

Modern Slavery Report for Levitt-Safety Limited

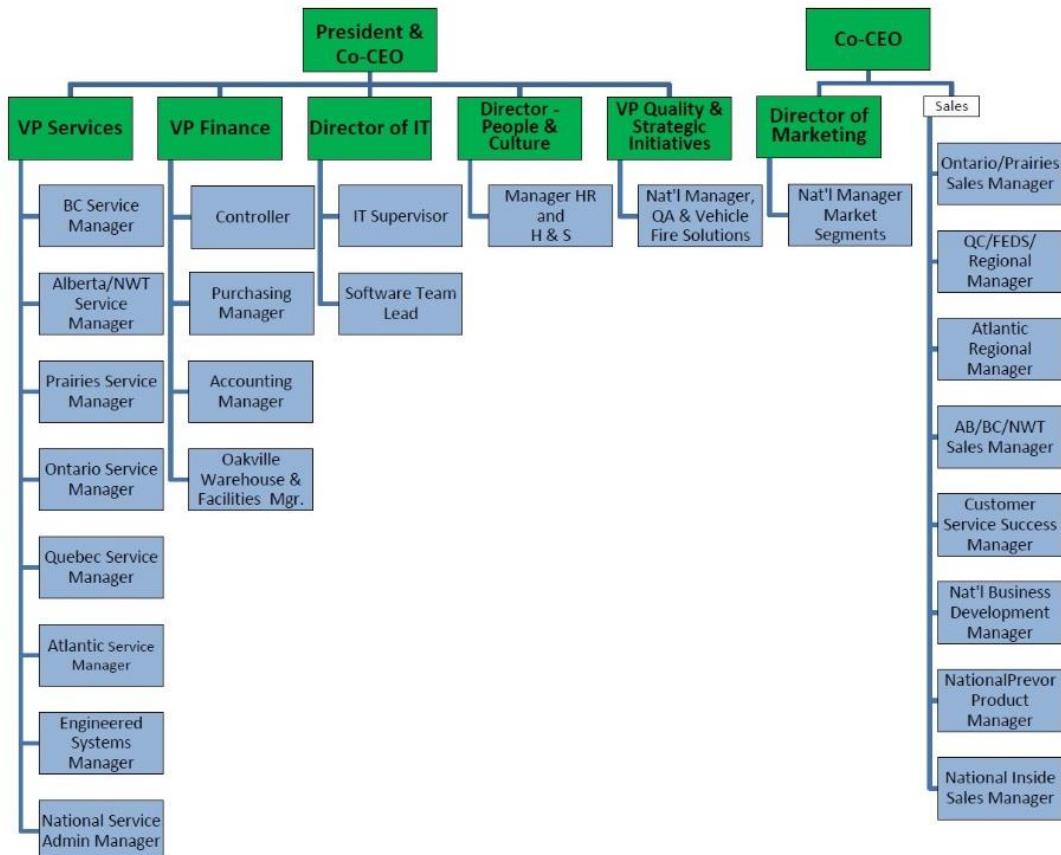
Introduction

This report is prepared and updated in accordance with the requirements of Canada's Bill S-211, aimed at combating modern slavery. Levitt-Safety Limited is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and our supply chain. This report outlines the steps we've taken during the fiscal year ending December 31, 2024.

Company Overview

Levitt-Safety Limited is a privately owned corporation engaged in the sale, rental, design, assembly, distribution, installation, training, consulting, inspection, maintenance and repair of fire, safety and environmental products, software, and services across Canada. We employ almost 400 employees in 18 branches from coast to coast. The company is organized according to the chart in Figure 1.

Figure 1: Organization Chart





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In 2024, Levitt-Safety started a project to reduce the number of vendors in our system to those that are the most active and relevant based on the strategic importance of the vendors' product line and our order history with the vendors. The project has extended into 2025. So far, Levitt-Safety has 282 trade partners with revenues above \$5000 annually. Of those vendors, 200 are based in Canada, 71 in the United States, nine in Western Europe and two in Asia.

Policies in Relation to Slavery and Human Trafficking

In 2024, management maintained our Modern Slavery Policy Statement without revision since it accurately outlines our goals and values. This statement continues to be used as the basis of our internal procedures and training programs. It is included in our Employee Guide and is published on our local intranet, which can be accessed or shared with all new and existing employees, and on Levitt-Safety.com.

Levitt-Safety also maintained our Business Code of Ethics without revision.

Due Diligence Processes for Slavery and Human Trafficking

In 2024, Levitt-Safety did not find any evidence of modern slavery within our supply chain and as a result did not undertake any remediation activities to date.

Risk Assessment through Sedex: Using the resources provided through our Sedex membership, the purchasing team investigated four potential Personal Protective Equipment suppliers with manufacturing facilities in higher risk areas. Two were doing business in Pakistan, and one each in Bangladesh and Taiwan. The results of the investigation showed that all four companies present much more social risks than benefits, so all four were rejected. (Refer to Figure 2.)

We also completed the comprehensive Self Assessment Questionnaires (SAQ) within Sedex for our corporate headquarters and our subsidiary manufacturing site, Northern Light Technologies (NLT). The SAQ is the basis for the social audit program Sedex Members Ethical Trade Audit (SMETA) that measures businesses according to four pillars: Labour Standards, Health and Safety, Business Ethics, and Environment. The SAQ arrives at a balanced risk score based on location, business sector, and the Management Controls in place to mitigate risks in all four pillar categories. The 2024 score for Levitt Safety 4.0 which is considered a low risk. NLT scored a little higher risk at 4.9 due to a higher risk in the Environment category.

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Figure 2: 2024 Sedex Risk Analysis of Potential PPE Vendors

Vendor	Product Offering	Location	Inherent Risk	Site Risk	Combined Risk	Observations	Recommended Actions
Swiss Po Sports Mfg Co PVT Ltd	Gloves	Pakistan	7.7	4.6	6.2	Based on SAQ scores, Labour standards =7.9, Heath and Safety = 7.6, Business Ethics = 7 and Environment =7.5	Do not approve, high risk and low benefit to switch from current vendors
Globe Safety Manufacturing	Gloves and other PPE	Bangladesh	7.9	5.4	6.7	Audited by independent third party April 2023. Labour standards = 8.5, Heath and Safety = 7.3, Business Ethics = 8 and Environment = 6.8	Do not approve, high risk and low benefit to switch from current vendors
TONSHUNG TECHNOLOGY COMPANY LIMITED	Eyewear	Taiwan	4.6	10	7.3	Based on SAQ scores, Labour standards =4.1, Heath and Safety = 6.7, Business Ethics = 3.9 and Environment =5.4. Management Controls were not disclosed leaving as risk score of 10.	Do not approve. Review again at a later date to see if Management Controls data is added or sponsor a 3rd party audit to be done on site.
NOOR LEATHER GARMENTS (PVT) LTD	Gloves	Pakistan	7.9	10	10	Vendor claimed that they were Sedex members but their membership expired.	Do not approve, extreme high risk and very low benefit to switch from current vendors

Sedex Risk Categories

Risk scoring scale scored out of 10. A higher score means higher risk.



Inherent Risk	Site Risk	Combined Risk
Predicts potential risks based on country, region and business sector. It includes responses to the company's self assessment questionnaire scores in labour standards, Health and Safety, Business ethics and Environmental practices. Used as a baseline to determine risk. Scored from 0-10 with 10 being the highest risk.	Assesses the suppliers' self-assessment questionnaire responses based on the rating of the Management Controls in place to manage the Labour Standards and Health and Safety risks in particular. This measure is useful in determining the level of support and implementation of processes that lower risk factors on site. Scored from 0-10 with 10 being the highest risk.	The average of the Inherent Risk and Site Risk scores, this measure assesses the suppliers' performance after Management Controls to mitigate the risk is taken into consideration. The accuracy of this measure increases as more data is collected. Scored from 0-10 with 10 being the highest risk.

Early in 2025 Sedex launched a new tool, the Environment Self Assessment Questionnaire, that greatly expands on sustainability controls within the Environment section. It covers policies, targets, management controls, monitoring,



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reporting and engagement activities, and gathers data on GHG emissions, waste, energy, chemical and water management, biodiversity and deforestation. This survey may provide guidance on how the company can improve our environmental programs going forward. Once training in how to use this new tool is completed the questionnaire can be helpful to guide and evaluate the effectiveness of our environmental programs mature going forward.

We were also able to make connections to two of our own customers through the Sedex network, Canadian National Laboratories and Compass Minerals. We have yet to take full advantage of these customer connections as we have focussed on our supplier network instead. Efforts to make other connections both for customers and vendors are underway, however, we are finding that most of the Sedex members are predominantly in Europe or Asia and very few North American companies are using the platform. We have explored this issue with the Sedex team, and they have offered to assist with our supplier mapping and connection with other companies through their consulting services.

Risk Assessment through in-person supplier audits: In October 2024, the Purchasing Manager travelled to Asia to perform site visits on two potential suppliers: [Dropsafe](#), for drop prevention barriers, and [Yangon Panatex Apparel Company](#) for safety garments. Dropsafe has its head office in Hong Kong and manufacturing facilities in mainland China, while Yangon has two factories located in Myanmar. This review included guided tours of the factories, meetings with their senior management, human resources, sales, and production teams. As a result of the investigation, it was decided that there were more risks related to both companies than the potential benefits warranted.

In 2025, the plan is to work together with an existing vendor, IFR Workwear out of Red Deer, Alberta, which is a supplier of flame resistant and other safety related clothing to explore their Mexico and Bangladesh facilities.

Training and Capacity Building:

The vendor vetting and onboarding, and vendor performance monitoring processes within our ISO 9001 Quality Management System have been improved upon in 2024 to take modern slavery into consideration as part of our regular process. Several of the buyers are also now trained to use the risk assessment tools available in the Sedex platform. In 2025, we will review our contractor prequalification process to see how we can make it easier to analyse any modern slavery risks from external resources that we hire to support our business. The purchasing department will also create and maintain a Supplier Code of Conduct to explain our values and expectations regarding social and environmental sustainability and share it with all our existing vendors as well as potential new vendors.



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Effectiveness in Combating Slavery and Human Trafficking

Levitt-Safety has an effective system for managing these risks internally by practicing and keeping our employees focussed on all aspects of our Face of Levitt-Safety Fundamentals in everyday activities.

The senior management team continues to demonstrate their commitment to reviewing our environment, social, and governance policies annually as part of our regular management review and business planning meetings.

Endorsement

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 Levitt-Safety Limited. 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 fiscal period ending December 31, 2024.

I have the authority to bind Levitt-Safety Limited.

Full name Bruce Levitt Title: President Date: May 16, 2025

A handwritten signature in black ink. The signature starts with "Bruce" on the left, followed by a stylized surname that appears to begin with "Levitt". The signature is fluid and cursive.

Signature