

Lode-King Industries

Compliance Report under The Fighting Against Forced Labour and Child Labour in Supply Chains Act

For the reporting period of September 1, 2022, to August 31, 2023

Business Number: 121472385

Lode-King Industries (Lode-King) acknowledges the critical importance of ethical supply chain practices and the role of businesses in preventing and addressing forced labour and child labour worldwide. As a manufacturing entity, our journey towards establishing formal policies and commitments in this area is ongoing. We recognize that ethical supply chains are not only a legal obligation under *The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) but also a moral imperative that aligns with our values and the expectations of our stakeholders.

Guiding Principles

Lode-King is led by guiding principles that include:

- A commitment to community, including employees and suppliers.
- Integrity and respect in our relationships
- Honesty and fairness in our dealings

These guiding principles commit us to being a premier employer for our employees and developing lasting relationships with our suppliers.

Our Structure

Lode-King is a privately owned Canadian corporation that employs over 400 employees.

Business Activities and Supply Chains

Lode-King operates a manufacturing facility in Winkler, Manitoba, where commercial highway transport trailers are produced for sale throughout North America.

Lode-King relies on suppliers that are primarily located within North America but does include suppliers located in Europe and Asia as well. The company’s employees are located exclusively in Winkler, where Lode-King manufactures commercial highway transport trailers from start to finish.

Policies and Due Diligence Processes in Relation to Forced or Child Labour

Lode-King informally evaluates potential and current suppliers to ensure that all suppliers align with its standards for its supply chain, including that the suppliers we do business with engage in responsible business conduct.



Forced Labour and Child Labour Risks and Steps Taken to Assess and Manage These Risks

Lode-King faces heightened risks of forced labour and child labour due to the following factors inherent to operational and supply chain complexities:

1. Lode-King relies on a vast network of vendors and suppliers, spread across various countries, each with its unique legal and regulatory frameworks. The diversity and number of vendors contribute to the complexity of monitoring and ensuring compliance with ethical labour standards, increasing the risk that forced or child labour may be found.
2. The multi-tiered nature of supply chains, especially at the tier 2 and tier 3 levels, further compounds Lode-King's risk. Lode-King has less of a direct connection with its tier 2 and tier 3 suppliers, again increasing the risk that forced and child labour may be found.

To address these risks, Lode-King aims to develop relationships with its suppliers. This includes site visits with our primary suppliers to gain a better understanding of their operations. Lode-King also considers that certain countries or regions in its supply chains post a higher risk of forced and child labour based on their legal frameworks and enforcement practices.

With respect to mitigating against forced labour in our own activities, Lode-King pays fair wages and complies with its obligations under The Employment Standards Code. We also ensure that we are providing a safe workplace and comply with our obligations under The Workplace Safety and Health Act. We acknowledge our human rights obligations as an employer and do not employ discriminatory practices under The Human Rights Code. With respect to child labour, we follow the requirements with respect to young workers under The Employment Standards Code and its Regulations.

Remediation Measures

We have not been required to take any measures to remediate forced labour or child labour as there has not been instances of this identified. Additionally, we have not been required to take any steps to remediate the loss of income to the most vulnerable families because of steps taken to eliminate forced labour or child labour risks as no instances have been identified.

Training

Lode-King recognizes the critical role that education and awareness play in preventing forced and child labour. In alignment with our goal to create ethical business practices and compliance with the Act, we will provide necessary training to appropriate parties within Lode-King to aid in preventing forced and child labour.

Additionally, each employee at Lode-King is required to review our Worker Rights and Responsibilities policy to ensure they understand worker rights.



Assessing Effectiveness


On a go forward basis, Lode-King plans to develop and monitor relevant performance indicators to determine the effectiveness of our assessments and to regularly review our own policies and procedures related to forced labour and child labour.



ATTESTATION FORM

May 25, 2024

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 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.



I have the authority to bind Lode-King Industries

Terry Elias
President & CEO