



MDT Sporting Goods
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Bill S-211 Report

An Act to enact the fighting against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Forced Labor and Child Labor Statement for the Financial Year Ended 2023

MDT Sporting Goods Ltd., a corporation incorporated under the laws of British Columbia, and the entities it controls (the “Company”), is committed to respecting human rights and conducting all aspects of its operations in compliance with the highest legal and ethical standards, and expect all Company employees and other persons acting on its behalf to uphold this commitment. In furtherance of this commitment, this statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. It outlines MDT Sporting Goods Ltd.'s approach and initiatives to identify and address the risks of forced labor and child labor in its business operations and supply chains during the financial year commencing 01/01/2023 and ending 31/12/2023.

1. GROUP STRUCTURE

MDT Sporting Goods was established in 2009. It trades under the business name MDT Sporting Goods Ltd. (Business Number 765760707), and its head office is located in British Columbia, Canada. The Company designs, manufactures, and sells chassis systems, magazines, buttstocks, and other rifle accessories used for target shooting and hunting purposes in Canada (the “Products”) and exports them primarily to the United States and the global market.

MDT Sporting Goods Ltd. is a privately owned corporation, incorporated under the laws of British Columbia, comprising a board of directors, and represented by its CEO. The company fully owns another entity in Canada as well as one entity in the United States. It employs two hundred and twenty-two (222) employees in Canada and fourteen (14) employees in the USA.

MDT Sporting Goods headquarters in British Columbia, Canada, regroup the senior management team, comprising the CEO, CFO, COO, and VP of Sales& Marketing, the management team, and the Engineering, Sales, Marketing, Operations, Customer Support, and Finance teams.

MDT Sporting Goods also fully controls the following entities:

MDT Sporting Goods in Idaho, USA, operates under the legal name MDT Sporting Goods Inc. (FEIN 46-3747912). This entity comprises a management team, and an Operations team.

MDT Manufacturing in British Columbia, Canada, operates as two divisions (Harmonic and Radical) under the legal name Harmonic Machine Inc. (Business Number 869252213). These divisions comprise a management team, and Engineering, Operations, and Finance teams.

2. SUPPLY CHAIN

MDT Sporting Goods’ Supply Chain consists of a few different procurement channels. First, the procurement of raw materials such as aluminum and steel alloys for its CNC machining activities as well as polymers for its Injection molding activities. Secondly, the procurement of third party services such as surface treatments to apply different types of finish to its products. And lastly the procurement of components to assemble its products into finished goods

Close to 95% of the materials, services and components in the Company’s Supply Chain are sourced in North America. Throughout its Supply Chain MDT Sporting Goods strives to work with trusted suppliers and service providers who share the same commitment to

respecting human rights and conducting all aspects of their operations in compliance with the highest legal and ethical standards.

For the MDT Sporting Goods headquarters in British Columbia, Canada, the Company procures the components and third-party services required to assemble its products, warehoused on-site. These components and services are sourced from a hundred and eighty-one (181) suppliers located mainly in North America (93% in Canada and the USA) but also from Asia (7% in China, India, and Singapore).

A minority of products warehoused at this location are imported from MDT Sporting Goods Inc. in Idaho, USA.

For its MDT Manufacturing HARMONIC division, the Company procures the materials, CNC machinery, tools and consumables it requires to machine the components designed by MDT Sporting Goods. These materials, CNC machinery, tools and consumables are sourced from 27 suppliers located mainly in North America (93% in Canada and the USA) but also from Asia (7% in China)

For its MDT Manufacturing RADICAL division, the Company procures the materials, machinery, tools, and consumables it requires to manufacture injection-molded polymer components and assemblies designed by MDT Sporting Goods. These materials, machinery, tools, and consumables are sourced from twenty-four (24) suppliers located mainly in North America (96% in Canada and the USA) but also in Asia (4% in China).

For the MDT Sporting Goods Inc facility in Idaho, USA, the Company procures the components and third-party services required to assemble its products, warehoused on-site. These components and services are sourced from 137 suppliers located mainly in North America (99% in the USA) but also from Asia (1% in China).

A majority of the products warehoused at this location are imported from MDT Sporting Goods' headquarters in British Columbia, Canada.

At any of these locations, MDT Sporting Goods provides opportunities for youth and students to be employed in a variety of positions as a means to help finance their education and discover their potential interests for future careers. This program is strictly conducted in accordance with Canadian and US labor laws.

3. RISKS IN SUPPLY CHAIN

MDT Sporting Goods is committed to respecting human rights and ensuring that forced labour and child labour is not part of any product within its supply chain. The Company recognizes that, due to the sector of activity it operates in (Manufacturing) and due to the use of raw materials it procures (Metallic Alloys and Polymers) for the manufacture of its

products, the potential for risks of forced labour and child labour cannot be ignored. That is the reason why the Company, and the entities it controls, engage exclusively in business with supply chain partners who are known and recognized in their own sector of activity and who uphold a high level of commitment in the fight against forced labour and child labour.

4. ACTIONS TAKEN

While no specific actions or steps have been taken during this reporting period, MDT Sporting Goods is committed to take noticeable actions in the time period leading up to the next reporting deadline in May of 2025. The Company's will focus particularly on documenting its actions in the following areas:

- Mapping activities
- Mapping supply chains
- Conduct internal risk assessment
- Developing and Implementing due diligence policies and processes
- Developing and Implementing training and awareness

5. RISKS ASSESSMENT

While no specific risk assessment, whether internal or external, have been conducted during this reporting period, MDT Sporting Goods is committed to conduct an internal risk assessment of its supply chain, as part of the actions it will take in the time period leading up to the next reporting deadline in May of 2025.

6. REMEDIATION

While no specific remediation measures have been taken during this reporting period, MDT Sporting Goods is committed to adequately remedy any risks identified as a result of the risk assessment of its supply chain to be conducted in the time period leading up to the next reporting deadline in May of 2025.

7. TRAINING

While no specific employee training and awareness on the fight against forced labour and child labour has taken place during this reporting period, MDT Sporting Goods is committed to raise awareness and train its employees on this matter. The Company will focus on developing and implementing policies and processes and to train its employees on how these apply to the company's daily operation. MDT Sporting Goods commits to have its

employees trained in the time period leading up to the next reporting deadline in May of 2025.

8. EFFECTIVENESS ASSESSMENT

Since there is no information available for this reporting period, as described in points 4 to 7, MDT Sporting Goods is not able to assess the effectiveness in ensuring that forced labour and child labour are not being used in its supply chain.

The Company commits to have an effectiveness assessment conducted in the time period leading up to the next reporting deadline in May of 2025.

9. SIGN OFF

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: Kristopher Neels

Title: COO

Date: May 31, 2024

Signature: *(accompanied by the statement “I have the authority to bind MDT Sporting Goods Ltd.”)*

I have the authority to bind MDT Sporting Goods Ltd.

