



PHOENIX FENCE Corp.

Name of Entity: Phoenix Fence Corp.

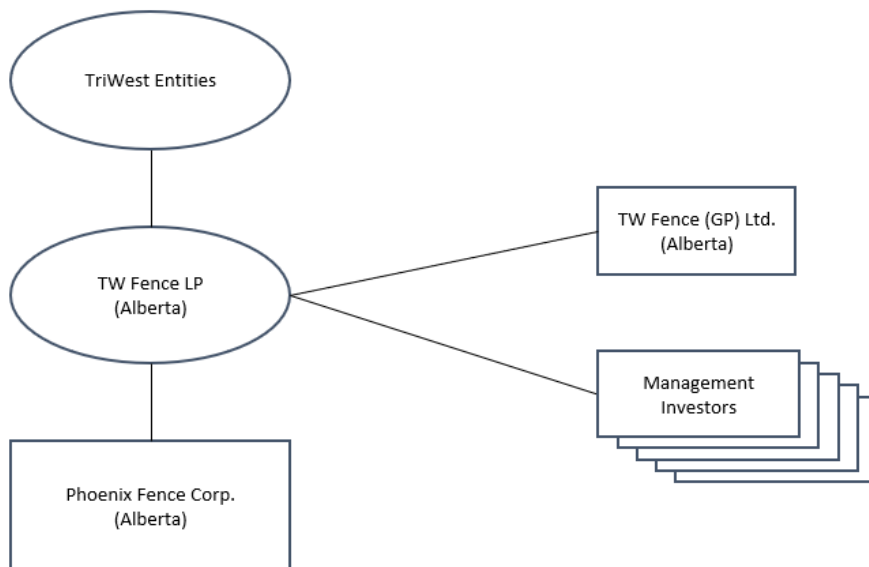
Financial reporting year: 2024

Business Number: 73142 8322

Nature of Business: Manufacture, installation and sale of metal fence systems.

Number of Employees: 146

Other Related Entities: See below organization chart.



Child/Forced Labour Policy

Phoenix Fence Corp (“Phoenix” or “the Company”) endeavours to provide a conducive working environment that is characterized by equality and mutual respect. Phoenix will not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities.

Phoenix is committed to compliance with social standards and requires the same level of commitment from its suppliers. These standards set out the basic rights of employees and guidelines for environmental stewardship based on internationally recognized standards.

Child labour, as defined by the International Labor Organisation (ILO) Convention is “work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under the age of 18 that is hazardous to the physical or mental health of the child.”

- Work that is mentally, physically, socially, or morally dangerous and harmful
- Work that fails to consider compulsory schooling
- Work that prevents children from attending school
- Work that makes it necessary for children to leave school prematurely
- Work that requires children to combine school attendance with long hours and heavy work

In the conduct of its business, Phoenix:

- Will not employ children that fall into the definition as stipulated by the ILO Convention, notwithstanding any national law or local regulation.
- Will comply with all other applicable child labour laws, including those related to wages, hours worked, overtime and working conditions.
- Is against all forms of exploitation of children. The Company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities.
- Expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in the countries wherein they operate. Should violation of these principles become known to Phoenix and not be remediated, Phoenix will take serious action, including discontinuation of the business relationship.
- It is the responsibility of local management and the Phoenix Executive Team to implement and ensure compliance with this policy at all Phoenix operations and facilities.

This policy is to be included in the Company’s onboarding presentation to all new employees.

Preventive Strategy

Phoenix will not tolerate or condone any form of child/forced labour and expects the same of its business partners. Acceptance of Phoenix's policies, which condemn and prohibit all forms of child/forced labour, is a basic prerequisite for establishing a business relationship with vendors.

Phoenix requires its vendors to adhere to its Child/Forced Labour Policy as previously described. Phoenix is focused on strengthening its commitment to responsible and sustainable sourcing through identifying and selecting vendors who share similar values as well as ensuring Phoenix delivers safe and high-quality products to Phoenix's customers.

Risk Assessment

The Phoenix team will perform an annual risk analysis for potential conflicts with our policy within our supply chain.

Supply Chain risk elements:

Category	Risk Description	Risks	Risk Level	Actions	Review Frequency	Last Review
Labour	Use of child/forced labour	Hiring Practices	Low	Adherence to Federal/Provincial employment guidelines	Annual	May 2025
Supply Chain	Canadian suppliers	Materials	Low	Monitor for foreign-produced materials	Annual	May 2025
Supply Chain	US suppliers	Materials	Low	Monitor for foreign-produced materials	Annual	May 2025
Supply Chain	Foreign suppliers in known areas of child/forced labour regions	Materials	High	Contact vendors to determine their child/forced labour policy. Update vendor qualification form	Annual	May 2025
Supply Chain	Other foreign suppliers	Materials	Moderate	Monitor for material produced in high risk regions	Annual	May 2025

Import of Materials

Phoenix will not import materials from unqualified vendors in areas of the world where there is a known high risk of Child/Forced labour.

Qualification of Vendors

Phoenix will investigate vendors to ensure they have a Child/Forced labour policy in place that aligns with Phoenix's ideals and policies. Copies of vendor policies will be filed with their Vendor Qualification Packages. See Table 1 for the list of Phoenix vendors supplying materials from high-risk regions and their policy statuses. If a vendor can not provide a written policy or demonstrate compliance with the Phoenix policy within 6 months of the request then an alternative vendor will be sourced until the vendor complies.

Internal Materials Audit

Phoenix will perform an internal inventory audit to identify materials in our current inventory sourced from known high-risk countries. If any materials are found to be sourced from high-risk countries, an investigation will be undertaken. If required, the vendors who supplying the at-risk materials will be contacted by Phoenix to assess their compliance prior to ordering any additional materials.

Recruitment

The Company will maintain records for all employees in the form of offer letters to demonstrate that all workers have been recruited voluntarily.

Training

Phoenix will ensure all team members involved in procurement of goods are trained in our policies and procedures regarding Child/Forced labour. To ensure that all Phoenix personnel are informed and educated on Child/Forced labour, Phoenix will develop an information package which will be included in the Phoenix employee onboarding package.

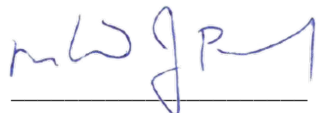
Review

Phoenix will review this policy on an annual basis and update or revise as needed.

This report and Policy can be found on the Phoenix Website <https://www.phoenixfence.ca/>.

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 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. I have the authority to bind Phoenix Fence Corp.



Michael Powell CPA, CA
Chief Executive Officer

May 30, 2025

Date

Table 1**Vendors Contacted May 2025**

Vendor ID	Product Category	Country Of Origin	Risk	Vendor Response
1156	Fittings/Tposts	India	High	Compliant
1292	Fittings	China	High	Compliant
277	Pipe	China/Turkey	High	Compliant
2833	Fittings	China	High	Compliant
3411	Tools/Fittings	China	High	Compliant
3964	Tools	China	High	Compliant
4083	Ornamental Fence	China	High	Compliant
4324	Pipe	China	High	Compliant
4844	Wire	China	High	Compliant
4845	Vinyl Wire	China	High	Compliant
5426	Pipe	China	High	Compliant
4544	Temporary Panels	China	High	Compliant
4941	Fittings	India	High	Compliant
783	Pipe/Wire	China/Malaysia	High	Compliant