

# **OREGON TOOL**

**Fighting Against Forced Labour  
and Child Labour in Supply Chains Act S-211**

## **2023 REPORTING**

**(Jan1-Dec 31<sup>st</sup>)**

**Prepared by Aleksandar Ljubicic & Andrew Campagnoni**

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**Annual Report****Legal Name**

Oregon Tool Holdings Ltd., Oregon Tool Distribution Ltd., and Oregon Tool Canada Ltd.

**Financial Reporting Period**

Jan 1 – Dec 31st, 2023.

**Business Numbers**

Oregon Tool Holdings Ltd. 10399 1451

Oregon Tool Distribution Ltd. 13673 4589

Oregon Tool Canada Ltd. 10399 1428

**Joint Report**

Oregon Tool Holdings Ltd., Oregon Tool Distribution Ltd., and Oregon Tool Canada Ltd., located at 505 Edinburgh Rd N, Guelph, ON, N1H 6L4.

**Reporting obligation in other jurisdictions**

None

**Entity Categorization**

Producing goods (including manufacturing and processing) in Canada. Selling goods in Canada and outside Canada. Distributing goods in Canada outside Canada. Importing into Canada goods produced outside Canada.

**Sector / Industry**

Agriculture and forestry, and manufacturing

**Location**

505 Edinburgh Rd N, Guelph, ON, N1H 6L4, Canada

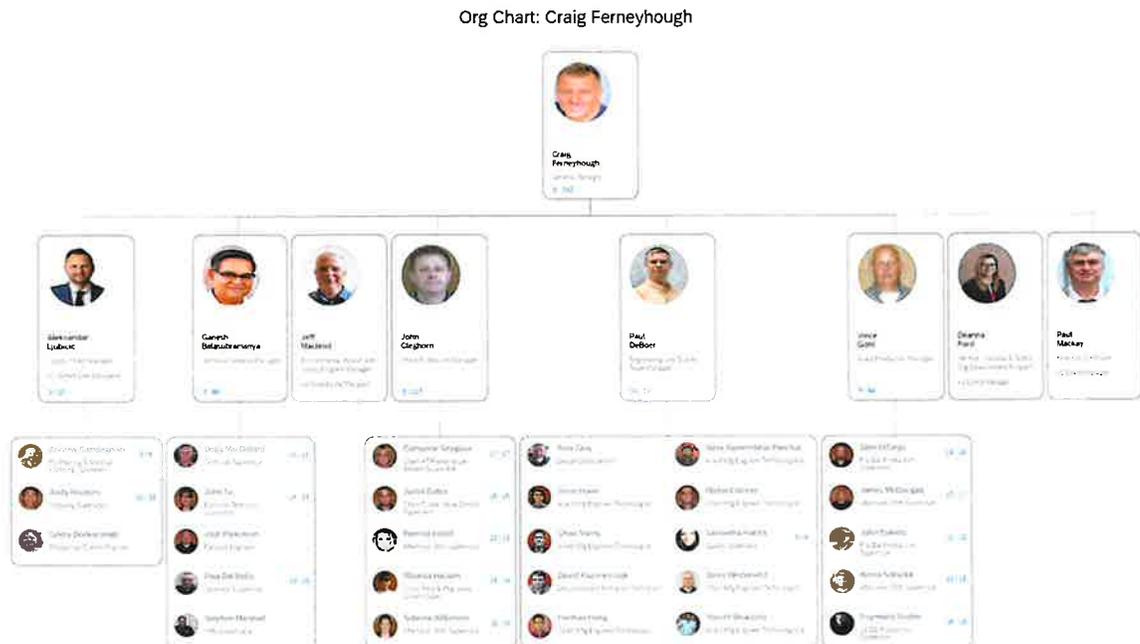
**A description of the steps taken to prevent and reduce risks of forced labour and child labour, as per subsection 11(1).**

No additional steps taken during the 2023 financial reporting period for below items.

**Supplementary information addressing each of the seven requirements in subsection 11(3).**

**a) Its structure, activities, and supply chains**

Oregon Tool Holdings Ltd., Oregon Tool Distribution Ltd., and Oregon Canada Ltd) is a corporation located at 505 Edinburgh Rd N, Guelph, Ontario, N1H 6L4, a company that manufactures saw chains and bars for the forestry, agriculture, and construction industries. Oregon Tool Holdings Ltd. has at least 20 million in assets, generates at least 40 million in revenue and has 342 employees. Refer to the below organizational chart.



Oregon Tool supply chain includes suppliers of goods and services that contribute to the production of goods produced, sold, distributed, or imported by the entity, from sourcing the raw materials to the final product.

Direct suppliers and service providers are located both in Canada and outside of Canada. Suppliers outside of Canada, to the best of our knowledge, are geographically located in USA, Germany, and China.

Indirect suppliers and service providers, both in Canada and outside Canada. Suppliers outside of Canada, to the best of our knowledge, are geographically located in USA & China.

**b) Its policies and its due diligence processes in relation to forced labour and child labour.**

**Oregon Tool code of conduct policy, page 8, states.**

VIII. Human Rights & Fair Labor

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Practices such as child labor or forced labor as well as other acts that deceive or deny workers access to identity documents such as passports or visas are prohibited. We ask and whenever possible contractually obligate our suppliers, direct contractors, etc., to demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

**Oregon Tool Supplier code of conduct policy, page 3, states.**

9. Human Rights & Fair Labor

Suppliers are expected to follow all workplace standards, including health and safety, environmental, and labor standards. This commitment established and ensures a safe working environment for all employees. At Oregon Tool, we are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Practices such as child labor or forced labor as well as other acts that deceive or deny workers access to identity documents such as passports or visas are prohibited. We ask and whenever possible contractually obligate our suppliers, direct contractors, etc., to demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

**c) 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.**

No additional steps taken during the 2023 financial reporting period to prevent, or reduce risks of forced labour and child labour, as per subsection 11(1). However, actions and reporting requirements for 2024 are currently in process (current state assessment, future state, strategy & road map).

**d) Any measures taken to remediate any forced labour or child labour.**

No additional steps taken during the 2023 financial reporting period to prevent, or reduce risks of forced labour and child labour, as per subsection 11(1). However, actions and reporting requirements for 2024 are currently in process (current state assessment, future state, strategy & road map).

**e) 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.**

No additional steps taken during the 2023 financial reporting period to prevent, or reduce risks of forced labour and child labour, as per subsection 11(1). However, actions and reporting requirements for 2024 are currently in process (current state assessment, future state, strategy & road map).

**f) The training provided to employees on forced labour and child labour.**

No additional steps taken during the 2023 financial reporting period to prevent, or reduce risks of forced labour and child labour, as per subsection 11(1). However, actions and reporting requirements for 2024 are currently in process (current state assessment, future state, strategy & road map).

**g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.**

No additional steps taken during the 2023 financial reporting period to prevent, or reduce risks of forced labour and child labour, as per subsection 11(1). However, actions and reporting requirements for 2024 are currently in process (current state assessment, future state, strategy & road map).

## 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.

**Full name:** Craig Ferneyhough

**Title:** General Manager

I have the authority to bind Oregon Tool Holdings Ltd., Oregon Tool Distribution Ltd., and Oregon Tool Canada Ltd., located at 505 Edinburgh Rd N, Guelph, ON, N1H 6L4.

**Signature:** 

**Date:** 