



TECVALCO

Bill S-211

An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Modern Slavery Statement for the Financial Year ended 2024:

Tecvalco Ltd. Is committed to conducting business in a legal, ethical, and responsible manner. We are opposed to human trafficking, forced labor, child labor, harassment and abuse, and other violations of human rights at any level, and we are committed to ensuring that the manufacturers and suppliers we work with meet our standards.

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 and to amend the Customs Tariff. This statement outlines the approach and initiatives by Tecvalco Ltd. to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing March 1, 2023 and ending February 28, 2024.

Group Structure

Tecvalco Ltd was incorporated in 1980. It operated under the Business name Tecvalco Ltd. with its head office in Niagara Falls, ON.

Supply Chain

Tecvalco Ltd operates across three manufacturing sites (with one parts warehouse) in Canada, and one Distribution Warehouse and a small Service Group, also in Canada. Tecvalco Ltd purchases goods for resale as part of our Distribution business, as well as parts and raw materials used in manufacturing. Over 95% of purchases were made within Canada or the United States. Less than 5% were purchases from China.

All goods sold are packaged in Canada. A small percentage of goods for resale may be purchased in the United States and drop shipped directly to a U.S. customer.

All of Tecvalco's supply chain activities take place from our Corporate Office in Ontario.

Our customers include major Public Utilities across Canada and into the U.S. as well as our Distribution Wholesale market.

Eastern Canada

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Risks in Supply Chain

Tecvalco Ltd. respects the human rights of our own employees and everyone we do business with and will never knowingly work with any supplier who does not do the same or takes part in child labour or forced labour practices.

While most of our procurement is within North America, we acknowledge that there is a risk of forced and/or child labour being used in our extended supply chain.

We fully understand how important risk mitigation and supplier management is in our supply chain process, including compliance with the Act.

To this end, and under our Procurement Sourcing Policy, we have identified gaps in our ability to assess Supplier's positions on forced and child labour, as well as Indigenous business and have refined our documentation and processes to help us better assess our suppliers and mitigate the risk of forced or child labour being used in our supply chain.

Actions Taken

Tecvalco Ltd. is committed to responsible corporate practices in human rights and working conditions that comply with the Canada Labour Standards, Canada Labour Code, Bill S-211, and the Canadian Human Rights Act.

No Child Labour

Tecvalco Ltd will not employ children below the minimum age of employment according to applicable law, in any case not under the age of 14. Furthermore, Tecvalco shall ensure that persons under the age of 18 do not perform any offshore duties or undertake any hazardous work that could jeopardize their health or safety, including night shifts and overtime. "Child labour" means any work by a child or young person, unless it is considered acceptable under the ILO Minimum Age Convention 1973.

No Forced Labour

Tecvalco Ltd does not tolerate any form of forced labour, including debt bondage, indentured labour or involuntary prison, nor any involvement in human trafficking in its business activities. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or service. Tecvalco will not unreasonably restrict worker's freedom of movement throughout company-provided facilities nor reasonably restrict worker's entering or exiting company provided facilities.

Recruitment Policy: Age and Eligibility

The Company does not employ anyone below the age of 14. Tecvalco prohibits the use of child labour and forced or compulsory labour in all Tecvalco sites. No employee is made to work against their will.

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Young workers (14-17) shall only be employed in non-hazardous activities, and appropriate safeguards for the health, safety, and development shall be in place.

An employees age will be verified with photo idea, birth certificate or passport.

Supplier Agreements:

As part of our Procurement Sourcing Policy, all suppliers will complete an onboarding package in order to be considered to do business with Tecvalco. This package includes an information questionnaire about their business, as well as our Supplier Ethics Statement, which must be acknowledged and signed off by a signing authority for the company. The package also includes a Self Declaration form for any supplier that is considered an Indigenous Business.

This process is being followed for all new suppliers and we are in the process of sending it out to all pre-existing suppliers for completion.

Our Supplier Ethics Statement is an extension of the principles of our Code of Conduct and our Anti-Slavery and Human Trafficking Policy. It outlines our commitment to always act with Integrity and do the right thing, and to work with Suppliers who share this commitment. The Supplier Ethics Statement outlines our expectations of our Suppliers when it comes to compliance with laws and standards, human rights, health and safety, Indigenous peoples and the environment as well as anti-bribery and anti-corruption and conflicts of interest.

While every Supplier will complete the onboarding package described above, including sign off of our Supplier Ethics Statement, we have also created a Supplier Questionnaire to be used if there arises any suspicion of wrongdoing or where, by definition of where a supplier is located, further scrutiny may be warranted. This questionnaire goes further than signing off on our Supplier Ethics Statement and asks very pointed questions related to the Supplier's practices. This will be based on the list of countries associated with human rights violations, provided by the United Nations.

Our Procurement Sourcing Policy defines our key principles and responsibilities as they apply to our purchasing activities. The Policy describes how we will work to satisfy our supply chain and operational needs while doing so ethically, for the good of all.

Risk Assessment:

Tecvalco Ltd has instituted several policies to mitigate the risks of against Forced Labour and Child Labour in Supply Chains, including Tecvalco Working Conditions, Recruitment Policy, Anti Slavery and Human Trafficking Policy, Supplier Code of Conduct, Supply Chain Transparency Policy, Procurement Sourcing Policy and Supplier Registration Form.

Third party mitigation steps:

At this time, we have not implemented any third-party mitigation steps as we have not yet found any evidence of forced or child labour in our supply chain group.

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Remediation

If forced labour is identified within a company, it is vital to act quickly and to protect the victim. If Tecvalco receives an allegation of forced labour or slavery, we will initiate investigation and verification and gather information. If the complaint concerns a supplier, review contractual terms and requirements to identify parties' obligations around modern slavery, potential breaches and any mechanisms that could be used to support the response. Determine if appropriate to pass the case onto a National Referral Mechanism or civil society organization.

Mitigate & Prevent Future Harm:

Develop a corrective action plan with learn timelines for and priority actions for development. Update contracts, codes of conducts, supplier terms and training tools to address any potential gaps and lessons learned. This may include amending policies or procedures and reassessing business models and purchasing practices.

Training

Training is provided to Human Resources, Supply Chain and the executive team including our policies and procedures related to Bill S-211.

The policy will be reviewed on an annual basis.

Effectiveness Assessment:

Tecvalco is committed to addressing the risks of forced labour and child labour in our business and our supply chain. As described above, Tecvalco has taken steps to close the gaps in our knowledge of our suppliers to be better able to assess them and to continue to monitor them going forward. We are in the process of setting up Supplier Scorecards.

While we have introduced measures to prevent and reduce the risks of forced and/or child labour, to date we do not have any data to assess the effectiveness of our measures. This will be an ongoing process.

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 February 28, 2024. It has been issued on behalf of Tecvalco Ltd and approved by Mike Menger, President.

Signed,

Mike Menger
President
Tecvalco Ltd.

Date: 5/27/24

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