



September 30, 2024

**Re: Fighting Against Forced Labour and Child Labour in Supply Chains Act**

Entity Name: LBX Company, LLC  
Financial Reporting Year: January 1, 2023 to December 31, 2023  
Revised Report: No, this is the initial report  
Business Number: 86516 5161 RC0001  
Joint Report: No  
Other reporting obligations: No  
Entity Structure: LBX Company is an American business that does business in Canada.  
LBX Company has at least C\$ 20 million in assets for at least one of its two most recent financial years and has generated at least C\$ 40 million in revenue for at least one of its two most recent financial years.  
Entity Organization: Sales and Support  
Entity Location: Headquartered in Lexington, Kentucky, USA.

LBX Company, LLC (“we”, “company”, “our”, “LBX”) develops, markets, sells, and supports excavators, material handlers, and forestry equipment sold under the “Link-Belt” brand name. Our machines (produced in Japan and Indonesia; consisting of excavators, material handlers, and forestry equipment) and most of our service parts are procured from our parent company, Sumitomo (S.H.I.) Construction Machinery Co., Ltd. located in Japan. Our parent, Sumitomo Construction Machinery Co., Ltd., is a subsidiary of Sumitomo Heavy Industries, Ltd. (SHI), a publicly traded company in Japan.

While no comprehensive investigation has been conducted of our supply chain, we are of the opinion that the probability of encountering forced labor or child labor is low and poses minimal risk.

During 2023, LBX Company, LLC did not identify any forced labor or child labor in its business operations or supply chains. Also, we did not identify any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labor or child labor in our activities and supply chains.

Consequently, LBX Company, LLC did not take any remedial action to specifically address the issues noted above. Further, we have not provided training to our employees with a focus on forced labor or child labor.

Please note that Sumitomo Heavy Industries is committed to the global issue of forced labor and child labor as addressed in section 2 of their [CSR Procurement Guidelines \(Overview\)](#), (shown below).

1. Fair and equitable competition and transactions and thorough attention to compliance
2. Human rights, labor, and health and safety
  - a. Compliance with labor laws and regulations
  - b. Respect for human rights and prohibition of unfair discrimination, labor, and harassment**
  - c. Prohibition of child labor and forced labor**
  - d. Occupations health and safety
  - e. Appropriate management of working hours and consideration for living wages
  - f. Respect for freedom of association and collective bargaining
3. Consideration of the environment
4. Promotion of communication with stakeholders through information disclosure
5. Social contribution and coexistence/co-prosperity with local communities
6. Application throughout the supply chain

In the “[SHI Group Basic Policy on Conflict Minerals Mined in the Democratic Republic of the Congo and Adjoining Countries](#)”, Sumitomo Heavy Industries clearly states, “In order to fulfill our social responsibilities, we do not participate in the procurement of conflict minerals” since “anti-government armed organizations use forced labor to mine tin, tungsten, tantalum, and gold”.

In February 2023, Sumitomo Heavy Industries formulated the [Human Rights Policy for the Sumitomo Heavy Industries Group](#). in which it declares in its Basic Concept that “We promise to remain sincere in our approach to all our stakeholders and engage in the strongest possible efforts in our initiatives related to human rights.” Under the policy, Sumitomo Heavy Industries states “We will not tolerate human trafficking; forced labor through violence, threats, or debts; child labor; or modern slavery.”

Within this same [policy](#), Sumitomo Heavy Industries also supports and conforms with international standards including “the UN's "International Bill of Human Rights", and "Guiding Principles on Business and Human Rights", the ILO's "Declaration on Fundamental Principles and Rights at Work" and "OECD Guidelines for Multinational Enterprises".” They also specifically state “We will seek to understand and evaluate risks related to human rights, establishing with third party organizations, and implementing on an ongoing basis a series of mechanisms for verifying and improving upon the effects of our efforts”.

In their [2023 Integrated Report](#), Sumitomo Heavy Industries stated that for their working environment survey of foreign technical intern trainees, “We did not identify any current or imminent human rights issues related to human rights violations, safety, or human health.”

At LBX Company, LLC, we have an established Code of Ethics and Business Conduct Guidelines. Within these Guidelines, it states, “Be honest and ethical in every action you take” and “Follow the law. If you are ever unclear about a law or regulation, ask a member of management” and “Stay alert. Pay close attention to any activity that is inconsistent with our Code, Company policy, or applicable law.” The Guidelines further state “As an employee of LBX, you are obligated to conduct the business affairs of the Company in keeping with the highest legal and ethical standards.” We also address managers and

supervisors directly by providing direction to “Promote a culture of integrity by making ethical decisions and showing honesty and integrity in everything you say and do. Never encourage or direct any employee to violate the Code, Company policy, or the law.”

In 2023, other than as disclosed above, the company did not take any such steps to prevent and reduce the risk that no forced labor or child labor is used at any step of the production of goods or elsewhere by the entity. In addition, LBX did not initiate any forms of due diligence.

In 2024, LBX Company LLC. will begin identifying and establishing training and processes to address forced labor and child labor within our supply chain.

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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 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.

This report was approved by the Board of Directors of LBX Company, LLC on September 18, 2024.

Eric Sauvage  
President & CEO  
LBX Company, LLC  
September 30, 2024



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I have the authority to bind LBX Company, LLC.