

## **Maxi-Metal Inc. Fighting Against Forced Labour and Child Labour in Supply Chains Report (2023)**

### **ABOUT THIS REPORT**

Maxi-Metal Inc. ("MMI", "we", "our" or "us") has prepared this report (the "**Report**") being submitted pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the financial year ended December 31, 2023 (the "**Reporting Period**").

This Report describes the steps taken to enhance transparency in our supply chains by outlining the steps taken during the 2023 financial year to prevent and reduce the risk that forced labour or child labour ("**Modern Slavery**") is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

MMI does not report under similar legislation in any other jurisdiction. However, MMI's parent company, Oshkosh (as defined below) reports under similar legislation in the United States and United Kingdom. Oshkosh's most recent Human Trafficking Compliance Plan for those jurisdictions can be found [here](#).

### **COMPANY STRUCTURE, ACTIVITIES AND SUPPLY CHAIN**

#### ***Company Structure***

MMI is a wholly owned subsidiary of Oshkosh Corporation, a publicly traded company (NYSE: OSK) headquartered in Wisconsin, USA. Oshkosh Corporation ("**Oshkosh**") is an industrial technology company and manufacturer of purpose-built vehicles and equipment for the access, defence, fire & emergency, refuse collection, concrete placement, and aviation group support markets. Oshkosh acquired MMI in June 2022 and MMI was subsequently integrated into Oshkosh's compliance programs. Oshkosh does not carry on business in Canada.

Founded in Quebec in 1983, MMI has been delivering optimized intervention vehicles to utility fleets and fire services with an outstanding reputation for quality and service. MMI continues to be based in Saint-Georges, Quebec and has over 85 skilled and dedicated workers in Canada. These employees are subject to Canadian labour and employment laws and standards. We are especially proud of our extremely low turnover with an average employee age of 45 years and an average seniority of 11 years. This ensures a continuing consolidation of experience acquired with each unit that rolls out our doors.

#### ***Activities***

MMI is a leading North American designer and manufacturer of fire apparatus assembled on custom chassis, designed and manufactured to meet the demanding requirements of firefighters.

#### ***Supply Chains***

As a part of the Oshkosh family, we benefit from Oshkosh's broad supplier base. Oshkosh sources products and components from approximately 4,400 suppliers domestically and internationally, some of which are acquired by its subsidiaries, including MMI. MMI only imports, sells, and distributes Oshkosh products that are related to the MMI business. Accordingly, MMI only

imports, distributes, or sells a subset of all goods or services that were manufactured using inputs sourced from Oshkosh's global supplier base in support of our firetruck manufacturing business.

In 2023, MMI purchased approximately 17,500 products from approximately 350 suppliers based in 2 countries. Of those products, 100% were purchased in Canada and the United States.

## **POLICIES AND DUE DILIGENCE**

Oshkosh takes a global, company-wide approach to its modern slavery compliance, which includes MMI. Oshkosh has a zero-tolerance approach towards any form of modern slavery, human trafficking, forced or involuntary labour and child labour.

The policies and procedures discussed in this report, including the Oshkosh Human Trafficking Compliance Plan, Oshkosh Code of Ethics and Conduct (the "**Code**"), the Human Rights Policy, the Oshkosh Supplier Code of Ethics and Conduct (the "**Supplier Code**"), apply to all entities in the Oshkosh organization, including MMI (the "**Oshkosh Group**"). Accordingly, MMI relies on the supply chain processes used by Oshkosh globally, which assess suppliers.

### Policies

#### *Human Trafficking Compliance Plan*

This document is a practical resource and a compliance plan for applicable human trafficking laws and regulations that affect the Oshkosh Group's business practices.

In this Plan, Oshkosh defines human trafficking as the subjection of persons to exploitative conditions that are tantamount to slavery. Human trafficking occurs when one person obtains or holds another person in compelled service via involuntary servitude, slavery, debt bondage, and/or forced labour. This Plan references the U.S. government's zero-tolerance policy against severe forms of human trafficking. The Oshkosh Group also has a zero-tolerance approach towards human trafficking and expects that all company employees, officers, and directors will comply with applicable human trafficking laws and regulations.

The Oshkosh Group prohibits its employees and all subcontractors and agents from:

- Engaging in human trafficking in persons;
- Procuring commercial sex acts;
- Using forced labour;
- Destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a form and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place;

- Charging employees recruitment fees;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document at least five days before an employee writing in a language the employee understands and contain a detailed description of the terms and conditions of employment.

This Plan explains the Oshkosh Group's efforts related to human trafficking and is published and maintained on the Oshkosh website in compliance with program requirements.

#### *Code of Ethics and Conduct*

The Oshkosh Group's Code contains our people first commitment, which includes respecting and protecting human rights and promoting fair employment practices everywhere we do business. The Oshkosh Group believes every individual is free to choose whether or not to work. The Oshkosh Group prohibits child labour, forced labour, slavery and human trafficking.

We also believe every individual has the right to a fair wage, safe and healthy working conditions and the freedom to exercise their legal rights of free association and collective bargaining.

We expect nothing less from suppliers and business partners. The Oshkosh Group strives to work only with those who share its commitment to advance the human rights of all people. Oshkosh looks to those in its supply chain to source responsibly, by performing due diligence in selecting their suppliers.

#### *Human Rights Policy*

The Oshkosh Group prohibits any action which in any way disregards international labour and human rights or violates any applicable law or regulation. The Oshkosh Group strictly prohibits the use of child labour and any form of forced or involuntary labour including prison labour, indentured labour, bonded labour, modern forms of slavery or any other form of human trafficking as defined by the International Labour Organization.

The Oshkosh Group believes in compensating team members competitively based on the relative local labour market and in accordance with any applicable collective bargaining agreements. It will meet all employment and other compensatory laws and regulations where it operates and follows all applicable laws related to minimum wage, work hours, overtime, and benefits.

While this policy represents the Oshkosh Group's own standard regarding human rights, the Oshkosh Group supports the human rights concepts advanced by the International Labour Organization, the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, and strives to uphold these principles.

#### *Supplier Code of Ethics and Conduct*

The Oshkosh Group expect all suppliers, vendors, distributors, consultants, agents, and other third-party providers (collectively, its "**business partners**") to:

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- prohibit any form of modern slavery including child labor, forced labor, and human trafficking;
- ensuring all products are free from conflict minerals; and
- protect the rights of all people to earn a fair wage, work in safe and healthy conditions, and exercise their legal rights of free association and collective bargaining.

Oshkosh's Global Procurement and Supply Chain team supports business partners and expects that they understand and are upholding the expectations outlined in the Supplier Code. This includes but is not limited to monitoring activities, on-site inspection (announced or unannounced) of facilities, reviews of books and records by either Oshkosh team members or third parties chosen by Oshkosh.

If we become aware of a situation where a business partner is not adhering to the expectations set forth in the Supplier Code, we will work with the business partner to correct the issue in a reasonable time frame. If the business partner is unable to correct the issue or refuses to uphold the Supplier Code, the Oshkosh Group reserves the right to terminate the business relationship.

### Due Diligence

To support Oshkosh's commitment to human rights the Oshkosh Group carries out due diligence mechanisms, include those set out below.

#### *Due Diligence Screening*

Oshkosh bases its sourcing decisions on a process that includes objective criteria such as quality, price, service and delivery record. As part of the onboarding process, Oshkosh's Global Ethics & Compliance Team conducts appropriate due diligence for its business partners.

Steps in the diligence process conducted by Oshkosh include:

The due diligence process begins with determining the risk level of the business partner. If there is an elevated level of risk additional steps are taken which include determining ownership, completing restricted parties screening, and reviewing web-based reports through a public source risk intelligence database that screens for human rights accusations, allegations, and charges. Additional mitigation measures are taken if warranted.

#### *Supply Chain Certification*

All of the Oshkosh Group's suppliers are expected to read and comply with the principles in the Code and Supplier Code as a condition of doing business with the company. The Supplier Code clearly outlines the expectations that we have for our suppliers, and the business partner's supply chain partners, including prohibiting the use of any form of forced or involuntary labour, child labour, or any other form of human trafficking. Any violation will result in action up to and including the termination of contracts.

#### *Risk Assessment*

The Oshkosh Group partners with FRDM, a company that uses AI-based monitoring, to provide better transparency and assessment capabilities in the Oshkosh Group supply chain. Oshkosh Group leverages this supply-chain mapping technology to identify and mitigate potential human

rights issues deep into its supply chain, using a risk-based approach that focuses on supply chain connections and affiliations and the genomes of purchased products. This approach allows Oshkosh to identify and subsequently address the areas where the business and/or supply chains may be vulnerable to slavery and human trafficking.

#### *Monitoring, Auditing, and Verification*

The Oshkosh Group's purchasing organization is responsible for supporting and evaluating suppliers and may engage in monitoring activities to assess compliance with the Supplier Code including onsite inspection of facilities. The Oshkosh Group reserves the right to carry out unannounced inspections of suppliers either by internal Oshkosh Group staff or by a third party chosen by the Oshkosh Group. In addition, any conduct that violates the expectations outlined in the Supplier Code or other behavior that is not in accordance with applicable laws and regulations can be reported by anyone through the Ethics Helpline. The Ethics Helpline is available via telephone or online at [www.tnwinc.com/reportline/Oshkosh](http://www.tnwinc.com/reportline/Oshkosh).

### **POTENTIAL RISKS OF FORCED LABOUR OR CHILD LABOUR IN OUR OPERATIONS AND SUPPLY CHAINS**

#### ***Potential Risks in Our Operations***

We consider the risk of Modern Slavery occurring within our operations to be low considering the limited products that MMI imports from outside of Canada, in addition to our entirely Canadian workforce and in-depth policies and procedures that govern our day-to-day operations and employment relationships.

From a geographical risk perspective, our employees are limited to Canada, which has a low prevalence of child and forced labour, low risk of vulnerability to child and forced labour, and fairly robust governmental responses addressing child and forced labour.<sup>1</sup>

At a company-wide level, Oshkosh strictly prohibits the use of child labour and any form of forced or involuntary labour including prison labour, indentured labour, bonded labour, modern forms of slavery or any other form of human trafficking as defined by the International Labour Organization.

#### ***Potential Risks in Our Supply Chain***

As a subsidiary of Oshkosh, our supply chains directly benefit from the policies and due diligence implemented at the parent level and amongst the Oshkosh Group that are designed to assess the compliance of their respective supply chains.

We recognize that the risks of Modern Slavery are inherent to all supply chains, including ours. However, we rely on the policies of the Oshkosh Group to identify and reduce these risks.

Through our assessment of MMI, we did not identify any unique risks of Modern Slavery that relate to our operations or supply chains. Rather, the Modern Slavery risks applicable to MMI are more general in nature.

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<sup>1</sup> See Walk Free, Global Slavery Index 2023, available here: <https://www.walkfree.org/global-slavery-index/map>.

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Further, we are not aware of any instances of Modern Slavery in MMI's operations or supply chains. Accordingly, no steps were required to remediate child or forced labour, or the loss of income associated with remediation efforts.

## **TRAINING AND REPORTING CONCERNS**

MMI benefits from the company-wide training provided as part of Oshkosh's broader compliance and communication programs.

Oshkosh has developed and implemented an awareness program to inform all employees about government prohibitions against human trafficking related activities, the activities prohibited, and the actions that will be taken against the employee for violations. Oshkosh employees are trained on:

- The Oshkosh Human Trafficking Compliance Plan and the Code;
- Consequences for violating Oshkosh policies; and
- The violation reporting process.

Oshkosh offers additional training for employees with direct responsibility for supply chain management to increase their awareness of the risks of slavery and human trafficking and ways to mitigate those risks.

Our employees are not expected to always know what to do in every situation. However, employees have a duty to seek help if something is unclear or causes concern and must speak up if they see or suspect conduct that creates the risk of a legal or ethical violation. This can always be done anonymously.

If employees want to report a concern or potential violation, multiple resources are available. Company employees are encouraged to contact:

- A Supervisor/Manager,
- The Human Resources department,
- The Global Ethics & Compliance Group,
- The Legal Department,
- Contacts identified in corporate policies and procedures, or
- The Ethics Helpline (1.866.554.3844 or <https://secure.ethicspoint.com/domain/media/en/gui/55824/index.html>)

The Ethics Helpline also has international country helpline numbers which are available on the Oshkosh intranet site and on the Ethics Helpline website. Additionally, activity inconsistent with this policy prohibiting trafficking in persons can be reported, without fear of retaliation, to the Global Human Trafficking Hotline at 1.844.888.FREE or email [help@befree.org](mailto:help@befree.org).

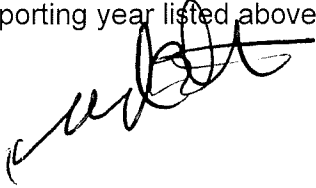
## **ASSESSING EFFECTIVENESS**

As we continue to evaluate MMI's compliance measures that are designed to prevent and reduce the risk of Modern Slavery, we intend to consider, where appropriate, implementing measures to assess the effectiveness of any of our processes.

## BOARD OF DIRECTORS APPROVAL AND ATTESTATION

This Report was Approved by the Board of Directors of Maxi-Metal Inc., pursuant to section 11(4)(a) of the Act.

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.



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I have the authority to bind Maxi-Metal Inc.  
Michael B. Witwer  
Director, Maxi-Metal Inc.  
05 June 2024