

# Williams Scotsman of Canada, Inc.

## Fighting against Forced Labour and Child Labour Report

### 1 Introduction

- 1.1 Williams Scotsman of Canada, Inc. ("**WillScot Canada**") is committed to acting ethically and with integrity in all of our business dealings and relationships, and to protecting the dignity and rights of all people connected to our business. We strive to work closely with our suppliers to ensure their workforce, and the workforce of their supply chains, are treated with respect and dignity.
- 1.2 This is WillScot Canada's first report pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and it will be reviewed annually. We acknowledge that eradicating the risks of forced labour and child labour is a process that will take time. This report outlines the measures we have in place to address these risks in our business and supply chain.

### 2 Our organisational structure and business operations

- 2.1 WillScot Canada is in the site solution and manufacturing sectors, providing modular space and storage solutions to various industries. It is the Canadian subsidiary of Williams Scotsman, Inc., with the ultimate parent company being WillScot Mobile Mini Holdings Corp., a publicly traded corporation incorporated in the United States of America. We refer to the WillScot Mobile Mini Holdings Corp., and its subsidiaries and affiliates as the "**WillScot Mobile Mini Group**" in this report. As a member of the WillScot Mobile Mini Group, all policies and measures within the WillScot Mobile Mini Group referenced in this Report apply to WillScot Canada.
- 2.2 All Canadian operations and business conducted by the WillScot Mobile Mini Group is conducted by WillScot Canada, a Canadian corporation. WillScot Canada employs approximately 250 employees and has business operations throughout Canada and the United States. Its activities include the production, customization, modification, lease and sales of temporary modular space and portable storage containers.
- 2.3 To learn more about our business, please see <https://www.willscot.ca/>

### 3 Our supply chain

- 3.1 WillScot Canada purchases modular space and portable storage containers, components, and construction materials such as flooring, fasteners, HVAC materials, and safety equipment, primarily from suppliers located in Canada and the United States. We lease and resell modular space and storage containers in the Canadian market.
- 3.2 Our supply chain also includes ancillary services that contribute to our main production operations, such as transporters and carriers.
- 3.3 Within WillScot Canada's operations, we have assessed our risk profile based on sector and industry risks as low. All of our workers are employed in Canada, where we have fair and responsible employment practices in place to protect and promote workers' rights. Throughout the WillScot Mobile Mini Group, we respect workers.
- 3.4 WillScot Canada's supply chain encompasses a broad range of goods and services from international (mainly China and Mexico), national and local suppliers. A majority of our supply chain employs suppliers from Canada and the United States. Through our policies with our suppliers, we have set

the expectation that they comply with their obligations under law and take appropriate measures to reduce and prevent the risk of forced labour and child labour.

- 3.5 That said, we recognise that risks of forced labour may be present in our supply chain, including the manufacturing sector. We are also aware of parts of the supply chain where potential unskilled, temporary or outsourced labour is used by vendors in the manufacturing process. Since such workers are not employed directly by WillScot Canada or the WillScot Mobile Mini Group in the United States, we have less control and visibility over their working conditions and employment terms and we continue to tailor our risk management actions to address those concerns. Namely, we continue our efforts to classify supplier risks to identify and improve our understanding of forced labour risks.

#### 4 Actions taken to combat forced labour risks

- 4.1 Building on the policies and procedures we currently have in place, WillScot Canada is continually developing and implementing strategies in order to assess and better understand areas of potential risk in our business and supply chain. Through our processes and policies, we aim to mitigate and eliminate these risks.
- 4.2 WillScot Canada anticipates that its supply chain may be susceptible to risks of forced labour. WillScot Canada assesses and manages those risks by maintaining consistent and high standards of due diligence and risk mitigation processes to avoid forced labour in all environments in which WillScot Canada operates in, including developing and implementing our policies, processes and actions.

#### 5 Our policies

- 5.1 Our **Code of Business Conduct and Ethics** is the core of our values and our operations. The Company complies with applicable laws and regulations in conducting its business, and we expect our team members to do the same. Obeying the law, both in letter and spirit, is the foundation on which our ethical standards are built. We require our employees to respect and obey the laws, rules and regulations applicable in the jurisdictions in which the Company operates. Our Business Code of Conduct and Ethics is available on our website at: <https://www.willscotmobilemini.com/static-files/2fae73e7-a416-458d-888b-a0ec3ee9f7f7>
- 5.2 WillScot Canada is committed to ethical and socially responsible conduct in the workplace. This includes health and safety and employment standards. Upon hire, WillScot requires all employees to read and acknowledge our Employee Handbook, which contains our Code of Business Conduct and Ethics. We have dedicated human resource teams to ensure compliance and provide employees with employee handbooks and policies applicable to their jurisdiction to ensure our employees are aware of our practices, and to ensure our employees adhere to WillScot ethical standards.
- 5.3 WillScot Mobile Mini Group's **Human Rights Policy** reflects our commitment to acting ethically and with integrity in all our business relationships and to enforcing effective systems and controls to prevent forced labour from taking place in our business and supply chain. Our Human Rights Policy can be found on our website at: <https://www.willscotmobilemini.com/static-files/0e423a56-77dc-4a0a-bb29-80a67414bec0>.
- 5.4 WillScot Mobile Mini Group makes sure its suppliers are aware of its policies and adhere to the same high standards. Our **Vendor/Supplier Code of Conduct** sets forth our expectations of all suppliers of goods and services to the Group related to human rights and ethical business practices. Our Vendor/Supplier Code of Conduct can be found on our website at: <https://www.willscotmobilemini.com/static-files/056957cb-5998-4b06-959e-30be33aca51e>.
- 5.5 WillScot Mobile Mini Group has a **Vendor/Supplier Ethics Statement** requiring vendors and suppliers to agree to a contractual provision which obligates suppliers to comply with the organisation's Supplier Code of Conduct and Human Rights Policy. WillScot's Vendor/Supplier Ethics Statement can be found on our website at: <https://www.willscotmobilemini.com/static-files/43176d6a-92e9-449a-afdb-9678a0edcaff>.

- 5.6 WillScot Mobile Mini Group's **Health & Safety Culture Policy** demonstrates its commitment to preventing and reducing the risk of injury or occupational illness to our employees and the accidental loss of any of its resources and physical assets. Suppliers should provide and maintain a safe and healthy work environment, in accordance with industry standards and in compliance with (i) all applicable federal, state/provincial and local safety and health laws and standards and Department of Transportation (DOT) regulations, as well as those standards set forth by the Company and the American National Standards Institute (ANSI) and Occupational Safety and Health Administration (OSHA), (ii) provide a safe work environment that is free from recognized hazards and (iii) implement proactive measures to prevent accidents that cause bodily injury or property damage to employees, customers, vendors and the general public. WillScot's Health & Safety Culture Policy can be found on our website at: <https://www.willscotmobilemini.com/static-files/a17f5633-319d-495d-8d90-de75fdc5742c>. In addition to the Health & Safety Culture Policy, WillScot Mobile Mini Group has extensive site-specific safety policies, plans and procedures in compliance with applicable laws.
- 5.7 WillScot Mobile Mini Group has established a Code of Business Conduct and Ethics to ensure our employees comply with the law and regulations applicable to our business and to maintain the highest standards of ethical conduct. As part of our **Whistleblower Policy**, we expect and encourage employees of suppliers to report any suspected violations or concerns as to compliance with laws, regulations, our Code of Business Conduct and Ethics or other Company policies to his/her supervisor or to our "Whistleblower" hotline or website. WillScot's Whistleblower Policy can be found on our website at: <https://www.willscotmobilemini.com/static-files/3bfcaa67-d92e-4213-8389-806761a4ea0c>.

## 6 Our due diligence processes

- 6.1 In order to identify and manage risks of forced labour and human trafficking in our own business, periodically reassess our employment practices to ensure we meet or surpass employment standards in all jurisdictions in which we operate.
- 6.2 We are constantly in the process of reviewing and improving our approach to supplier due diligence with the aim of ensuring a more robust action plan to address forced labour risks. As part of our initiative to identify forced labour risks in our supply chain, we are currently in the process of completing a supplier risk-mapping assessment, starting with our key suppliers.
- 6.3 As part of our initiative to identify forced labour and mitigate associated risks in our business and supply chain, we have adopted the following due diligence procedures:
- (a) Supplier Certification of the acceptance of our Vendor/Supplier Code of Conduct through our e-procurement system;
  - (b) We continue to develop processes to verify, evaluate and address supply chain issues related to human trafficking and forced labour; and
  - (c) We require employees to read and acknowledge our Employee Handbook, which contains our Code of Conduct and provides Code of Conduct training.

## 7 Supplier adherence to our values

- 7.1 WillScot Canada seeks to do business exclusively with suppliers that have similar values, ethics and moral business practices. WillScot Canada will not tolerate any form of forced labour and human trafficking within its supply chain.
- 7.2 To ensure all those in our supply chain and all contractors comply with WillScot Canada's values we have in place a supply chain compliance program. At the core of this compliance program is the **Vendor/Supplier Code of Conduct**, and failure to comply with the terms of this Code may jeopardize a supplier's relationship with WillScot Canada. Key provisions include:
- (a) **Human Rights:** Vendors shall (i) treat all of their workers fairly and with dignity, (ii) adopt an approach to human rights consistent with the United Nations Universal Declaration of Human

Rights, and the International Labour Organization's Declaration of Fundamental Principles and Rights at Work, (iii) support and respect the protection of internationally proclaimed human rights, and (iv) ensure that they are not complicit in human rights abuses WillScot Canada is continuing to develop processes to verify, evaluate and address supply chain issues related to human trafficking and forced labour.

- (b) **Freedom of Association:** Where legally authorized, Vendors shall respect their employees' rights and freedom of association to join or form trade unions and to bargain collectively, or to conduct similar activities.
- (c) **Employment Practices:** Vendors shall not (i) use any form of slave, forced, bonded, indentured, or involuntary labour, and shall fully comply with all laws that prohibit the use thereof, as and when applicable, (ii) engage in human trafficking or exploitation, (iii) import goods tainted by forced labour or human trafficking, or (iv) retain employees' government-issued identification, passports or work permits as a condition of employment.
- (d) **Anti-discrimination, Equal Opportunity:** Vendors shall provide a workplace free of harassment and discrimination in which their employees are treated fairly and respectfully. In the United States, vendors shall make good faith efforts to identify and, where available and appropriate, use suppliers certified as minority, women, disabled person, lesbian, gay, bisexual, transgender and/or U.S. veteran-owned.
- (e) **Underage Labour:** Vendors shall not use underage labour as defined by applicable law regulating minimum legal age to work. Workers below the age of 18 shall not be employed in jobs that are likely to jeopardize the health and safety of young workers.
- (f) **Employment Status:** Vendors shall employ only workers who are legally authorized to work in their location. Vendors are responsible for validating employees' work eligibility status.
- (g) **Compensation and Working Hours:** Vendors shall provide all workers with accurate information about their wages, mandated benefits, and any other basis of their compensation. Vendors shall comply with applicable labour laws governing working hours and employee compensation in all locations in which they operate.
- (h) **Whistleblower Protection and Anonymous Complaints:** Vendors shall protect the confidentiality of their whistleblower employees, prohibit retaliation, and, where legally permitted, provide an anonymous complaint mechanism for their employees to report grievances.
- (i) **Health and Safety:** Vendors shall (i) provide their employees with a safe workplace, (ii) have reasonable procedures to detect, prevent and handle potential risks to the health, safety and security of employees, and (iii) follow all applicable laws relating to health and safety in the workplace.

7.3 We have included anti-forced labour provisions in our standard terms and conditions that are used with our suppliers and ensure that such provisions are included in all contracts as appropriate. To ensure all suppliers and contractors in our supply chain comply with our values, we require suppliers to conform to our Vendor/Supplier Code of Conduct.

## 8 Training

- 8.1 We provide annual training about WillScot Mobile Mini's Code of Business Conduct and Ethics. This training covers our commitment to business ethics, human rights, compliance with law, and health and safety, amongst other important values. This training is mandatory for all employees.
- 8.2 We are committed to compliance with applicable labour and employment laws wherever we operate. We make efforts to ensure that employees are aware of the concepts in our policies through training programs conducted annually.

## 9 Remediation measures

- 9.1 To date, we have not identified any instances of forced labour or human trafficking in our business and supply chains. Therefore, we have not taken remedial measures and we have not taken measures to remediate the would-be loss of income to vulnerable families.

## 10 Effectiveness in combatting forced labour risks

- 10.1 To date, WillScot Canada's actions to assess the effectiveness of our policies and programs include:
- (a) We have conducted Code of Business Conduct and Ethics training for all staff throughout WillScot Mobile Mini Group's operations; and
  - (b) There have been no reported breaches of our relevant policies within WillScot Canada's operations with respect to forced labour or child labour.

## 11 Approval of the Report

- 11.1 WillScot Canada has acted in consultation with the WillScot Mobile Mini Group in preparing this report.
- 11.2 This report is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes WillScot Canada's forced labour report for the financial year commencing on January 1, 2023 and ending on December 31, 2023.
- 11.3 This report was approved by the Board of Directors of WillScot Canada pursuant to Paragraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on **May 28, 2024**.
- 11.4 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.

Signed

By: Hezron Lopez  
Hezron T. Lopez  
EVP, Chief Legal and Compliance Officer & ESG  
Date: May 29, 2024

I have the authority to bind Williams Scotsman of Canada, Inc.