

Introduction

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains and to amend the Customs Tariff Act. This statement outlines the approach and initiatives taken by R.W. Tomlinson Ltd.to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing November 1, 2022 and ending October 31, 2023. This is a joint report on behalf of R.W. Tomlinson Ltd., Tomlinson Environmental Services, and 2839034 Ontario Inc., operating as Material Supply and Logistics (collectively "The Tomlinson Group").

Commitment

The Tomlinson Group is committed to respecting human rights and ensuring that forced labour and child labour is not a part of the products within its supply chain.

Structures, Activities and Supply Chains

R.W. Tomlinson Ltd. is the parent company of Tomlinson Environmental Services Limited and 2839034 Ontario Inc., operating as Material Supply and Logistics. A diagram of the Tomlinson's Group structure is provided below.

R. W. TOMLINSON LTD.

ESTABLISHED 1952, INCORPORATED 1969
BN#894238963
HEAD OFFICE LOCATION:
100 CITIGATE DRIVE, OTTAWA ON.

TOMLINSON ENVIROMENTAL SERVICES

INCORPORATED 2006 BN # 859876765 HEAD OFFICE LOCATION: 100 CITIGATE DRIVE, OTTAWA ON

2839034 ONTARIO INC OPERATING AS: MATERIAL SUPPLIES AND LOGISTICS

INCORPORATED 2021 BN # 760123141 HEAD OFFICE LOCATION: 100 CITIGATE DRIVE, OTTAWA ON



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R.W. Tomlinson Ltd. was established in 1952 to provide construction services, to produce, to distribute, and to sell construction materials, including but not limited to aggregates, asphalt, and concrete.

Tomlinson Environmental Services Limited was established in 2006 for all services relating to solid waste, industrial waste, emergency response, and portable toilet rentals.

2839034 Ontario Inc., operating as Material Supply and Logistics was established in 2021 for the procurement and distribution of construction materials, supplies and small equipment rentals.

Most of the Tomlinson Group's direct vendors are located in Canada, and the other vendors are located in the United States of America. The Tomlinson Group's supply chain primarily consists of vendors related to the procurement of heavy machinery, machine parts, raw materials and supplies for construction use and fuel. The Tomlinson Group recognizes that these suppliers may have in turn purchased goods originating, remanufactured, or distributed from other countries.

Policies and Due Diligence Procedures

The Tomlinson group's employee handbook contains an overarching principle of treating all employees fairly, with dignity and respect throughout all its business activities. There are policies within that include a minimum age requirement policy for all employees, and for employees whose work requires the operation of a motor vehicle to present a valid driver's license.

Steps Taken in Prior Financial Year

The above policies and due diligence procedures were in place throughout 2023. The Tomlinson Group did not take any other steps specific to forced and child labour prevention in the 2023 fiscal year.

Risk Identification

The Tomlinson Group completed an initial review of the international imports received throughout November 1, 2022 and October 31, 2023. During the period in review, the Tomlinson Group directly imported parts, inventory, capital and rental equipment, all of which were from suppliers located in the US. Of the suppliers who imported from the US to Canada, the country of origin was mostly from the US, with some imports coming from Germany, China, India, and Taiwan.

Based on the countries of origin, a further review of the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour from 2022, China, India, and Taiwan were identified as potential risks of forced labour and child labour.

Based on its review of direct suppliers, The Tomlinson Group's has concluded that there is a low risk of forced labour and/or child labour in the immediate supply chains.

Remediation Actions

The Tomlinson Group has not identified any forced labour or child labour in its activities or supply chains. As such, it has not untaken any remediation measures.

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Remediation of Loss of Income

The Tomlinson Group has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not untaken any remediation measures for loss of income

Training

The Tomlinson Group provides employee training as part of its onboarding process. This includes training with respect to safe, ethical, and legally compliant workplace practices and policies. The Tomlinson Group policies are reinforced on an annual basis. In the 2023 financial reporting year, the Tomlinson Group did not provide training to its employees specific to forced labour or child labour. Moving forward, it will be assessing what related training may be appropriate.

Assessing Effectiveness and Continuous Improvement

The Tomlinson Group does not currently have specific policies and procedures in place to assesses its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, it will be assessing what measures may be appropriate in the future, which it anticipates will include the following:

- 1) An initial review of our top 25 direct vendors is completed by October 31, 2024.
- 2) A review of our supplier engagement process is completed by October 31, 2024.

Sign Off

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending October 31, 2023. It has been issued on behalf of R.W. Tomlinson Ltd., Tomlinson Environmental Services Limited and 2839034 Ontario Inc., operating as Material Supply and Logistics and approved by the Tomlinson Group board of directors.

| SIGNED) | R.W. TOMLINSON LTD. |
|-------------------|--|
| 5 30 2024 Date | Per: Name: Title: |
|) | I have authority to bind R.W. Tomlinson Ltd. |



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| 5/30/2024 Date |))))) | Per Name: Title: |
|-------------------------|-----------|---|
| |) | I have authority to bind Tomlinson Environmental Services Limited |
| SIGNED 5 30 30 34 |))) | 2839034 ONTARIO INC., OPERATING AS MATERIAL SUPPLY AND LOGISTICS |
| Date |) | Name: Title: |
| |) | I have authority to bind 2839034 Ontario Inc., operating as Material Supply and Logistics |



Bill S-211 Forced and Child Labour in Supply Chain Draft Report

References

List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor (dol.gov)