



## Modern Slavery Statement 2025

This statement is published in accordance with Bill S-211, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. It details the steps that ClearTech Industries Inc. ("ClearTech") has taken during its previous financial year that ended on September 30<sup>th</sup>, 2024, to prevent any form of modern slavery, including forced labour, child labour, and human trafficking in any of its supply chains and in any part of its own business.

### Introduction

At ClearTech, our core values are essential to our business operations and key to our success. Integrity, Accountability, Embracing Opportunity, Customer-Driven Quality, and Results are the values that foster respectful partnerships internally amongst employees, and externally with customers, suppliers, ownership, and other stakeholders. With these values in mind, ClearTech has cultivated a culture where integrity is central to our business practices, and unethical behaviour is not tolerated.

ClearTech supports sustainable business practices and remains committed to continuously improving our policies to deliver the products and services in a way that our customers expect. This includes recognizing the importance of the human rights, health, and safety of all our employees, suppliers' employees, and customers, and supporting fair and compliant labour practices.

ClearTech supports treating all people with dignity and respect in our workplaces. We are committed to fair employment practices for all employees regardless of race, religion, ethnicity, gender, age, disability, sexual orientation, or any other status protected by law.

ClearTech does not tolerate discrimination, harassment, or abuse, including abuses of labour standards, or any form of modern slavery whatsoever. ClearTech is committed to sourcing products and services from suppliers that provide safe working conditions, treat workers with respect and dignity, and comply with all local laws. We acknowledge and support global efforts to abolish modern slavery and recognize that it can be hidden in many global supply chains, and in turn may also be in our own supply chain.

### Structure, Activities, and Supply Chains

ClearTech is a formulator and distributor of industrial chemicals. We have facilities across Canada and adhere to *Responsible Distribution* codes of practice in the distribution of chemical products, chemical handling equipment, and analytical products.

As a wholly owned private corporation and a member of the PIC Investment Group, ClearTech maintains corporate office based in Saskatoon, Saskatchewan, Canada. ClearTech employs over 150 people with diverse skills and cultures in eight locations across Canada.

ClearTech operates three production and warehousing facilities for manufacturing and storing chemical products:



## Modern Slavery Statement 2025

- Port Coquitlam, BC
- Edmonton, AB
- RM of Corman Park, SK

ClearTech also operates four warehousing facilities for storing chemical, equipment, and analytical products:

- Calgary, AB
- Regina, SK
- Winnipeg, MB
- Mississauga, ON

ClearTech products are used in a wide range of municipal, industrial, and recreational sectors, and are sold Canada directly to end users or through sub-distribution. To be able to produce and distribute these products to our customers, and to operate our business, ClearTech requires various chemical raw materials, packaging materials, technical equipment, building services, transportation services and contractor services, which all depend on having robust and diverse supply chains.

Most of these requirements are sourced from over 250 reputable suppliers located domestically in North America and throughout the world. Suppliers are assessed against several important factors, including health & safety, environmental impact, business values, pricing terms, product quality assurance, service capability, risk level for exposure to modern slavery issues, capacity for growth, and location.

### **Policies and Due Diligence Processes**

ClearTech does not tolerate any form of modern slavery or human exploitation in its operations or supply chains. We are committed to continuously improving our systems, policies, and procedures to identify, assess, and manage risks.

As a founding member of Responsible Distribution Canada, ClearTech is committed to upholding and operating under the guiding principles of the Responsible Distribution Code of Practice.

As part of our commitment to Responsible Distribution, ClearTech adheres to policies and assessment processes designed to ensure that our engagements with suppliers, contractors, employees comply with all laws and regulations and that conduct occurs in a professional and ethical manner, including:

- Equal Opportunity and Eligibility Policy
- Code of Professional Conduct
- Health & Safety Policy
- Attendance & Overtime Policy
- Privacy Policy
- Supplier Assessments
- Contractor Management Policy



## Modern Slavery Statement 2025

- Violence, Bullying and Harassment Policy

Supplier Assessments are regularly updated with relevant questions and criteria, guided by our consultation with the International Labour Organization, to determine if forced or child labour is being used. These assessments are revised as necessary for each vendor.

Once an assessment is completed and returned, a member of ClearTech's Supply Chain and Purchasing team reviews it to evaluate the supplier's responses. We will collaborate with the appropriate individuals to address and remediate any identified risks or human rights violations. Additionally, a qualified employee conducts on-site visits to suppliers periodically, even if no risks have been identified.

### Risk Assessment

ClearTech maintains a high level of visibility and direct control over its operations across Canada. ClearTech ensures safe working conditions and treats all employees with dignity, respect, and fairness, in compliance with all applicable labour laws and with robust policies and controls in place. The company does not employ migrant workers in any of its operations, therefore, the risk of ClearTech causing or contributing to incidents of modern slavery in its operations is extremely low.

ClearTech acknowledges the potential risk of inadvertently contributing to modern slavery practices within its supply chain, particularly through suppliers operating in high-risk countries and industries known for prevalent and prior human rights violations, despite existing local labour laws. The highest risk for ClearTech arises from sourcing of chemical raw materials from suppliers that may operate in or may have their own supply chains connected to the Xinjiang Uyghur Autonomous Region of China ("Xinjiang").

Several resources are utilized to evaluate ClearTech's level of risk of its supply chain being connected to Xinjiang:

- US Customs & Border Protection (CBP) Withhold Release Orders and Findings List
- US Homeland Security UFLPA Entity List
- US State Department Xinjiang Supply Chain Business Advisory
- Global Affairs Canada's Study of Supply Chain Risks to Xinjiang Forced Labour
- US Bureau of International Labor Affairs TVPRA List of Goods Produced by Child Labor or Forced Labor

As of this statement year, ClearTech does not engage with any vendors listed on the referenced lists, nor does it source any high-risk goods identified on the TVPRA list for goods produced by forced or child labour. ClearTech maintains high visibility into its suppliers' operations through strong relationships and long-term partnerships. Through direct questioning, in-person canvassing of suppliers, and the completion of supplier assessments, we have confirmed that we have zero (0) current suppliers that operate in Xinjiang.



## Modern Slavery Statement 2025

By referencing available resources, continuing supplier canvassing, and supply chain mapping of its offshore suppliers, it could be determined that ClearTech's level of risk of causing or contributing to incidents of modern slavery across its supply chains is low. Nonetheless, ClearTech is committed to remaining vigilant and assumes that risks may remain hidden in all its supply chains and will assess each supplier with the same scrutiny.

### Remediation Measures

ClearTech aims to establish transparent business partnerships with all its suppliers and strives to work only with those who pose no risk of modern slavery or human rights violations. If ClearTech becomes aware of any contrary information about a supplier, an investigation will be conducted. Should the investigation reveal deficiencies or violations, ClearTech will document the findings and engage with the supplier to agree on appropriate corrective actions and preventative measures within a suitable time frame. ClearTech will remain involved to ensure effective implementation. Terminating the business relationship with the supplier will be considered if the supplier fails to implement the agreed-upon plans and align with ClearTech's values and goals.

No remediation measures were required for this statement year as zero (0) instances of forced labour or child labour were identified in any supply chains.

### Remediation of Loss of Income

No remediation measures were required for this statement year as zero (0) instances of forced labour or child labour were identified in any supply chains.

### Training

ClearTech is continually integrating human rights related aspects, including modern slavery, into both existing and new policies and processes. Fundamental to managing the risk of modern slavery is raising awareness internally and encouraging all staff to voice any concerns that they may have without any fear of retribution. ClearTech Senior Management is responsible for the training of relevant employees on their roles and responsibilities toward identifying risks and ensuring that operations and supply chains remain free from instances of modern slavery.

### Assessing Effectiveness

ClearTech recognizes the need to continually assess the effectiveness of its actions to address modern slavery risks. We are assessing the effectiveness of our actions by:

- Monitoring the return rate of suppliers who complete and submit updated Supplier Assessment forms, confirming their compliance with efforts to eliminate modern slavery risks.
- Reviewing the information gathered and verified through observations, meetings, and interactions with suppliers during on-site assessments.



## Modern Slavery Statement 2025

- Reviewing the number of investigations conducted in response to complaints or grievances received by employees that resulted in confirmed instances of modern slavery.
- Reviewing the number of suppliers either requiring remedial measures or removed due to non-compliance with laws or regulations on modern slavery and human rights.

Zero (0) breaches were identified and zero (0) investigations were required for this statement year.

### Attestation

*In compliance with the requirements of the Act, particularly section 11, I confirm 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.*

Randy Bracewell  
President  
ClearTech Industries Inc.

May 14, 2025  
Date

**I have the authority to bind ClearTech Industries Inc.**

