

Modern Slavery  
For the Financial Year Ending September 30, 2023

Parent Company:

Motor City Electric Co. – USA #80970 8811 RC0001

Subsidiary Company referred to as “MCE”:

Motor City Electric Utilities – USA # 84494 1914 RC0001

Motor City Electric Technologies – USA # 86351 8189 RC0001

Mid South Contractors ULC – CN #89653 1860 RP0001

Motor City Electric Co. is an ESOP (employee owned) multinational company established in the state of Michigan in 1952. MCE continues to find success in advanced technologies, while constantly expanding the scope of our capabilities. MCE’s broad service base encompasses a wide range of industries served by our various specialized divisions. Each division is committed to the MCE standards of excellence in performance and service that it’s customers have come to expect. MCE’s operations have grown to serve a wide audience of customers and their electrical needs from basic electrical wiring to comprehensive design/build, design/assist and pre-construction management.

At MCE we believe that all individuals deserve respect. As such, we look to create an environment that focuses on compassionate treatment of all. We do not condone child or forced labor or human trafficking in which we operate.

1. Introduction: This policy outlines our commitment to combatting modern slavery and human trafficking. The policy applies to all employees, contractors and suppliers involved in our operations.
2. Definition: Modern slavery refers to situations of exploitation where a person cannot refuse to leave due to threats, violence, coercion, deception, or abuse of power. Types of modern slavery include forced labor, forced marriage and human trafficking.
3. Commitment: We are committed to acting ethically and within integrity in all our business dealings and relationships. We strive to implement and enforce effective systems to prevent, detect and address modern slavery.
4. Responsibilities: It is management’s responsibility to ensure the policy is communicated and understood throughout the organization and by our suppliers. Employees comply with the policies and report any concerns regarding modern slavery to the Human Resources Department. Suppliers should adhere to our standards.
5. Risk Assessment and Due Diligence: MCE will conduct a regular risk assessment of our operations and supply chains.
6. Training and Awareness: MCE is committed to raising awareness about the signs of modern slavery and our policy.

7. Reporting Mechanism: Reports to the Human Resources Department will be taken seriously and investigated promptly.
8. Monitoring: MCE will be review and update the policy to reflect new risks and legal requirements.
9. Response: MCE will take immediate action if modern slavery is identified by working with relevant authorities and support the affected individuals.
10. Communication: MCE will communicate our policy and ensure it is accessible.

By adhering to these guidelines, MCE can create a modern slavery policy that complies with legal requirements and promotes ethical business practices and protects human rights.

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 entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the policy is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Courteney McInerney  
Senior Vice President  
5/23/24

I have the authority to bind Motor City Electric Co. & Subsidiaries.

Title: Modern Slavery Act Report for the Financial Year Ending September 20, 2023 Electrical Contractor Business

1. Introduction:

This report has been prepared to fulfill the reporting requirement of the new Canadian Modern Slavery Act for an electrical contractor business operating both in the United States and Canada. The report aims to provide an overview of the measures taken by the company to identify and mitigate the risks of modern slavery within its operations and supply chains.

2. Company Overview:

Parent Company:

Motor City Electric Co. – USA #80970 8811 RC0001

Subsidiary Company referred to as “MCE”:

Motor City Electric Utilities – USA #84494 1914 RC0001

Motor City Electric Technologies – USA #8635 8189 RC0001

Mid South Contractors ULC – CN #89653 1860 RP0001

Nature of Business: Specialty Electrical Contractor/ Electrical Installation

Geographical Locations of Operations: USA & Canada

3. Modern Slavery Policy:

At MCE we believe that all individuals deserve respect. As such, we look to create an environment that focuses on compassionate treatment of all. We do not condone child or forced labor or human trafficking in which we operate.

MCE has a zero- tolerance for any form of modern slavery. We prohibit our people from engaging in, suggesting, allowing, or ignoring modern slavery, including forced labor, child labor, sexual exploitation, or human trafficking in the conduct of our business. This commitment is implemented through MCE’s Human Rights Policy.

4. Risk Assessment:

MCE has started the process of identifying risks of modern slavery, our assessments are evolving. MCE has identified two key considerations in regards to modern slavery: the scope of services rendered and the foreign location where the services are provided.

MCE's services are less vulnerable to modern slavery given the skill of the professionals providing such services. MCE's electrical installations are completed by IBEW Electricians within the USA and Canada.

The risk assessment concluded that the majority of MCE and Mid South's Canada's suppliers are Canadian companies and therefore considered low risk. We recognize that our suppliers have their own supply chain and our risk assessments and procurement decisions consider the risk where appropriate and possible.

#### 5. Training and Awareness:

MCE trains all employees annually on their responsibility under our code of conduct.

MCE will educate employees, particularly those in procurement and supply chain role on the risks and indicators of modern slavery. The training will cover MCE's modern slavery policy, how to identify and report signs of modern slavery and best practices for engaging with suppliers on this issue.

Starting in 2024, MCE will publish a company wide modern slavery awareness intranet article in order to provide targeted, practical guidance to our employees on this topic.

#### 6. Reporting:

Report any suspected cases of modern slavery, both within the organization and its supply chain to the Human Resources Department.

#### 7. Progress:

Modern slavery due diligence is an ongoing process. MCE will regularly review and update policies, risk assessments and practices to ensure they remain effective. This involves, keeping abreast of new legislation and best practices.

#### 8. Conclusion:

Effective due diligence for modern slavery requires a proactive, comprehensive approach that integrates risk assessment, policy development, supplier engagement, training and transparent reporting. MCE will provide ethical practices within their operations and supply chains.