



2024

Wright

Modern Slavery Report

Prepared by: **Wright** Construction Western Inc.



Our Values

We put people first. We do the right thing. Period. Relationships form our foundation. Our promise is our most vital product. Every challenge is an opportunity for success.

Wright

This Modern Slavery Report has been created by Wright Construction Western Inc. in accordance with the Modern Slavery Act in Canada.

Saskatoon | Regina | Calgary

wrightconstruction.ca

Our Mission



**Building people and communities
together since 1905**

As President/CEO of Wright Construction Western Inc., I want to acknowledge the significance of the Modern Slavery Act in Canada and reiterate our dedication to combatting modern slavery in all its forms.

The Modern Slavery Act signals our collective obligation to uphold the fundamental rights and dignity of every individual within our supply chains and beyond.

At Wright Construction Western Inc., we recognize that the construction industry, with its complex and extensive supply chains, is particularly susceptible to the risks of modern slavery. We understand the gravity of this issue and accept our responsibility to be part of the solution. It is not enough for us to simply comply with legal requirements; we must strive for excellence in ethical sourcing and labor practices, setting a standard of integrity and compassion for others to follow.

As we move forward, I want to reaffirm our commitment to transparency, accountability, and continuous improvement. We will continue to strengthen our anti-slavery policies, enhance our due diligence processes, and engage with our suppliers, partners, and stakeholders to promote ethical practices and protect human rights.

Our journey to combat modern slavery is a journey of collaboration and collective action. It requires the commitment and dedication of each and every member of our team. Together, we have the power to make a positive difference and create a future where exploitation and injustice are relics of the past.

Let us continue to stand united in our pursuit of a world free from modern slavery.

I am providing this attestation in my capacity as a director and officer of Wright Construction Western Inc. and not in my personal capacity.

Lorne Wright
President & CEO



Introduction and Company Overview

Wright Construction Western Inc. (Wright) is a general contracting company. Established in 1905, it represents the longest operating construction company in Saskatchewan. Our operational headquarters is located in Saskatoon, SK with branch offices located in Calgary, AB and Regina, SK. We employ over 70 office staff, while our field staff fluctuates between 170 – 250.

Wright currently operates in all Western Canadian provinces. Our experience encompasses a wide range of commercial projects and sectors: office buildings, retail, warehouses, educational buildings, healthcare, civic buildings, recreational facilities, and light industrial.

Understanding Modern Slavery

At Wright Construction Western Inc., we recognize that modern slavery can take many forms, including indentured servitude, human trafficking, forced labor, and child labor. In the construction industry, the risks are particularly high due to:

Exploitation of Migrant Workers: Vulnerable due to language barriers and legal status.

Subcontractor Labor Abuses: Complex supply chains can hide poor working conditions.

Human Trafficking in Supply Chains: Risks in sourcing materials from regions with forced labor.

Temporary and Informal Work: Job insecurity can lead to exploitation.

We are committed to addressing these risks through thorough vetting of subcontractors, regular audits, employee training, and ethical sourcing practices, ensuring the rights and dignity of all individuals involved in our projects.

Governance

At Wright Construction Western Inc., we are dedicated to upholding high ethical standards and human rights in all aspects of our business. Our procurement process includes fair labor practices, human rights, and ethical business conduct. We emphasize safe, inclusive, and respectful work environments, adherence to international human rights standards, and transparency in all dealings.

Suppliers are expected to prevent forced labor and human trafficking, uphold labor rights by providing fair wages, safe conditions, and reasonable hours, and maintain transparent business practices. We will regularly audit suppliers to ensure compliance, addressing any violations promptly. Wright Construction Western Inc. is committed to ethical practices and preventing modern slavery in all operations and supply chains.

Wright Construction Western Inc. upholds governing standards including:

Fair Labor Practices: Ensuring a safe, inclusive, and respectful work environment.

Human Rights: Adhering to international human rights standards.

Ethical Business Conduct: Maintaining transparency, honesty, and integrity in all dealings.

Prevent Forced Labor and Human Trafficking: Ensure operations are free from forced labor.

Uphold Labor Rights: Provide fair wages, safe working conditions, and reasonable hours.

Promote Transparency: Maintain transparent business practices.

Any violations will be addressed promptly. Wright Construction Western Inc. is dedicated to ethical practices and preventing modern slavery in all operations and supply chains.

Supply Chain Management

Wright Construction Western Inc. upholds a comprehensive set of values, including: We have carefully reviewed the Modern Slavery Statement of our main supplier of imported goods and are comfortable with them. Our suppliers' commitment to ethical practices aligns with our own values, and we are assured by their efforts to ensure that their hiring practices and supply chain sourcing adhere to the highest standards of integrity. They demonstrate a proactive approach in selecting reputable and safe sources for materials and labor, further solidifying our confidence in our partnership.

Risk Assessment

Wright Construction Western Inc. has established a process for identifying and assessing modern slavery risks within its operations and supply chain. This involves:

Risk Assessments

Thorough risk assessments will be conducted across various stages of construction projects to identify potential vulnerabilities and mitigate risks associated with modern slavery.

Supplier and Subcontractor Relationships

We will evaluate relationships with suppliers and subcontractors to identify any potential risks. This will include assessing recruitment practices, labor conditions, and adherence to ethical standards throughout our supply chain.

Wright Construction Western Inc. remains committed to proactively identifying and addressing modern slavery risks across its operations and supply chain, promoting ethical conduct and human rights in all aspects of its business. We are not aware of any instances of our suppliers engaging in acts that are not compliant with the Modern Slavery Act.

Employee Training and Awareness

At Wright Construction Western Inc., we emphasize the importance of addressing modern slavery concerns through training and awareness initiatives. Our programs equip employees with the necessary knowledge to identify and address potential risks effectively. Through these efforts, we strive to maintain ethical standards throughout our operations.

We are committed to staying informed of legislative developments and continuously review and update our policies and procedures accordingly. This ensures that our practices remain in alignment with evolving legislation and best practices in preventing modern slavery.

Our annual policy reviews with employees include a comprehensive review of these aspects, ensuring they are consistently reminded of our zero-tolerance policy towards modern slavery and are equipped with the latest information to uphold ethical standards in their roles.

Effectiveness Assessment

Wright Construction Western Inc. addresses how it monitors and evaluates the effectiveness of its efforts to prevent modern slavery. This includes reviewing supply chain transparency, conducting audits or assessments of supplier compliance, and seeking feedback from both employees and stakeholders regarding the company's anti-slavery initiatives.

Moreover, we remain vigilant and responsive to governmental guidance on compliance standards, ensuring that our practices align with evolving regulations and best practices in combating modern slavery. Through these comprehensive measures, we ensure that our strategies remain robust and continuously improve to combat modern slavery effectively.

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 or entities 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 am providing this attestation in my capacity as a director and officer of Wright Construction Western Inc. and not in my personal capacity.



Lorne Wright
President & CEO
May 31, 2024

I have the authority to bind Wright Construction Western Inc.

Wright