

Norseman Inc. (Financial Year 2023) Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

Part 1 - The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

Norseman trained all managers and leaders on the *Fighting Against Forced Labour and Child Labour in Supply Chains Act.* Managers and leaders were required to report any risks of forced labour or child labour in any step of the production of goods in Canada or elsewhere and of goods imported into Canada. Managers and leaders were required to assess all Norseman counterparties for the risks of forced labour and child labour. Policies and procedures of counterparties dealing with the risks of forced labour or child labour were requested. Norseman initiated a counterparty prequalification process which includes an assessment of the risks of forced labour.





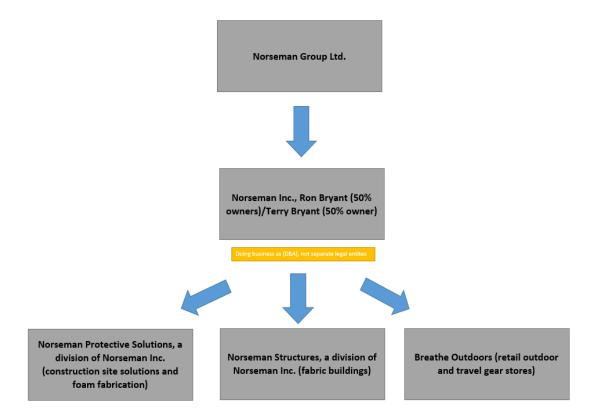
norsemanstructures.com



breatheoutdoors.ca



Part 2 - Its structure, activities and supply chains.



For the production of goods in Canada or elsewhere and goods imported into Canada, Norseman Protective Solutions, a division of Norseman Inc. (DBA) – construction site solutions and foam fabrication utilizes the following sources:

Fabric – Fujian, China; Fontana, CA; Yangzhou City, Jiangsu, China; Ganzhou, Jiangxi, China; Coshocton, OH; Bolton, ON; Linshu County, Shandong, China; Anjou, QC.

Foam - Brampton, Ontario; KY and MA, USA, UK; Deerfield, Illinois; Calgary, AB; Cape Town, South Africa.

Plastics - Sherman, TX; Torrance, CA; Sarasota, Florida; Markham, ON

Steel - Calgary, AB



Packaging - Lake Forest, Illinois; Memphis, Tennessee

For the production of goods in Canada or elsewhere and goods imported into Canada, **Norseman Structures, a division of Norseman Inc. (DBA) – fabric buildings** utilizes the following sources:

Doors and Windows - Calgary, Alberta; Fort McMurray, Alberta

Fabrication - Saskatoon, Saskatchewan; Calgary, Alberta

Freight - Saskatoon, Saskatchewan; Calgary, Alberta

Galvanizing – Saskatoon, Saskatchewan; Winnipeg, Manitoba; Calgary, Alberta

Hardware – Winnipeg, Manitoba; Kurashiki, Okayama, Japan; Sarasota, Florida; Deerfield Beach, Florida; Calgary, Alberta

Inspection Services - Calgary, Alberta; Surrey, British Columbia

Lumber - Calgary, Alberta; Edmonton, Alberta

Mechanical/Electrical - Calgary, Alberta; Edmonton, Alberta

Rig Mats - Edmonton, Alberta

Steel – Harvey, Illinois; Chicago, Illinois; Norcross, Georgia; Salem, Oregon; Calgary, Alberta

Welding – Mississauga, Ontario; Saskatoon, Saskatchewan

For the production of goods in Canada or elsewhere and goods imported into Canada, **Breathe Outdoors, a division of Norseman Inc. (DBA) – retail outdoor and travel gear** utilizes the following sources:

Equipment – Edmonton, Alberta; Dover, New Hampshire; Cortez, Colorado; Seattle, Washington; Austin, Texas; Torrance, California; London, Ontario.



Footwear – Portland, Oregon; Bozeman, Montana; Rockford, Michigan; Annecy, France.

Apparel – Ventura, California; Salt Lake City, Utah; Portland, Oregon; Denver, Colorado.



Part 3 - Its policies and due diligence processes in relation to forced labour and child labour.

See Appendix "A" – Norseman Inc. - Modern Slavery Policy

Norseman initiated a counterparty prequalification process which includes an assessment of the risks of forced labour and child labour.



Part 4 - The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.

Norseman identified the location of certain counterparties as a risk of forced labour and child labour.

Norseman requested the policies and procedures of such counterparties dealing with the risks of forced labour or child labour. Norseman initiated a counterparty prequalification process which includes an assessment of the risks of forced labour and child labour.

Part 5 - Any measures taken to remediate any forced labour or child labour.

Norseman requested the policies and procedures of certain counterparties dealing with the risks of forced labour or child labour. Norseman initiated a counterparty prequalification process which includes an assessment of the risks of forced labour and child labour.

Part 6 - Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

Not applicable.

Part 7 - The training provided to employees on forced labour and child labour.

Norseman trained all managers and leaders on the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. The managers and leaders who were trained we instructed to train their departments to monitor for any risks of forced labour or child labour.





Part 8 - How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

Audits are conducted periodically at the work sites and the offices of Norseman to ensure compliance with Norseman's Modern Slavery Policy. The audits may be conducted internally by Norseman, or externally by retained third parties.

This report has been approved by the governing body of Norseman Inc.

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Ron Bryant President and Chief Executive Officer





Appendix "A" attached to and forming part of the Norseman Inc. (Financial Year, 2023) - Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act



Modern Slavery

OVERVIEW

Norseman is committed to integrity and ethical business conduct.

This Policy applies to Norseman Inc. and its subsidiaries and divisions (collectively "Norseman"). Norseman Personnel (including members of the board of directors, officers, employees and independent contractors) must comply with this Policy.

Norseman Personnel shall comply with Canada's *Fighting against Forced Labour and Child Labour in Supply Chains Act* and the *Criminal Code of Canada*, as well as any other such laws, rules and regulations governing forced labor and child labor in any of the locations in which Norseman operates.

Norseman will take appropriate corrective action to enforce compliance with this Policy. This may include disciplinary action, including termination of employment, cancellation of contracts and where there is violation of applicable laws, the reporting of non-compliances to the appropriate authorities.

RESPONSIBILITY

Norseman's Chief Financial Officer maintains responsibility for administration of and compliance with this Policy. Norseman Personnel are responsible for making Norseman's Chief Financial Officer aware of any potential violation of this Policy.

DEFINITIONS

For purpose of this Policy, the following definitions apply:

Forced Labor: means labour or service provided or offered to be provided by a person under circumstances that:

- (a) could reasonably be expected to cause the person to believe that their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- (b) all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.

<u>Child Labor:</u> means labor or services provided or offered to be provided by persons under the age of 18 years and that:

- (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work;
- (d) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;

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- (e) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- (f) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; or
- (g) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

GUIDELINES

1. General

Norseman Personnel shall monitor and assess Norseman's business for the risk of Forced Labor and Child Labor, which may, for example, be based on factors such as the general sectors, industries, types of products and countries that are involved. Norseman Personnel shall report any risk of Forced Labor or Child Labor.

2. Reporting

Norseman Personnel shall report, on an annual basis, to Norseman's Chief Financial Officer, the following information in order for Norseman to meet reporting obligations under the *Fighting against Forced Labour and Child Labour in Supply Chains Act*:

- (a) Any areas of Norseman's business and supply chain where there may be a risk of Forced Labor or Child Labor,
- (b) Supplier/subcontractor due diligence, and
- (c) Supply chain mapping.

Audit

Audits may be conducted periodically at the work sites and the offices of Norseman to ensure compliance with this Policy. The audits may be conducted internally by Norseman, or externally by retained third parties.

Non-Compliance

- 1. Norseman Personnel who violate this Policy shall be subject to disciplinary action.
- 2. Norseman Personnel who become aware of a potential violation of this Policy must promptly report the matter to Norseman's Chief Financial Officer.
- 3. Norseman Personnel who mislead or hinder any investigation of potential violations of this Policy shall be subject to disciplinary action.
- 4. Retaliation against or discipline of anyone making a good faith report of a potential violation of this Policy is strictly prohibited and will result in disciplinary action.

Disciplinary action may include termination of employment, cancellation of contracts and where there is violation of applicable laws, the reporting of such non-compliances to the appropriate authorities.

References

Fighting against Forced Labour and Child Labour in Supply Chains Act Canada's Criminal Code Act ("CCA") Criminal Code of Canada

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Attachment(s) n/a

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