**Buxton Legacy Trust and Tonux Inc.** 

2023 Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

#### Introduction

This report has been prepared jointly by Buxton Legacy Trust ("**BL Trust**") and Tonux Inc. ("**Tonux**") in response to the requirements under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the **Act**"). The prior financial reporting year for BL Trust ended on December 31, 2023 (the "**Reporting Period**"). The prior financial reporting year for Tonux ended on August 31, 2023.

Applicability of the Act is based on both BL Trust and Tonux having a business presence (i.e., place of business, business activities, and assets) in Canada as well as meeting the financial thresholds related to assets and revenue as set out by the Act, through their respective holdings. BL Trust and Tonux are not subject to reporting requirements under supply chain legislation in jurisdictions outside of Canada, and this report is therefore structured to meet the requirements of the Act.

## Organizational structure, activities, and supply chain

The Act requires BL Trust and Tonux to report on our activities in relation to controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods.

BL Trust is the sole common shareholder of Tonux. Tonux is the sole common shareholder of Black Cat Wear Parts Ltd. ("BCWP"). BCWP is a manufacturer and distributor of ground engaging tools for the construction, mining, and road maintenance markets, operating in Canada. BCWP is engaged in producing, selling and distributing goods in Canada and outside Canada, and importing into Canada goods. BCWP is a reporting entity under the Act and has filed a separate report.

BL Trust and Tonux are privately held entities with headquarters in Edmonton, Alberta, Canada.

# Steps to prevent and reduce the risks of forced labour and child labour

In the Reporting Period, BL Trust and Tonux did not take any specific steps to prevent and reduce the risks of forced labour or child labour in our operations and supply chain.

# Policies and due diligence processes

BL Trust and Tonux have not developed or implemented policies or due diligence processes specific to identifying, addressing and prohibiting the use of forced labour and child labour in our activities and supply chain.

#### Forced labour and child labour risk

In the Reporting Period, BL Trust and Tonux did not identify any risks of forced labour or child labour in its activities or supply chains.

## Remediation measures and remediation of loss of income

In the Reporting Period, BL Trust and Tonux did not receive any complaints relating to forced labour or child labour in our operations or supply chain, and as such has not taken any remediation measures.

# **Employee training**

In the Reporting Period, BL Trust and Tonux did not conduct any employee training specific to the prevention and reduction of the risk of forced and/or child labour.

## Assessing effectiveness

In the Reporting Period, BL Trust and Tonux did not have specific measures in place to assess the effectiveness of its efforts to reduce the risks of forced or child labour in its business and supply chain.

## Approval and 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.

Dated in the City of Edmonton, Alberta, this 31 day of MAY, 2024.

Jim Buxton, President

I have the authority to bind Buxton Legacy Trust