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## Introduction

Prepared by Max Fuel Distributors Ltd., (“Max Fuels”) (Business Number: 889992988) in accordance with Section 11 of Bill S-211, this report pertains to the financial year ending on April 30th, 2024. Max Fuels qualifies as an entity under the Act, maintaining operations and meeting prescribed thresholds for revenue, assets, and import and distribution activities within Canada.

At Max Fuel Distributors Ltd., we uphold our values of safety, dedication, integrity and service in our day-to-day operations, and maintain a strong commitment to providing high quality products and services to our customers.

Although we have not historically found any risks of forced or child labour within our operations and supply chain, we acknowledge the critical need to eliminate child labour and forced labour globally. In accordance with Section 11 of Bill S-211, this report outlines the initiatives we have undertaken to identify potential risks of forced and child labour, as well as the measures we plan to implement to prevent such issues in the future.

## Section A: Legal and Organizational Structure

Max Fuel Distributors Ltd. is an approved fuel and lubricants distributor for Petro-Canada based in Slave Lake, Alberta. We primarily source products from Canada and distribute exclusively in Canada.

Over 99% our supply chain comes from suppliers in Canada and only a small portion of our supply chain (less than 1%), including trucks and parts from Stahl Peterbilt, come from the United States.

## Section B: Policies and Due Diligence Processes

To date, we have not encountered any risks of child labour or forced labour within our operations or supply chains. We source the vast majority of our supply chain from suppliers in Canada, with only a small portion of our purchases coming from suppliers in the United States. Consequently, we believe the risk of modern forced or child

labour in our activities and supply chain is very low. As a result, we have not formally implemented any policies or due diligence processes to mitigate child labour and forced labour in the past fiscal year. Nonetheless, we place great importance on operating responsibly and ethically and will adapt our policies and due diligence processes if our risk profile changes in the future.

### **Section C: Forced Labour and Child Labour Risks**

In the previous fiscal year, a risk assessment was not conducted. However, we have recently launched a process to identify potential risks related to forced or child labour within our supply chain. This initiative draws upon insights from various sources including the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour. Through our analysis, we have identified potential risk factors associated with specific goods and countries.

It is crucial to emphasize that the identification of these risks does not imply the actual presence of forced or child labour within our supply chain. Rather, our aim is to proactively recognize and address potential scenarios where such risks might arise, enabling us to implement preventive measures. We recognize that no industry is entirely immune from the risks of forced and child labour and we are committed to acting responsibly within our supply chain.

Our risk assessment strategy involved a geographic analysis based on the Walk Free Global Slavery Index to identify regions at higher risk of forced and child Labour practices. This geographical focus was complemented by an evaluation of product categories vulnerable to such risks, facilitating a more targeted and informed approach to risk management.

Canada, where almost all our products originate from, demonstrates a low prevalence of forced or child labour and has low population engaged in forced or child labour based on the Walk Free Global Slavery Index. We also did not identify any product risks based on the US Department of Labour List of Goods Produced by Child Labour or Forced Labour.

As a result, we believe that the risk of forced and child labour in our activities and supply chains is very low.

### **Section D: Remediation Measures**

We have not identified any instances of forced labour or child labour within, or prior to, our last full financial year, so no remediation measures have been necessary to date. However, if we detect any signs of forced or child labour in our future business dealings, we are committed to taking appropriate and timely remediation measures.

### **Section E: Remediation of Loss of Income**

We have not identified any instances of forced labour or child labour within, or prior to, our last financial year, and thus have not needed to take any remediation measures to date. Should any risks of forced or child labour arise in our future activities and supply chains, we will take appropriate actions to address the loss of income for vulnerable families. We remain dedicated to making a positive impact on our global community.

### **Section F: Training**

In the last financial year, we have not conducted any training on forced labour or child labour. If our risk profile changes in the future, we will update our training requirements for employees accordingly.

### **Section G: Assessing Effectiveness**

Over the last financial year, we have not formally evaluated our effectiveness in preventing forced labour and child labour in our operations and supply chains. We will continue to monitor our risk profile, and if the risk of forced or child labour in our activities and supply chains increases in the future, we will implement and assess appropriate mitigation initiatives and measures.

### **Conclusion**

We prioritize maintaining high standards of ethical conduct and compliance with Bill S-211. Although the risk of child labour and forced labour in our activities and supply chains is very low, we will monitor these risks and ensure transparency. If our risk profile changes in the future, we will adapt our risk mitigation processes accordingly.

**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.

INGO VON WACKERBARTH  
Full name

President  
Title

July 5 - 2024  
Date

  
Signature

I have the authority to bind Max Fuel Distributors Ltd.