

# REPORT PURSUANT TO THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT 2023 REPORTING PERIOD

# Report issued by:

Priority Wire & Cable, Inc.

(the "Company", or "we")

On October 14, 2024

#### INTRODUCTION

This report has been prepared in accordance with and for the purpose of complying with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the "**Act**"). It presents the measures taken by the Company, for the period of January 1, 2023 to December 31, 2023 (the "**Reference Period**"), to identify and address the risks of forced labour and child labour in its operations and supply chains.

#### **ABOUT THE COMPANY**

Priority Wire & Cable, Inc. is a corporation formed on March 16, 1993, under the laws of the State of Arkansas, USA. It is a wholesale supplier of wire and cable products. The Company's only facility in Canada is located in Mississauga, Ontario. Our Canadian website is available at <a href="https://www.prioritywire.ca/">https://www.prioritywire.ca/</a>

#### SUBJECT TO THE ACT

The Company is an "entity" pursuant to the Act since (a) it has a place of business in Canada and has assets in Canada and, (b) based on its consolidated financial statements, it meets all three of the following conditions for at least one of its two most recent fiscal years:

- a) it has assets of at least \$20,000,000;
- b) it has generated revenues of at least \$40,000,000; and
- c) it employs an average of at least 250 employees.

The reporting obligations of Part 2 of the Act apply to the Company, since the Company produces goods outside of Canada, imports them into Canada, and sells or distributes them in Canada.

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

Besides regular visits to major suppliers as part of our quality control process, no steps have been taken specifically to prevent and reduce the risk of forced labour and child labour. The Company is currently working on an internal code of conduct for labour employed and subcontracted by the Company, which should be finalized during the next reference period.

#### **B. SUPPLEMENTARY INFORMATION**

#### a. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

#### Legal and organizational structure

The Company is a corporation governed by the laws of the State of Arkansas, United States.

The Company does business in Canada through a branch.

#### **Number of employees**

The Company, considering all of its subsidiaries and sub-subsidiaries, has approximately 742 employees, 43 of which are located in Canada.

#### Governance

The Company is governed by a board of Directors and is privately owned by US interests.

### **Activities and Supply Chain**

The Company works in the wholesale goods sector and produces wire cables products, including aluminium and copper conductor wire and cables, grounding products, lighting products, fiber optic cables, flexible conduit and more.

Our main suppliers are located in the United States, Mexico and Canada, but some of our suppliers are located elsewhere, including, among others, Italy, Turkey, Poland, South America, Vietnam, Cambodia, India and China.

In Canada, the Company has a warehouse used for distribution of the products and employees for Canadian sales and the operation of the facility.

# b. FORCED LABOUR AND CHILD LABOUR DUE DILIGENCE POLICIES AND PROCESSES

We conduct regular due diligence activities for our main supplier by making regular visits of their installations.

The Company does not have any formal policy or process to prevent forced labour and child labor. We are currently working on an internal code of conduct, which will address such concerns.

#### c. RISKS OF FORCED LABOUR OR CHILD LABOUR

Cambodia and China are recognized by the Walk Free Foundation<sup>[1]</sup> for their prevalence of forced labour and modern slavery. As a result, although the Company has no reason to believe its suppliers in those countries are engaged in forced labour or modern slavery, the Company has identified suppliers in such countries as higher risk.

#### d. MEASURES TAKEN TO ADDRESS THE USE OF FORCED LABOUR OR CHILD LABOUR

The Company has not taken any specific measures to address the use of forced labour or child labour.

# e. MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME CAUSED BY THESE MEASURES

No measures have been taken to address the use of forced labour or child labour. Accordingly, no measures have been taken to remediate the loss of income caused by such measures.

#### f. EMPLOYEE TRAINING

No training has been conducted on forced labour and child labour during the Reference Period.

## g. EVALUATING THE EFFECTIVENESS AND IMPACT OF OUR ACTIONS

The Company is currently unable to evaluate the effectiveness and impact of its actions on forced labour and child labour.

## **APPROVALS**

This report has been approved by the board of directors of Priority Wire & Cable, Inc.

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 Priority Wire & Cable, Inc. 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.

Rame: Rob Strahs

Title: Chief Operating Officer Date: October 14, 2024

I have the power to bind Priority Wire & Cable, Inc.