

What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used in any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity?

In response to growing global awareness and concern regarding labour practices, the company is committed to upholding the highest standards of ethical conduct in its operations and supply chains. Although formal measures specifically targeting the prevention and reduction of forced labour and child labour had not yet been implemented in the previous reporting year (January 1, 2023 – December 31, 2023), the company recognizes the importance of this issue and has actively taken measures to address forced labour risk in global supply chains after the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* was enacted January 1, 2024.

Which of the following accurately describes the entity's structure?

Sigfusson Northern Ltd. is a limited corporation who employed 1,000 employees during peak production but maintained an average of approximately 700 employees during the specified reporting period. The entity is broken down into 7 departments:

1. Operations;
2. Health, Safety & Environment;
3. Finance;
4. Fleet;
5. Pre-construction / Estimating;
6. Business Development & Corporate Strategy; and
7. People & Culture

Sigfusson Northern Ltd. has 1 chief executive officer, 1 chief financial officer, 3 vice presidents, and 5 directors.

Which of the following accurately describes the entity's activities?

Sigfusson Northern Ltd. qualifies for the following categories, per the reporting requirements:

1) Importing into Canada goods produced outside Canada

Sigfusson Northern Ltd. imports goods mainly from the United States. Some small consumables are ordered through Amazon.

2) Distributing goods in Canada

Sigfusson Northern Ltd. hauls equipment and construction materials within Canada to the project sites.

3) Selling goods in Canada

Sigfusson Northern Ltd. sells heavy civil construction and general contracting work services in Canada. Works have occurred in Saskatchewan, Manitoba, and Ontario for the reporting year of 2023. Sigfusson Northern Ltd. operates in the (1) Mining, Quarrying, and Oil and Gas Extraction, (2) Construction, and (3) Manufacturing sectors with project types that include road and highway construction, bridge construction, mine site development, site reclamation, crushing, and sewer construction, among others. Sigfusson Northern Ltd. is awarded work as the prime contractor, or as the subcontractor, depending on the project. In the specified reporting year of January 1, 2023 – December 31, 2023, Sigfusson Northern Ltd. operated 130-140 jobs. Below is a list summarizing some of these activities:

Heavy Civil Construction

Landfarm channel, winter road construction, shoreline protection, debris cleanup, remediation works, clearing Right of Way for powerline work, installing foundations and anchors for powerline work, site clearing, pit pre-stripping, haul road construction, earthworks, and dam construction.

General Contracting

Construction of a Health Care Centre and its supporting buildings, and a water treatment plant

Crushing

Aggregates etc.

Please provide additional information on the entity's structure, activities, and supply chains

Sigfusson Northern Ltd. distributes goods for our jobsites and manufactures permanent infrastructure such as buildings, roads, and mine sites. Sigfusson Northern Ltd. manufactures modular buildings in addition to repairing, remanufacturing of parts, and manufacturing components for the company's field equipment. Sigfusson Northern Ltd. imports goods such as equipment parts, small consumables, various hardware, and some pre-assembled equipment with some of these goods purchased Duty Delivery Paid (DDP) from outside of Canada. The high value equipment purchased by Sigfusson Northern Ltd. from outside of Canada is cleared through Canada Customs by GHY International. Although Sigfusson Northern Ltd. purchases most goods from Canada and the United States, the company sometimes purchases small consumables through Amazon that may have originated outside of Canada or the United States. The majority of the company's suppliers are in Canada, with the odd parts supplier from the United States. As stated above, there be may the odd item that is purchased directly offshore through Amazon purchases. Sigfusson Northern Ltd.'s organizational structure chart can be provided upon request.

Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?

Sigfusson Northern Ltd. has always been deeply committed to establishing and enhancing ethical practices concerning its labour standards. While specific policies and due diligence processes related to forced labour and child labour were not formally in place during the previous reporting period, the entity has laid a strong foundation for addressing these critical issues since the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* was enacted January 1, 2024.

Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour.

Since its conception, the company has always been steadfast in its commitment to upholding human rights and ensuring ethical labour practices across its operations and supply chains. Recognizing that combating forced labour and child labour in supply chains is an ongoing global effort, the company continuously reviews and improves its corporate policies, work procedures, and operating practices.

Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

The company has not identified specific parts of its activities or supply chains that carry a risk of forced labour or child labour. The company is committed to continuously improving its practices and will continue to take proactive measures to ensure ethical labour standards are present across all of its operations and supply chain management.

Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all the apply.

Other, please specify:

Sigfusson Northern Ltd. has purchased most of its goods from within Canada. The majority of goods purchased from outside of Canada are purchased from the United States, but some of the small consumables Sigfusson Northern Ltd. used in the specified reporting period of 2023 were purchased from Amazon, which may have originated outside of the United States. Since the majority of what Sigfusson Northern Ltd. purchased is from major equipment manufacturers, reputable national chains, and other reputable sellers (MacMor, Grainger, U-Line, Princess Auto etc.), Sigfusson Northern Ltd. relied on our tier 1 suppliers to source goods responsibly, even though Sigfusson Northern Ltd. did not have a documented restriction on purchasing foreign made goods suspected of using forced labour or child labour in 2023.

Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable).

As of now, the entity has not identified any specific part of its activities and supply chains that carry a risk of forced labour or child labour being used. Consequently, no specific remediation measures have been necessary. However, the company is strongly committed to ethical business practices and is actively focused on ensuring that all operations remain free from such risks. Sigfusson Northern Ltd. kept an eye on news articles and industry news circulating about breaches in ethical governance and, as a general philosophy, refuses to conduct business with companies that do not govern themselves appropriately.

Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?

This section does not apply to Sigfusson Northern Ltd. for the specified reporting period of 2023. Sigfusson Northern has not identified any forced labour or child labour in our activities and supply chains.

Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable).

This section does not apply to Sigfusson Northern Ltd. for the reporting period of 2023.

Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour?

While no specific activities requiring remediation have been identified in the previous reporting year, the company remains vigilant and dedicated to supporting the change towards a global supply chain free of forced labour and child labour. Our proactive and inclusive operating practices and corporate policies ensure that we are prepared to address any risk promptly and effectively, reflecting our commitment to ethical and socially responsible business practices.

Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable)

The company has not needed to implement measures to remediate the loss of income to the most vulnerable families, as no instances of child labour or forced labour have been identified within its activities and supply chains. However, Sigfusson Northern Ltd. remains deeply committed to ethical practices and social responsibility, continuously striving to ensure the wellbeing of individuals involved in its operations.

Does the entity currently provide training to employees on forced labour and/or child labour?

Because the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* was enacted January 1, 2024, it was not historically required for the company to provide in-house training on forced labour and child labour for the reporting year of 2023. Sigfusson Northern Ltd. has since developed training and awareness programs to educate its workforce and supply chain partners about the importance of ethical labour practices and the broader social implications of supply chain risk. These training programs aim at raising awareness about the social impacts of labour practices and will help employees and suppliers understand the importance of considering the broader implications of one's actions.

Please provide additional information on the training the entity provides to employees on forced labour and child labour.

Although no training modules were required for the company in the previous reporting year, the company is dedicated to upholding the highest standards of ethical conduct and social responsibility. Sigfusson Northern Ltd.'s commits to launching extensive training programs aimed at increasing awareness about forced labour and child labour among employees and suppliers. These initiatives will focus on recognizing signs of unlawful practices in global supply chains, and understanding the legal and ethical obligations to prevent the risk of forced labour and child labour in supply chains.

Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

In the previous financial year, statements specifically targeting the prevention and reduction of forced labour and child labour in global supply chains were not formally included in corporate policy, despite the company continuously upholding high standards in ethical business conduct. The company has always ensured that all workers have been treated with dignity and have had their

human rights respected within in its operations and supply chains. Sigfusson Northern Ltd. recognizes the importance of addressing forced labour and child labour and has since developed a robust set of corporate policies. These policies explicitly prohibit any form of forced labour and child labour, and firmly states that all of Sigfusson Northern Ltd.'s operations align with international labour standards and best practices.

Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

Sigfusson Northern Ltd. always held high expectations for their suppliers although no formal risk assessment tool has been used to measure forced labour risk in supply chains during the 2023 reporting year. Since being enacted in 2024, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* has inspired the company to begin developing a Supplier Assessment Form designed to verify compliance with current labour standards. This form will involve a questionnaire, an internal review of the supplier's governing policies, and if required, an interview with the supplier to identify and mitigate risk related to forced labour and child labour within their goods or services.

APPROVAL AND 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 purpose of the Act, for the reporting year listed above.

Full Name: Tyler Bennett

Title: President and CEO

Date: 05/28/2024

Signature:  _____

I have the authority to bind Sigfusson Northern Ltd.