

## MODERN SLAVERY REPORT for Fiscal Year 2023



Noble Equipment Ltd.

May 28<sup>th</sup>, 2024

This Modern Slavery Report (the "Report") addresses the period from December 1<sup>st</sup>, 2022, to November 30<sup>th</sup>, 2023, and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the "Act").

This Report is made on behalf of Noble Equipment Ltd ("Noble"). Noble does not prepare a modern slavery report to comply with legislation in any other jurisdiction. A French version may be requested from Noble Equipment Ltd. by emailing [info@nobleequipment.ca](mailto:info@nobleequipment.ca).

## **I. INTRODUCTION**

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the agricultural equipment industry, Noble Equipment Ltd. recognizes the important role that we have in ensuring that the supply chains that support our operations and products adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by Noble Equipment Ltd. or of goods imported into Canada by Noble Equipment Ltd.

## **II. OUR BUSINESS**

Noble Equipment Ltd. is an agricultural equipment dealer headquartered in Alberta, Canada. We are a corporation that sells, repairs, supports & distributes agricultural equipment including commercial haying equipment, material handling equipment, and tractors, for example. We also supply parts, attachments, and services to support those products. We operate 3 physical locations in Alberta. As a regular course of business, Noble employs less than 75 employees. Our customers are largely the end-users of our products, which include family farms and agricultural businesses located in Canada. We occasionally supply new & used agricultural equipment and associated products to other distributors in Canada, or to farm operations in the United States. Noble Equipment Ltd. is owned by private partners through their incorporated holding companies.

Noble Equipment's supply chain includes businesses that supply & manufacture agricultural parts and equipment, and supply services to our organization. We mainly receive goods from our suppliers in new, largely complete condition, and complete assembly, testing and final inspection services to the product upon receipt and prior to delivery to the end use customer. Our main manufacturers that we retail equipment for include JCB, Krone, Deutz Fahr, JBS, Penta, Bunning, Arcusin, & Reiter. Most of our direct suppliers are either North American-based or European-based agricultural equipment manufacturers and distributors, who are based in the United Kingdom, Germany, Spain, Italy, Austria, the United States, as well as in the provinces of Ontario, Alberta, Saskatchewan & British Columbia within Canada.

In total, we procure goods and services from approximately 35 suppliers and contractors. Further information about our business can be found on our website.

## **III. OUR POLICIES**

Through our established HR policies & communication methods, we communicate our values and expectations to our employees, setting a high bar for ourselves and for our suppliers, and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations, or in the operations of our suppliers, subcontractors, and other business partners. We make every effort to notify our suppliers of our policies, to prevent our activities having a negative impact on human rights. Our relevant policies are discussed in further detail below:

### **Supplier Code of Conduct**

Noble Equipment Ltd. has recently developed a Supplier Code of Conduct that sets out the expectations we have of our suppliers, their supply chains, and those with whom we do business. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Code of Conduct in their own operations and supply chain and immediately inform us of any concerns.

We also expect our suppliers to share in our commitment to respect human rights and strive to meet the highest ethical business standards and international best practices for responsible business conduct. Our Supplier Code of Conduct sets forth our commitment to preventing and eliminating forced and child labour, and our expectation that suppliers engage in due diligence to identify, address, and resolve risks and instances of forced or child labour in their own operations. We engage with suppliers that are committed to principles of diversity and inclusivity in their supply chains and ask that suppliers commit to these standards as a condition of doing business with us. We plan to review our Supplier Code of Conduct on an annual basis to ensure that this policy is in line with current best practices.

### **Code of Business Conduct and Ethics**

We are committed to conducting our business in a lawful and ethical manner. Our Code of Ethics (the Code) is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Noble Equipment employees should always act lawfully, ethically and in the best interests of Noble Equipment. Each employee is given a copy of Noble Equipment's Code of Ethics upon commencement of their employment and is required to review it and provide written confirmation that they have reviewed the Code. These are reviewed annually to ensure that every employee has signed them.

### **Human Rights Policy**

Noble Equipment does not yet have a Human Rights policy but plans to develop one in the future.

### **Due Diligence**

We expect third parties with which we work to adhere to business principles and values like our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we will take steps to appropriately evaluate the relationship and mitigate any associated risks.

We acknowledge that employees working in our facilities and our supply chain are at potential risk of forced labour or child labour. To mitigate this risk, we follow a due diligence approach that includes the following steps:

- Before committing to a new supplier, we plan to take a variety of steps including some or all of: supplier interviews, supplier visits where practical, reviewing responsible business conduct into policies and management systems, identifying and assessing adverse impacts in operations, supply chains and business relationships, ceasing, preventing or mitigating adverse impacts, tracking implementation and results, communicating how impacts are addressed, providing for or cooperating in remediation when appropriate.

- With individuals directly in our employ, if they are under the age of 18 years of age, we gain written permission from their parent or guardian to commence the employment to ensure that there is full disclosure and understanding of the employment contract, compensation, and work conditions.

#### **IV. ASSESSING OUR RISK**

Noble Equipment Ltd. has not previously engaged in activities to identify, assess, and manage supplier risk. Our intent in the future is to assess the risk of forced and child labour in our business and supply chains, via engaging with our peers, as well as having conversations with our suppliers and Original Equipment Manufacturers, and where possible or practical, travel to their manufacturing facilities to view their working conditions as a form of risk assessment. To identify the business activities with the greatest exposure to these risks, we will consider the following factors:

- Reliance on low skilled workforce
- Dangerous or undesirable work
- Offshore production
- Long, complex, or non-transparent supply chains
- Presence of child labour
- Jurisdictional risks including poverty, conflict, and enforcement of human rights standards.

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as transportation, warehousing, manufacturing, & packaging. As a result, we typically engage with manufacturers and suppliers that are, to the best of our knowledge, reputable in the markets where their products are produced.

#### **V. OUR COMMITMENTS**

##### **Steps to Prevent and Reduce Risks of Forced and Child Labour**

Examples of steps we take to reduce the risks of forced and child labour include:

- We ensure that all workers are recruited voluntarily.
- If we employ a worker under the age of 18 years of age, we gain written permission from their parent or guardian to commence the employment to ensure that there is full disclosure and understanding of the employment contract, compensation, and work conditions. We also ensure that employees are not permitted to work during school hours unless it is a school-approved work time such as a spare. Currently we have 2 employees under the age of 18 years of age.
- We will request that suppliers are aware of our policies and procedures for identifying and prohibiting the use of forced labour and or /minimizing the use of child labour in their activities and supply chains.
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour;

##### **Remediation Measures**

Our Supplier Code of Conduct requires our suppliers to adhere to high standards of ethical conduct. Forced and child labour is strictly prohibited. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labour and child labour is mitigated in our business.

If we discover any forced labour or child labour in our business and supply chains, we will take the following measures to remediate such forced labour or child labour:

- ***Suspension or termination of a supplier, sub-supplier, or contractor.***
- ***Formal apologies, followed by actions to support the victims of forced labour or child labour.***

### **Training**

Noble Equipment Ltd. personnel at all levels are required to complete a mandatory certification process to ensure that our Code of Business Conduct and Ethics is understood and properly applied to our daily activities. Every new employee of Noble Equipment Ltd. must complete mandatory training on our values and policies, including our Code of Business Conduct and Ethics, and are informed of how to report wrongdoing. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

### **VI. OUR PROGRESS AND EFFECTIVENESS**

Given the size & scale of Noble Equipment Ltd., senior management can engage with all employees on a regular basis to informally check in and ensure that these business ethics are understood and implemented. To date no significant concerns or complaints have been identified.

We will also raise awareness of this topic with our key suppliers on a regular basis, ensuring that they are reminded of our commitment. This is to be done at the appropriate times with key supplier meetings, in addition to the distribution of our supplier code of conduct.

### **VII. APPROVAL AND ATTESTATION**

This Report was approved by Noble Equipment's Senior Management Team and Shareholders on May 28<sup>th</sup>, 2024, and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at [www.nobleequipment.ca](http://www.nobleequipment.ca).

In accordance with the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the Noble Equipment Ltd. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Hans van den Bosch

CEO & Majority Owner

May 28<sup>th</sup>, 2024

I have the authority to bind Noble Equipment Ltd.