



Cavalier Tool
& MANUFACTURING LTD.

3450 Wheelton Dr. Windsor, Ontario N8W 5A7
Windsor Phone: (519) 944-2144 Fax: (519) 944-2486
US address: 4401 Stecker Ave. Dearborn, MI 48126 US Phone: (313) 961-4159

Visit our web site at – <http://www.cavaliertool.com>

Cavalier Tool & Manufacturing Ltd.

BILL S-211

2023 Report



Table of Contents

Introduction.....	3
Section A: Structure, Activities, and Supply Chains.....	4
Section B: Policies and Due Diligence Processes.....	4
Section C – Forced Labour and Child Labour Risks.....	5
Section D – Remediation Measures.....	6
Section E – Remediation of Loss of Income.....	6
Section F – Training.....	6
Section G – Assessing Effectiveness.....	7
Attestation.....	7

Introduction

The following report has been created by Cavalier Tool & Manufacturing Ltd. in alignment with section 11 of Bill S-211 for the financial year ending November 30th, 2023. The entity covered by this report is Cavalier Tool & Manufacturing Ltd. (Business Number: 100846609).

Cavalier Tool & Manufacturing Ltd. satisfies the requirement of being a reporting entity under the act by having a place of business in Canada, doing business in Canada, and having assets in Canada. In addition, Cavalier Tool & Manufacturing Ltd. meets two out of the three size-related thresholds for revenue as well as for importing and distributing goods.

Cavalier Tool & Manufacturing Ltd. emphasizes its dedication to transparency, honesty, and integrity in all supply chain and operating activities. Compliant with Bill S-211, this report outlines and details the steps taken by Cavalier Tool & Manufacturing Ltd. to manage and mitigate potential risks related to child labour and forced labour within its operations.

Section A: Structure, Activities, and Supply Chains

Cavalier Tool & Manufacturing Ltd. is a Canadian entity headquartered in Ontario, Canada.

We are a global manufacturer of mid to large-size molds for the automotive, commercial, recreational, and agricultural industries. For nearly 50 years, Cavalier Tool & Manufacturing Ltd. has been working with customers within Canada and internationally on services such as design and product development, mold flow, mold manufacturing & modification, mold repair services, and start-up / small production services.

Cavalier Tool & Manufacturing Ltd. has three manufacturing plants within Canada and three design locations in India, two in Chennai and one in Lucknow.

Section B: Policies and Due Diligence Processes

At Cavalier, upholding ethical standards across our operations and supply chain is a foundational principle. Our commitment to ethical conduct, in tandem with our focus on fostering strong vendor relationships, serves as a preventative measure against potential risks such as forced or child labour and other unethical practices within our operational and supply networks.

During the previous fiscal year, Cavalier did not have a formalized due diligence policy specifically targeted at managing and mitigating the risks of forced or child labour within its operations and supply chain. However, Cavalier deliberately collaborates with reputable vendors, inherently minimizing the likelihood of encountering unethical labour practices. We have also performed in-person supplier site visits within China and India to gain knowledge of our supply partners' operating activities and understanding their alignment with our organizational values and ethical conduct.

Cavalier Tool & Manufacturing Ltd. is committed to maintaining moral standards throughout our operations and supply chain. Our focus on ethical business conduct, in combination with building trustworthy supplier relationships, provides inherent protection against the risks of forced or child labour and other unethical practices within our operating activities and supply chain.

Section C – Forced Labour and Child Labour Risks

To isolate potential instances of forced or child labour within our supply chain and operations, we recently conducted a meticulous risk assessment utilizing insights drawn from the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and the US Department of Labour’s List of Goods Produced by Child Labour or Forced Labour.

This risk assessment does not assume the presence of forced or child labour within our operations or supply chains; instead, it seeks to identify potential situations where such risks could arise, enabling Cavalier Tool & Manufacturing Ltd. to implement effective preventive measures. Our assessment acknowledges the widespread threat of forced and child labour across industries and recognizes vulnerabilities within specific sectors of our supply chain, particularly in regions with less stringent regulatory frameworks and enforcement mechanisms.

The analysis directed attention to specific geographic areas identified by the Walk Free Global Slavery Index and other authoritative references as having an increased likelihood of forced and child labour occurrences. This assessment of geographic risk was bolstered by an evaluation of product categories considered to be at risk, thereby enhancing the accuracy of our risk assessment process.

Risk Assessment Findings

Through the geographical risk analysis from the available supply expenditure in the previous fiscal year, Cavalier Tool & Manufacturing Ltd. identified its suppliers in three countries — Canada, United States, and China. Imports from Canadian suppliers accounted for a majority of our supply expenditures followed by United States and China. All reviewed countries within our import portfolio present a low risk of the potential prevalence of modern slavery, according to the Walk Free Global Slavery Index. The exercise was conducted on information that was best available for scrutiny at the time of the assessment, and Cavalier understands that the proportion of expenditure by country can change as we work together with our suppliers to gather more information on sourcing for transparency and compliance. We no less, wish to consider these risks seriously.

In addition, we analyzed data sourced from the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour. This assessment plays a critical role in pinpointing particular items within our imported goods that could be vulnerable to forced or child labour. Following a comparison of this data with our reviewed imported products, we found no indications suggesting an increased likelihood of association with forced or child labour practices.

In summary, our risk assessment findings suggest a low level of exposure to forced and child labour risks within our supply chain relative to total expenditures. However, this does not diminish our commitment to effectively identifying and managing risks through our risk management protocols and policies.

Section D – Remediation Measures

In the previous fiscal year, there were no identified instances of forced labour or child labour within our supply chain and operating activities, thus no remediation measures were necessary or implemented.

Looking forward, we will work closely with our suppliers to strengthen our ability to detect any occurrences of forced or child labour within our operations or supply chains and implement necessary remedial actions as appropriate.

Section E – Remediation of Loss of Income

In the previous fiscal year, no instances of forced or child labour have been identified within our operations or supply chains. As a result, no measures have been implemented to address income loss among vulnerable communities.

Section F – Training

In the previous fiscal year, Cavalier Tool & Manufacturing Ltd. did not provide mandatory or voluntary training to employees regarding the company's code of conduct, particularly concerning forced and child labour in the supply chain.

Section G – Assessing Effectiveness

While we previously did not have specific formalized policies and procedures for assessing the effectiveness of preventing forced labour and child labour in our operations and supply chains, our commitment to implementing more robust measures remains steadfast. We are prepared to enhance our approach should concerns arise or as industry standards evolve.

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.

Full Name: Brian Bendig

Title: President

Date: May 30 / 24

Signature: Brian Bendig

“I have the authority to bind ‘Cavalier Tool & Manufacturing Ltd.’”