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## Modern Slavery Act Report for the Fiscal year ended November 25, 2023

Modern slavery and human trafficking are fundamentally at odds with our mission and values. At Fort Garry Industries Ltd. (FGI), we are staunch supporters of the principles and laws outlined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act. We not only adhere to these standards ourselves but also expect our employees and subsidiaries to uphold all laws and regulations. If these expectations are unmet, we are committed to appropriate action.

This report serves to outline the proactive measures we have taken to combat modern slavery and our plans for future enhancements. At FGI, we are dedicated to operating in full compliance with all relevant laws. We actively seek out suppliers who share our values and commitments, ensuring that our business relationships are built on a foundation of ethical sourcing.

### **Our Company Structure, Activities, and Supply Chain**

- FGI is a corporation; Established in 1919
- FGI is headquartered in Winnipeg, Manitoba
- FGI has over 450 employees

We are Canada's leading distributor of aftermarket parts, trailers, equipment, and service to the Canadian Heavy-Duty Truck & Trailer Transportation Industry. We supply parts and services to major truck and trailer fleets, repair shops, mobile repair, construction, waste management, bus fleets, utility companies, the agriculture community, tire shops, municipalities, and mining operations. We are a one-stop shop in the heavy-duty industry dedicated to offering the best customer service.

### **Our Business Segments**

**Aftermarket Parts and Service.** Fort Garry Industries supplies heavy-duty OEM and aftermarket parts to the Canadian Heavy-Duty Truck and trailer Transportation Industry.

**Original Equipment and Trailer Sales.** We carry a host of new and used heavy-duty trailers. Fort Garry Industries has a wide selection of truck-mounted equipment and accessories.

### **Supply Chain**

At FGI, we are acutely aware of the potential risks of forced labour and child labour in our global supply chain and the industries in which we operate. We recognize that the greatest risk of modern slavery and human trafficking exists in our supply chain, as we do not manufacture our own products. We take our role in fostering a responsible supply chain seriously, starting with our supplier selection process and continuing through our ongoing procurement practices. We work with nearly 1,000 vendors, with approximately 10% considered major vendors. Roughly 1% of our vendors are based outside of Canada and the U.S.

## **Our Policies to Combat Modern Slavery**

We believe in a respectful culture to earn the trust of our customers and employees. The Board of Directors oversees the management of culture and conduct. They approve governance frameworks and policies and ensure the adoption of best practices.

### **Supplier Code of Conduct**

Our Supplier Code of Conduct requires suppliers to abide by applicable employment standards and labour and human rights legislation. Where we are satisfied that a supplier's policies and procedures are at least equivalent to our Supplier Code, we may accept a supplier's commitment to comply with their own policies and procedures. Due to the breadth of our supply chain, we cannot check every relationship. Accordingly, we will monitor compliance by suitable levels of due diligence according to our assessment of the risk of the potential for modern slavery and/or child labour.

### **Children in the Workplace Policy**

We have developed a Children in the Workplace Policy for all FGI staff.

### **Illegal Labour Policy**

We have developed an Illegal Labour policy. Training will be provided to all Managers, and they will be required to sign off on the policy.

### **Remediation and Training**

Our employees are trained in key ethical and human rights topics. All policies are available to employees during their employment if they require access. If the policies change, notifications are sent to all employees to advise them to reread and become familiar with them. We'll require all employees to report actual or possible misconduct to their manager or Human Resources.

In 2024, we intend to provide training to all Managers at all locations of Fort Garry Industries to identify and report possible cases of forced labour and child labour.

In 2024, we intend to provide mandatory human rights training for staff whose roles require them to interact with our Suppliers.

### **Ongoing Evaluation**

We intend to assess and refine key performance indicators to measure our commitment to our statements and policies related to human rights. We intend to screen all suppliers to assess activities that would violate our Supplier Code of Conduct.

### **Conclusion**

Fort Garry Industries is committed to preventing modern slavery and human trafficking within our company and in our supply chains.

## Certification

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act and, in particular, section 11 thereof, I attest that I have reviewed the information contained in the report for the entity 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.

Signed by:

A handwritten signature in black ink, appearing to read 'R. Spitzke', with a large, stylized flourish at the end.

Robyn Spitzke  
President, Fort Garry Industries Ltd.

May 22, 2024