



Reporting requirements for the *Fighting Against  
Forced Labour and Child Labour in Supply Chains Act*  
(*Bill S-211*)

Report for Year Ending: December 31, 2023

## Company Information

LED Roadway Lighting (LRL) is a corporate entity headquartered in Halifax, Nova Scotia, Canada, with a manufacturing facility in Amherst, Nova Scotia.

LRL is a developer of LED-based street lighting products, smart lighting controls and connected smart city technology applications that create safe, efficient, livable cities which the company markets under the Liveable Cities brand.

LRL's smart city IoT products leverage the street light location to deploy advanced speed, air quality, traffic, and noise sensors, revealing actionable insights for communities around the world as they work towards creating the smart cities of the future.

## Report Version and Changes

This 2023 report is the first time LRL is compiling a report to meet requirements outlined in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)*

## Reporting Requirements

LRL produces goods through manufacturing within Canada, selling goods both in Canada and throughout the world, and LRL imports goods into Canada that are produced outside Canada.

To accomplish these activities LRL does buy components from a variety of vendors in the electronics industry, but also has two major supply chains situated within different countries in Asia.

LRL has taken steps to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods.

- Within the Master Supply Agreement (MSA), LRL includes a Code of Conduct that has a number of requirements for: Legal Compliance, Prohibition of corruption and bribery, Respect for basic human rights of employees, Prohibition of child labour, Health and Safety of Employees, Environmental Protections, and applying this Code of Conduct amongst its supply chains.

- The basic human rights section covers forced labour concerns, and the prohibition of child labour covers child labour concerns.
  - APPENDIX A contains a copy of our Code of Conduct for Suppliers within a Master Supply Agreement.
- In 2022, LRL updated the questionnaire that we ask of our major suppliers to ask them if they have a policy to identify and prohibit the use of forced labour and/or child labour in their activities and supply chains (and provide a copy if they do).
  - LRL conducts annual in-person audits of its major supply chain partners to ensure adherence to, among other things, compliance with the Company Code of Conduct which includes the prohibition of child and forced labour.
  - When qualifying any new supply chain / major supplier, LRL has completed an on-site visit and completed various auditing activities which has given LRL the ability to meet, inspect and review all requirements with new supply chain partners.

LRL does have policies and due diligence processes in place related to forced labour and/or child labour. LRL embeds responsible business conduct into policies and management systems through the Code of Ethics and Business Conduct section of the Employee Handbook.

Orientation training is mandatory, and employees are made aware of the policies and procedures in the Employee Handbook at the time of onboarding. Furthermore, employees are reminded that they are required to review the Employee Handbook annually.

LRL has not started a process to identify, access or manage risks from its activities and supply chains regarding forced labour or child labour being used in any related sector or industry.

LRL has not identified any forced labour or child labour in our activities and supply chains, thus have not had to take any measures to remediate because we have not identified any violations.

LRL does not currently assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

Board of Directors Attestation

*In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (herein referred to as the "Act"), and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for LED Roadway Lighting Ltd. 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 2023 reporting year.*

Name: Bill Karsten

Title: Chair of the Board

Date: May 31, 2024

Signature Bill Karsten

" I have the authority to bind LED Roadway Lighting"

## **Code of Conduct for LRL Suppliers**

This Code of Conduct defines the basic requirements placed on suppliers of goods and services to LRL concerning their responsibilities when doing business with LRL. LRL reserves the right to reasonably change the requirements of this Code of Conduct due to changes of LRL's compliance program. In such event, LRL expects the Supplier to accept such changes.

### **The Supplier declares herewith:**

- **Legal compliance**
  - to comply with the laws of the applicable legal system(s).
- **Prohibition of corruption and bribery**
  - to tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.
- **Respect for the basic human rights of employees**
  - to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, gender or age;
  - to respect the personal dignity, privacy and rights of each individual;
  - to refuse to employ or make anyone work against his will;
  - to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
  - to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
  - to provide fair remuneration and to guarantee the applicable statutory minimum wage;
  - to comply with the maximum number of working hours laid down in the applicable laws;
  - to recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.

- **Prohibition of child labor**
  - to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.
- **Health and Safety of employees**
  - to take responsibility for the health and safety of its employees;
  - to control hazards and take all possible precautionary measures against accidents and occupational diseases;
  - to provide training and ensure that employees are educated in health and safety issues;
  - to set up or use an occupational health & safety management system according to OHSAS 18001 or its equivalent.
- **Environmental protection**
  - to act in accordance with the applicable local law and international standards regarding environmental protection;
  - to minimize environmental pollution and make continuous improvements in environmental protection;
  - to set up or use an environmental management system according to ISO 14001 or equivalent.
- **Supply Chain**
  - to use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;
  - to comply with the principles of non-discrimination with regard to supplier selection and treatment.