



FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

2024 Annual Report

Introduction

This report has been prepared by Flynn Canada Ltd. (“**Flynn**”) in response to the requirements under the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This report covers Flynn’s financial year ended December 31, 2024.

Flynn does not knowingly use forced labour or child labour in any of its operations, nor does it knowingly purchase goods or services from suppliers that use forced labour or child labour. Flynn acknowledges the risks of forced labour and child labour in the global supply chain. This report sets out the actions taken over the last year in the ongoing assessment and prevention of any risk that forced labour or child labour is used in Flynn’s operations and supply chains.

Flynn is committed to ongoing monitoring and improvement in its risk assessment and due diligence activities and to implementing such processes, training and remediation as may be necessary. Flynn has and will continue to promote labour practices that protect the safety and human rights of all employees.

Structure, Activities and Supply Chain

Structure

Flynn is part of the Flynn Group of Companies, North America’s largest total building envelope contractor, with 35 offices across Canada and the United States and more than 6000 employees. We are proud of making a difference by building a bright future for our employees, customers and communities by what we do, and how we all do it, every day.

Flynn is a private entity incorporated under the *Canada Business Corporations Act*, governed by the laws of Canada.

Activities

Flynn is a fully integrated building envelope contractor, involved in designing, manufacturing, fabricating, installing and maintaining the complete building envelope. This breadth of function allows a degree of enhanced visibility into the sources of the labour and material used in Flynn’s services.



Flynn's key service offerings consist of:

- **New Roofing** – design services and installation of new commercial roofs
- **Building Services** – roof and wall retrofits, waterproofing, emergency leak response, roof audits, repairs and preventative maintenance
- **Architectural Metals** – the design, fabrication and installation of exterior and interior custom designed roof and wall architectural metal systems in commercial buildings
- **Glazing** – the design, engineer and manufacture of unitized curtain wall and other specialty systems for institutional, commercial and industrial facilities

Supply Chain

Flynn has a centralized procurement function, with a dedicated team responsible for the selection, co-ordination and oversight of suppliers in the company's purchase of materials for Flynn offices and worksites. This approach allows Flynn to realize scale and efficiencies in pricing. It also co-ordinates timely delivery, while enabling more focused and direct supplier engagement.

In 2024, Flynn continued to closely monitor the sources and locations of its product and material purchases. Canada and the United States continue to be the predominant sources for Flynn's purchase of goods and materials by a large margin. To the extent that Flynn used offshore suppliers, its purchasing continued to be concentrated in Europe - specifically Spain, Ireland, Belgium, Germany and Britain. It also purchased limited materials from suppliers located in the Middle East and Asia.

Flynn engages key suppliers who are industry leaders with strong credentials and standards. However the size and scope of Flynn's business means that goods are supplied by a large number of companies - from small local businesses to international companies. Goods are procured for Flynn's manufacturing operations, use on project sites and to support Flynn's operations.

Policies and Due Diligence Processes

It is paramount to Flynn leadership that the business demonstrate the highest ethical, responsible and professional conduct in its operations. Maintaining that standing is key to ongoing and future success. Flynn is committed to good corporate governance, including responsibility for ensuring human rights are protected.

The Board of Directors of Flynn has ultimate responsibility for the oversight and monitoring of the company's approach in this area, with some functions delegated to an Executive Management Committee and various subcommittees.



Flynn has centralized and robust internal Human Resources, Health and Safety, Finance and Legal functions, among other shared services. These teams are responsible in the first instance for managing compliance, training and monitoring of worker safety and human rights and financial controls.

Forced Labour and Child Labour Risk

Flynn is a voluntary signatory to numerous collective agreements with labour unions in areas of its operations and has a long, successful track record of using union workforces on projects.

Flynn's keen focus on the health and safety of its employees makes it an industry leader in this area, with best-in-class key performance indicator metrics.

The recruitment and hiring of Flynn employees is carried out, with very limited exception, by Flynn's centralized Human Resources team. Flynn relies on its in-house recruitment specialists and immigration professionals to personally interview potential employees and temporary foreign workers as part of its hiring practices. This minimizes the use of external recruiters or temporary worker agencies.

Flynn has excellent systems in place to protect employees in Flynn's operations. The centralized Human Resources function and HRIS system ensures the integrity of the recruitment and hiring process. Each employee meets the necessary age and other legal requirements, supported by the requisite documentation to ensure compliance. Once onboarded, Flynn's leading health and safety program is designed to protect its workers, together with policies, procedures and ongoing training in health and safety, employment and human rights.

Through the assessment conducted by Flynn while preparing its inaugural report for 2023, the company recognized that as with other large businesses with diverse supply chains, there is the potential for risk of forced labour and child labour in Flynn's upstream supply chains. As noted in this report, Flynn has ramped up its engagement with suppliers on this topic to gain better visibility and accountability.

Assessment and Management of Risk

Flynn built on the strategies initially developed for the 2023 report to identify and continue to manage the potential for risk of forced labour and child labour in its business activities and supply chains. While Flynn is confident in the integrity of its own on-site business activities and hiring practices, the greatest potential for risk continues to be limited visibility into Flynn suppliers' own upstream supply chains.



The key initiatives undertaken by Flynn during the reporting period to prevent or reduce the risk of forced labour and child labour were focused primarily around the company's procurement and contract processes.

Steps taken include the following:

- Reinforcing a formalized supplier and subcontractor prequalification process
- Ensuring supplier and subcontractor agreements explicitly require compliance with all applicable laws
- Requiring a written agreement or purchase order be in place for procurement of materials, containing Flynn standard provisions
- Detailed reporting of Flynn suppliers by location to assess potential risk areas
- Increased engagement with manufacturers and suppliers to determine what steps are being taken to guard against the risk of forced labour and child labour in their own supply chains
- Initiation of a more deliberate approach to selecting local products and suppliers where possible

Remediation Measures, Including Loss of Income

As of December 31, 2024 Flynn has not encountered situations of forced labour or child labour in its supply chain and has therefore not had to remedy or rectify such situations.

Employee Training

The Flynn Human Resources, Health and Safety and Legal teams are responsible for periodically providing training to employees on Flynn policies, including the Workplace Anti-Violence and Workplace Anti-Harassment policies, as well as compliance with labour, employment, safety and human rights obligations.

Flynn policies and the collective agreements to which Flynn is signatory prescribe the process for reporting and investigating a potential breach of safety, employment, labour or human rights obligations. Each employee is responsible for understanding and complying with these policies.

Flynn has not developed standalone training on the issues of forced labour and child labour. However the review, assessment and management initiatives emanating from preparation of this and the prior year report have served to raise awareness of these issues more broadly within the organization.



Effectiveness Assessment

The following measures have been identified for potential further development and implementation by Flynn to prevent and reduce the risk of forced labour and child labour in Flynn's supply chain:

- Obtaining more detailed information from Flynn suppliers and subcontractors to confirm point of origin for the raw materials and manufactured goods supplied to Flynn
- Increase focus on sourcing materials and goods from suppliers local to Flynn business units
- Implementing the use of formal questionnaires and compliance statements with Flynn suppliers and subcontractors to ensure compliance with the Act
- Developing and implementing supplier and subcontract agreement clauses that specifically prohibit forced labour and child labour
- Reviewing Flynn policies and procedures to ensure that a mechanism exists for concerns relating to forced labour and child labour in Flynn operations or supply chain to be brought forward and investigated
- Reviewing training materials to incorporate specific reference to the Act as it relates to forced labour and child labour

Approval and Attestation

This report has been approved by the Board of Directors of Flynn. In accordance with the requirements of the Act, and section 11 in particular, I attest that I have reviewed the information contained in this report for the entity 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 specified above.

Signed in the City of Mississauga, the 31st day of May, 2025

Dan Sims
President and CEO

I have authority to bind Flynn