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# FIGHTING MODERN SLAVERY

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2023 Report

MAY 27, 2024

## **1. INTRODUCTION**

Ramudden Global (Canada) Inc. and its subsidiaries (collectively, “Ramudden Canada”, “we”, “us”, or “our”) are committed to supporting and promoting the protection of human rights and stands against forced labour, child labour, human trafficking, and all forms of modern slavery. As a group of companies dedicated to keeping people safe on the roads, we recognize the important role we play in protecting human rights, and we strive to avoid causing or contributing to harmful human rights impacts.

This report is prepared in accordance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on behalf of all operating businesses owned by Ramudden Canada for the 2023 fiscal year, which ended on December 31, 2023. This includes Stinson Equipment Ltd. (o/a Stinson Traffic Solutions), Stinson ITS Inc. (o/a Ramudden Digital), Direct Traffic Management Inc. (o/a Ramudden Services) and OBW Equipment Inc. (o/a Ramudden Rentals). This report covers actions taken by Ramudden Canada during the reporting period to ensure that modern slavery is not taking place in its own operations, as well as in its supply chains.

## **2. RAMUDDEN CANADA STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

### **Structure and Activities**

Ramudden Canada is a privately held corporation under the Canada Business Corporations Act with 320+ employees, revenue of \$80+ million per year and headquartered in Vaughan, Ontario. Ramudden Canada also maintains a presence across several locations in Southern Ontario, including Hamilton, Mississauga, Woodbridge, Bradford, Oshawa and Gormley.

Ramudden Canada was established in 2021 as part of the North American division of Ramudden Global AB, a network of traffic safety companies across 11+ countries providing urban and high-speed traffic management, Intelligent Transportation Systems (ITS) and infrastructure safety products and services. Through our operating businesses, the primary activities of Ramudden Canada include the provision of temporary traffic control services, roadwork safety equipment rentals, barrier wall options, traffic management planning, traffic safety signs and devices manufacturing and cutting-edge digital traffic management technology to municipalities across Canada and the private sector in Ontario, including construction, contracting, and engineering firms.

### **Our Values and Approach to Sustainability**

At Ramudden Canada, we are committed to being a caring force for a safer world for our people, the communities we operate in and future generations. Driven by our mission to “make sure everyone comes home safe and well every day” and our core values: close, driven, and considerate, we maintain the highest standard of ethics in the conduct our business.

In recognition of our responsibility to society and the environment as a member of the local and global community, we align our sustainability programs, initiatives, and objectives to the UN Sustainable Development Goals.

We place sustainability at the forefront of our values and are committed to:

- Caring for the planet by championing environmental stewardship within our operations and through the safety solutions we deliver.
- Creating meaningful positive change and social value for our people, the communities we serve and future generations.
- Collaborating with our clients, supply chain partners and stakeholders to be a driving force for a greener and more inclusive shift in our industry.

As part of a global group of companies, we recognize the impact we have is far wider than our geographical scope of operations. As a result, we strive to embed sustainability principles, including universal human rights, equality, and non-discrimination, into every aspect of our operation to ensure that every person in our direct operations and network of supply chain partners is compensated fairly and treated with respect and dignity.

### **Supply Chains**

Ramudden Canada's spending on goods and services is primarily from suppliers based in Canada, with other suppliers based in countries like the United States, United Kingdom, Sweden, and China. Our suppliers provide a range of goods and services, including reflective sheeting, aluminum sheets, arrow boards, trucks, barriers, attenuators, guide rails, variable message sign boards, traffic sensors, installation and maintenance services, freight and logistics, IT and communications equipment and services, office supplies, promotional merchandise, software, and various electronic components.

## **3. MODERN SLAVERY RISKS IN OUR BUSINESS AND SUPPLY CHAINS**

### **Within Our Business**

We believe that the risk of forced labour or child labour among our workforce is negligible. Our Director of People and Culture, along with our Senior Leadership team, oversee the application of our human resource policies. Our recruiting and compensation processes ensure compliance with provincial and federal Canadian laws, where all our employees are based. Our processes also ensure compliance with collective bargaining agreements established with labour unions that our traffic control services employees have association with.

### **Within Our Supply Chain**

Based on internal assessments, we believe that the risk of forced labour and child labour is low within our direct suppliers. However, we recognize that the potential risk of forced labour or child labour may be higher with our indirect suppliers located further down the supply chain. Identifying the risk for these indirect suppliers, of whom we have little control and visibility over, can be complex, and we continue to make reasonable efforts to understand this.

#### **4. MEASURES TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

In 2023, Ramudden Canada hired an internal Sustainability Advisor, and we initiated a supplier risk assessment for each of our operating businesses, with a focus on suppliers that provide direct input materials or services for the goods and services we produce and/or sell. The top 20 suppliers of each operating business, representing 74% of spend for the group, were assessed, and assigned a low, medium, or high rating. This assessment was based on their country(ies) of operations, with consideration of public reports from human rights observers who have identified the potential for forced labour or child labour risks in the production of goods like electronics, and in the production of raw materials like aluminum. We also considered research published by the US Department of Labor that examines which goods are at risk of being produced by forced labour and child labour.

Out of the vendors assessed, 1% had a medium-risk rating due to the country of operations, and 99% had a low-risk rating.

This assessment informed the development of our Supplier Code of Conduct, which will be deployed in 2024. The Supplier Code of Conduct reflects and frames the values and standards that Ramudden Canada expects suppliers and their subcontractors to comply with when engaged in business with us. Suppliers are expected to have guidelines, policies, and/or practices that are communicated throughout their organization, upheld by all levels of management, and considered and applied to their own supply chain activities, which address the following:

- Respect for Human Rights
- Occupational Health & Safety
- Fair Working Conditions, Diversity, and Ethical Standards
- Ecological Responsibility
- Prohibition of Bribery and Corruption
- Fair and Free Competition
- Prevention of Money Laundering, Terrorist Financing, and Other Criminal Acts
- Compliance with Tax Laws
- Business and Trade Secrets
- Conflicts of Interest
- Data Protection and Information Security
- Sustainable Procurement

#### **5. REMEDIATION MEASURES**

In 2023, we did not identify any incident of forced labour or child labour in our activities or supply chain. As a result, Ramudden Canada does not currently anticipate taking any remedial action, and no loss of income to vulnerable families because of such actions is anticipated.

As we take steps to improve our supplier risk management practices and increase visibility across all levels of our supply chain, if we do identify incidents of forced labour within our activities or supply chains, we will consider the appropriate remediation strategies to implement in compliance with Canadian and international standards.

## **6. POLICIES, TRAINING AND DUE DILIGENCE**

At Ramudden Canada, we are committed to upholding the rights of our employees, customers, vendors, as well as the many workers across our supply chain who support our activities.

In accordance with our Code of Conduct, we believe in working with suppliers that demonstrate high standards of ethical business conduct. When engaging with our suppliers, we take steps to retain them on commercially reasonable terms and conditions and we will not knowingly work with suppliers who operate unethically, unsafely, or who violate the law, compete dishonestly, or implement unfair business practices.

Ramudden Canada does not tolerate incidents of workplace violence, abuse or discrimination perpetrated against or by any employee, vendor, contractor, or any other person at the workplace or while involved in our business activities. Through employee onboarding processes and our employee handbook, which was updated in 2023, our employees receive communication and training on the following policies, which highlight our collective responsibility to respect and protect the fundamental human rights of our employees, our customers, vendors, solicitors, and other members of the public related to our activities:

- Workplace Violence Prevention
- Freedom from Workplace Harassment
- Reporting Violence or Harassment in the Workplace
- Equal Opportunity and Freedom from Discrimination

As part of our efforts to strengthen our governance practices, we developed a formal Sustainability Policy and Social Impact Policy, which outline our commitment to collaborate with our supply chain partners and stakeholders to create meaningful positive change and social value within our operations and procurement activities. Currently, we are developing new Sustainable Procurement, Anti-Slavery and Human Trafficking, and Whistleblowing policies to further guide our employees, particularly those engaged in procurement activities, on due diligence processes to identify and exclude modern slavery risks and encourage timely reporting of any breaches of ethical misconduct, including modern slavery or other violations of human rights within our operations or supply chain. These policies, with accompanying training, are expected to roll out in 2024.

## **7. MEASURING OUR EFFECTIVENESS**

As we deploy our Supplier Code of Conduct, new policies, and training to further integrate human rights considerations into our procurement processes in 2024, we intend to identify key performance indicators to help us assess the effectiveness of the actions we are taking.

## 8. ATTESTATION AND APPROVAL

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors and Executive Management of Ramudden Global (Canada) Inc. for the fiscal year ended December 31, 2023.

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the 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.



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James Delamere  
Chief Executive Officer  
Ramudden Global (Canada) Inc.  
May 27, 2024

*I have the authority to bind  
Ramudden Global (Canada) Inc.*



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Jesús Muñoz  
Chief Commercial Officer and Director  
Ramudden Global (Canada) Inc.  
May 27, 2024

*I have the authority to bind  
Ramudden Global (Canada) Inc.*