles of our Woodbridge Pallet Limited Policy Handbook.

This policy applies to all Woodbridge Pallet Limited employees and locations across Canada, as well as to individuals acting on the company's behalf.

2023 MODERN SLAVERY STATEMENT

Introduction

The Company is Woodbridge Pallet Limited (“Woodbridge Pallet”). This is the Modern Slavery and Human Trafficking Statement of the Company for the calendar year ending December 31, 2023 (the “Reporting Period”).

The statement is made pursuant to S-211, an act to enact the Fighting Against Forced Labour and Child Labor in Supply Chain Act (the “Act”) and describes measures in place at the Company to ensure that slavery and human trafficking are not taking place within the Company’s business and supply chains. In accordance with the Act, this statement will be published on the following website: woodbridgepallet.com

Steps to prevent and reduce risks of Forced Labor and Child Labour

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the highest importance on respecting human rights while conducting our business activities everywhere we operate. We expect the same from our business partners.

In general terms, we took the following steps during the Reporting Period to prevent and reduce the risk of forced labor or child labor in our business and supply chains:

- Conducted a preliminary initial internal assessment of the risks of forced labour and/or child labour in our supply chains to enhance our supplier Third-Party due diligence process; and
- Tested our new supplier Third-Party due diligence process, which includes modern slavery risks, with selected suppliers with the objective of testing the process and improving it as necessary.

Details of the above actions are set out in this statement.

Structure, Activities and Supply Chains

Headquartered in Woodbridge, ON, founded in 1985. Woodbridge Pallet now has 3 sites in Ontario.

Woodbridge Pallet is a privately held Canadian incorporated company with approximately 170 employees. We strive to create a diverse and inclusive culture everywhere we operate. Woodbridge Pallet's produces approximately 30,000 pallets daily and repairs approximately 6000 pallets daily. The raw materials are procured from our suppliers in Canada which some of them may be purchased from suppliers around the world. Most of these raw materials are provided by suppliers with whom which Woodbridge Pallet has had a long-term relationship. Woodbridge Pallet seeks long-term relationships with major direct and indirect suppliers for the delivery of products.

Policies, Governance and Due Diligence processes

Woodbridge Pallet is committed to embedding human rights considerations into its standards, policies, governance framework and decision making. As such, Woodbridge Pallet sees the management of Environmental, Social and Governance ("ESG") risks and opportunities as an inherent part of Woodbridge Pallet's success as a business. Woodbridge Pallet regularly tracks the potential sustainability-related risks that are shaping our operating environment and develops and implements strategies to progress its performance across sustainability areas.

Human Rights Statement

Woodbridge Pallet's commitment is to uphold human rights through the Act, Woodbridge Pallet reiterates our position to not use child or forced labour. In support of this commitment, we expect all employees at all levels, as well as our business partners, to act accordingly.

Third Party Due Diligence Policy

While improving operational efficiency, we continue to strengthen our processes to reduce risks related to forced and child labour. In line with our Third-Party Due Diligence Process, our supply chain organization applies a risk assessment procedure prior to engaging with new suppliers and conducts reviews based on their operational risk framework.

Woodbridge Pallet has taken measures to strengthen the existing Third-Party Due Diligence process for supply chain by enhancing it with a comprehensive risk-based approach that improves Woodbridge Pallet's ability to identify and mitigate risks associated with its supply chain. Modern slavery risks are encompassed in this process and in 2024, selected suppliers went through the process with the objective of testing it and improving it as necessary.

Reporting and Non-Retaliation Policy

Should employees or suppliers have concerns regarding forced or child labour, they have a responsibility to report their suspicions. To that effect, Woodbridge Pallet provides multiple channels for them to report any potential breach, on a confidential basis or not, such as reporting: to colleagues, including supervisors, human resources representatives, legal services representatives, internal audit representatives or next level of management.

Assessing and Managing our Risk

Woodbridge Pallet uses a risk-based approach to assess and manage our risk of forced labour and child labour. Our approach helps us prioritize our efforts and adjust our actions. Our methodology to identify risks in our supply chain through our Third-Party Due Diligence process combines supplier's category and type of products/services offered by the supplier.

Our methodology to identify risks is based on 1) whether the supplier is headquartered or its manufacturing sites are located in countries outside of Canada and United States, 2) whether the products/services come from or are delivered to one of the countries outside of Canada and United States, 3) whether Woodbridge Pallet is supplied with certain indirect goods and services, and 4) if the products offered by the supplier to Woodbridge Pallet include raw materials.

Remediation Measures

Woodbridge Pallet offers a reporting mechanism for our employees and suppliers to report ethical or legal violations, among other concerns. If a situation of non-compliance is identified, Woodbridge Pallet will work to develop and implement a corrective plan to improve and remedy the situation.

Training

Woodbridge Pallet's employees receive regular tailored training on ethical topics and our policies. All new office employees are assigned an onboard training package which includes training on our standards. On an annual basis, all office employees are required to agree their abidance by our standards.


In 2024, Woodbridge Pallet intends to provide training to targeted audiences that will include policies and procedures geared towards identifying and preventing child and forced labour.

Assessing effectiveness

Woodbridge Pallet has in place several measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. While we have not yet taken any actions to assess the effectiveness of those actions, Woodbridge Pallet intends to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains as we evolve our business practices.

Approval

This statement has been approved by the President of the Company on May 31, 2024, for the calendar year ending December 31, 2023.



President
Date: May 31, 2024