



INTERIOR PLUMBING & HEATING LTD.

REPORT PURSUANT TO THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAIN ACTS

MAY 2026





Introduction

Interior Plumbing and Heating Ltd. (IPH) is committed to maintaining ethical, lawful, and transparent business practices across all areas of its operations and supply chains. Operating across Western Canada, IPH recognizes the importance of responsible sourcing and labour practices in the construction industry and affirms its zero-tolerance approach toward any form of exploitation.

IPH expects our suppliers to operate in accordance with all applicable anti-slavery laws, including those prohibiting human slavery and slavery-like practices, human trafficking, forced labour, and child labour, and particularly including Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the Act").

Organization, Structure, and Operations

IPH is a mechanical contractor headquartered in Kamloops, British Columbia, Canada, providing plumbing, heating, ventilation, air conditioning, gas-fitting and related mechanical services to commercial, institutional, industrial and residential clients across Western Canada.

We employ approximately 240 people across our office, shop and field operations, and we engage subcontractors and temporary workers from time to time as project needs require.

Our supply chain is typical of a Canadian mechanical-construction contractor and includes:

- Manufacturers and distributors of plumbing fixtures, fittings, valves, pumps and water-heating equipment;
- Manufacturers and distributors of heating, ventilation and air-conditioning equipment, controls, sensors and refrigerants;
- Suppliers of raw materials including copper tube, steel and stainless-steel pipe, PEX, insulation, sealants and fasteners;
- Subcontracted trades (e.g. specialty welders, controls integrators, insulators, sheet-metal sub-trades);
- Providers of personal protective equipment, uniforms, tools and consumables;
- Fleet, fuel, IT, software, professional services and other corporate-overhead suppliers.

The majority of our direct (tier-1) suppliers are based in Canada and the United States. We recognize that the manufactured goods we purchase often originate from, or contain components from, jurisdictions outside North America, and that the highest modern-slavery risk in our supply chain typically sits in the upstream tiers we do not directly contract with.

Policies and Practices Related to Forced Labour and Child Labour

IPH is committed to maintaining ethical labour practices and ensuring that all business activities are conducted with integrity, respect, and accountability. The company operates under a framework of policies and procedures that support responsible business conduct, including our Forced Labour Policy, Code of Ethics, Subcontractor Pre-Qualification process, Speak Up Channel, and Recruitment and Hiring practices. These measures apply across all areas of the organization and extend to employees, contractors, suppliers, business partners, and other third parties engaged with IPH.

IPH takes a zero-tolerance approach to forced labour and human trafficking and is dedicated to protecting the rights, dignity, and well-being of all workers within its operations and supply chain. The company is committed to complying with applicable labour laws and promoting fair, respectful, and lawful working conditions. Through ongoing oversight of procurement, supply chain management, project operations, and vendor relationships, IPH seeks to ensure that ethical labour standards are upheld throughout all aspects of its business activities.

Risk Assessment Within Business & Supply Chains

We have considered where the risk of modern slavery is most likely to arise in our operations and supply chains. The principal areas of focus are summarized below.

Risk area	Why it matters in our business	Mitigations in place / planned
Imported plumbing & HVAC equipment	Fixtures, valves, pumps, sensors and controls are often manufactured in jurisdictions with elevated forced-labour risk.	Prefer manufacturers with published modern-slavery or supply-chain transparency disclosures; request supplier code-of-conduct attestations on new vendor onboarding.
Raw materials (copper, steel, PEX, insulation)	Upstream extraction and processing of metals and polymers carries documented forced-labour risk in certain regions.	Source primarily through established Canadian distributors; ask distributors about their own supplier-screening practices.
Subcontracted labour	Construction industry uses layered subcontracting, which can obscure labour conditions of workers further down the chain.	Subcontractors are pre-qualified; contracts require compliance with all applicable employment standards, WorkSafeBC, and immigration and human-rights laws; site supervisors monitor working conditions.
Temporary foreign workers / staffing agencies	Workers recruited through third-party agencies are at higher risk of debt bondage, wage withholding and document confiscation.	Use only licensed BC employment agencies; verify workers are paid directly and retain their own identity documents.
PPE, uniforms and consumables	Garments and gloves are commonly produced in higher-risk regions.	Purchase through reputable Canadian safety suppliers; raise modern-slavery expectations as part of vendor reviews.
Fleet, fuel and shop supplies	Lower direct risk, but tier-2 and tier-3 risk exists in vehicle electronics and battery supply chains.	Monitored as part of general vendor review; not currently considered a priority risk area.

Overall, we assess the risk of modern slavery and human trafficking occurring within IPH's own operations as low, given that our workforce is directly employed in British Columbia under provincial employment-standards and occupational-health-and-safety regimes. The more material risk sits in the upstream manufacturing tiers of the goods we purchase, where our direct leverage is limited but where we can exercise influence through supplier selection and contract terms.

Due Diligence Processes

During the reporting period, our due diligence activities included:

- Reviewing the modern-slavery and supply-chain-transparency disclosures published by our major equipment manufacturers and distributors;
- Requiring subcontractors to be in good standing with WorkSafeBC and to confirm compliance with applicable employment legislation as a condition of working with us;
- Building modern-slavery expectations into our standard subcontract and purchase-order terms;
- Verifying directly employed workers' legal right to work in Canada at the point of hire; and
- Operating a confidential channel through which workers, subcontractors and members of the public can report concerns.

Planned enhancements for the next reporting period include issuing a supplier code of conduct; adding a modern-slavery question to vendor onboarding; targeted audits of higher-risk suppliers.

Training & Awareness

We provide procurement risk awareness training so that key staff — in particular those involved in procurement, project management, human resources and site supervision — can recognize warning signs of modern slavery and human trafficking and know how to escalate concerns.

Indicators we train relevant staff to watch for include:

- Workers who do not control their own identity documents;
- Signs of debt bondage or wage withholding;
- Workers who appear to be living at the worksite involuntarily;
- Restricted freedom of movement; and
- Recruitment fees paid by workers to obtain employment.

Measuring Effectiveness & Continuous Improvement

We measure the effectiveness of our approach using indicators including:

- Number of subcontractors and suppliers that have confirmed alignment with our labour-standards expectations;
- Number of modern-slavery-related concerns raised through our reporting channels, and how they were resolved;
- Completion rates for relevant staff training;
- Inclusion of modern-slavery provisions in new and renewed subcontracts and purchase orders.

During the reporting period no reports of modern slavery were received.

Our priorities for the coming year are to:

- Formalize a written Supplier Code of Conduct addressing modern slavery, child labour and ethical recruitment;
- Add a modern-slavery screening question to our standard new-vendor onboarding process;
- Deliver refreshed training to procurement, HR and project-management staff;
- Review this Statement annually and update it to reflect what we have learned.

Attestation

This report has been approved by the senior leadership team of Interior Plumbing and Heating Ltd.

In accordance with the requirements of the Act, particularly Section 11, I attest that I have reviewed the information contained. Based on my knowledge, and having exercised reasonable diligence, I attest that the information contained in this report is true, accurate, and complete in all material aspects of the Act for the reporting year of January 1, 2025, to December 31, 2025.

Signed, the 19th day of May 2026 by Jeremy Hole, Director of Construction and COO of IPH.

Jeremy Hole, Director of Construction and COO