

## **Introduction**

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains and to amend the Customs Tariff Act. This statement outlines the approach and initiatives taken by R.W. Tomlinson Ltd. to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing November 1, 2022 and ending October 31, 2023. This is a joint report on behalf of R.W. Tomlinson Ltd., Tomlinson Environmental Services, and 2839034 Ontario Inc., operating as Material Supply and Logistics (collectively “The Tomlinson Group”).

## **Commitment**

The Tomlinson Group is committed to respecting human rights and ensuring that forced labour and child labour is not a part of the products within its supply chain.

## **Structures, Activities and Supply Chains**

R.W. Tomlinson Ltd. is the parent company of Tomlinson Environmental Services Limited and 2839034 Ontario Inc., operating as Material Supply and Logistics. A diagram of the Tomlinson’s Group structure is provided below.



R.W. Tomlinson Ltd. was established in 1952 to provide construction services, to produce, to distribute, and to sell construction materials, including but not limited to aggregates, asphalt, and concrete.

Tomlinson Environmental Services Limited was established in 2006 for all services relating to solid waste, industrial waste, emergency response, and portable toilet rentals.

2839034 Ontario Inc., operating as Material Supply and Logistics was established in 2021 for the procurement and distribution of construction materials, supplies and small equipment rentals.

Most of the Tomlinson Group's direct vendors are located in Canada, and the other vendors are located in the United States of America. The Tomlinson Group's supply chain primarily consists of vendors related to the procurement of heavy machinery, machine parts, raw materials and supplies for construction use and fuel. The Tomlinson Group recognizes that these suppliers may have in turn purchased goods originating, remanufactured, or distributed from other countries.

### ***Policies and Due Diligence Procedures***

The Tomlinson group's employee handbook contains an overarching principle of treating all employees fairly, with dignity and respect throughout all its business activities. There are policies within that include a minimum age requirement policy for all employees, and for employees whose work requires the operation of a motor vehicle to present a valid driver's license.

### ***Steps Taken in Prior Financial Year***

The above policies and due diligence procedures were in place throughout 2023. The Tomlinson Group did not take any other steps specific to forced and child labour prevention in the 2023 fiscal year.

### ***Risk Identification***

The Tomlinson Group completed an initial review of the international imports received throughout November 1, 2022 and October 31, 2023. During the period in review, the Tomlinson Group directly imported parts, inventory, capital and rental equipment, all of which were from suppliers located in the US. Of the suppliers who imported from the US to Canada, the country of origin was mostly from the US, with some imports coming from Germany, China, India, and Taiwan.

Based on the countries of origin, a further review of the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour from 2022, China, India, and Taiwan were identified as potential risks of forced labour and child labour.

Based on its review of direct suppliers, The Tomlinson Group's has concluded that there is a low risk of forced labour and/or child labour in the immediate supply chains.

### ***Remediation Actions***

The Tomlinson Group has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.





***References***

[List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)