
Fighting Modern Slavery Report

This Report has been prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). The Report is a joint report that covers the period from January 1, 2023 to December 31, 2023 for Timberland Equipment Limited (“TEL”), a limited corporation formed in Ontario, and its wholly owned Canadian subsidiary, Hawboldt Industries (1989) Limited (“HAW”), a limited corporation formed in Nova Scotia. Together the companies meet the business presence and size-related thresholds to be considered a reporting entity under the Act.

Locations

Timberland Equipment Limited - 459 Industrial Ave, Woodstock, ON N4S 7Z2

Hawboldt Industries (1989) Limited - 220 NS-14, Chester, NS B0J 1J0

Structure, Activities and Supply Chains

TEL and HAW, along with TEL’s wholly owned US subsidiary, TSE International, Inc. (“TSE”) form The Timberland Group (“TEG”).

TEG is a group of companies that specialize in engineering and manufacturing heavy lifting, hoisting, mooring, winching and material handling solutions. TEG has more than 100 years of expertise working around the world in the electric power and utilities, construction, mining, marine and offshore energy markets supplying innovative engineered solutions and equipment for everything from stringing electric power lines to mineshaft construction to research vessel equipment to helping resource companies in complex extraction situations.

Purchasing activities are conducted by local purchasing departments at each of the companies in the group. Each purchasing department reports to the Purchasing Manager, who in turn reports to the General Manager of their respective company.

TEG works with a large number of suppliers, located inside and outside of Canada, who provide the material and services necessary to manufacture our equipment. Given the large number of suppliers, and diverse nature of the material and services required to produce our equipment, TEG has limited visibility of its supply chain beyond its first tier of suppliers. However, TEG is committed to improving transparency and understanding the risks associated with forced and child labour in its supply chain.

Policies and Due Diligence

As of December 31, 2023 TEG did not have any formal policies or due diligence procedures with respect to forced and child labour.

In 2024, TEG implemented the following policies:

- *Forced Labour Policy* – sets out the legal and ethical standards of conduct, with respect to forced and child labour, under which TEG requires personnel to comply.

This policy forbids the use of forced and child labour, as defined in the Act, in both TEG's operations and supply chains.

- *Supplier Code of Conduct* – details TEG's minimum expectations and non-negotiable requirements for suppliers in the areas of human rights and labour practices; environmental management; professional conduct; and governance. It includes the commitment that suppliers prohibit the use of forced and child labour in their operations and supply chain. The code of conduct is a fundamental contractual requirement for TEG suppliers.

In 2024, TEG initiated the development of:

- *Supply Chain Risk Review* – TEG is in the process of developing a procedure to thoroughly assess the risk of forced labour and child labour more thoroughly in its supply chain.
- *Employee Training* – TEG is in the process of developing training for employees involved in purchasing and recruiting/hiring functions of the group. The training will be mandatory for these personnel and will educate them on TEG's Forced Labour Policy and Supplier Code of Conduct.

Forced Labour and Child Labour Risks

TEG has performed an assessment of its operations and determined that its operations are at low risk for forced and child labour. This is due to TEG's commitment to complying with all applicable labour legal frameworks and to TEG's own high ethical standards.

TEG has assessed the risk of forced labour and child labour in its supply chain by reviewing the [Global Slavery Index 2023](#) and identifying those products which are used in TEG's manufacturing processes. These are included in the report as potentially higher risk. Based on the Global Slavery Index, electronics and electrical supplies could pose a potential risk of forced labour or child labour in TEG's supply chain.

Remediation Measures

TEG has not identified any instances of forced or child labour in its operations or supply chains. As such, no remediation measures have been taken to date.

Remediation of Loss of Income

TEG is not aware of any instance where efforts to prevent and reduce risk of forced or child labour have contributed to loss of income for vulnerable families.

Training

As of December 31, 2023 TEG did not have formal training available to employees with respect to forced or child labour. In 2024, TEG started the development of training for employees involved in purchasing and recruitment activities.

Assessing Effectiveness

TEG does not have a formal process for assessing effectiveness in the prevention and mitigation of forced and child labour. Going forward, TEG will conduct an annual review of its policies and procedures relating to forced and child labour.

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 purposes of the Act, for the reporting year listed above.



May 15, 2024

Brad Vollmershausen
CEO, Timberland Group

Date

I have authority to bind Timberland Equipment Limited.