

## FORCED LABOUR IN CANADIAN SUPPLY CHAINS REPORT HITACHI CONSTRUCTION TRUCK MANUFACTURING LTD.

### ANNUAL REPORT

This report has been prepared in compliance with *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"), covers the fiscal year starting April 1, 2024 and ending March 31, 2025, and outlines the steps taken by **HITACHI CONSTRUCTION TRUCK MANUFACTURING LTD.**

#### PREVENTION AND REDUCTION OF RISK

**HITACHI CONSTRUCTION TRUCK MANUFACTURING LTD.** ("**HTM**") has published a code of conduct that includes provisions regarding respect for human rights, and is based on the policies implemented by the Hitachi Construction Machinery Group ("**HCM Group**").

HTM incorporated contractual compliance clauses into supplier agreement and is in a process of developing the supplier code of conduct, which strictly prohibits the use of forced labour, child labour, and other forms of exploitation.

#### STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

HTM is a member of the HCM Group. HTM is a federal Canadian corporation that produces off road rigid dump trucks, and distributes aftermarket parts worldwide. HTM operates from a facility located in Guelph, Ontario that is approx. 1.19 million square feet. HTM has over 100 employees.

## **POLICIES AND DUE DILIGENCE PROCESSES**

HTM has established a Code of Conduct for the Canadian business, and has adopted the HCM Group Human Rights Policy. HTM undertakes initiatives for respecting human rights pursuant to its Code of Conduct and the HCM Group Human Rights Policy.

The HCM Group Human Rights Policy was established in March 2014 and references a required understanding of human rights as described in the International Bill of Human Rights and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and references human rights due diligence based on the United Nations Guiding Principles on Business and Human Rights.

## **FORCED LABOUR AND CHILD LABOUR RISKS**

HTM has assessed the risk of forced labour and child labour within its own operations as low, based on factors such as the country of operation, industry sector, and the nature of our business activities. All employees are based in Canada, a jurisdiction with strong labour protections and regulatory oversight. HTM upholds fair and responsible employment practices to safeguard the rights and well-being of its workforce.

That said, we recognize that the risk of modern slavery may exist within our supply chain, particularly due to the geographic location of certain manufacturers and the limited visibility into lower-tier suppliers. The complexity of global supply chains, and the challenge of tracing raw material sources, makes it more difficult to fully identify and mitigate potential labour-related risks beyond our direct suppliers.

HTM incorporated contractual compliance clauses into supplier agreement and is in a process of developing the supplier code of conduct, which strictly prohibits the use of forced labour, child labour, and other forms of exploitation.

## **MEASURES TO REMEDIATE FORCED LABOUR AND CHILD LABOUR**

HTM has not identified any instances of forced labour or child in its supply chain. HTM incorporated contractual compliance clauses into supplier agreement and is in a process of developing the supplier code of conduct, which strictly prohibits the use of forced labour, child labour, and other forms of exploitation.

## **MEASURES TO REMEDIATE LOSS OF INCOME**

HTM has not identified any instances of forced labour or child in its supply chain. HTM is in a process of developing specific policies and processes internally to identify forced labour and child labour risk in its supply chain, and take measures to address and remediate such risks.

## **EMPLOYEE TRAINING AND AWARENESS**

HTM has conducted employee training annually for all Canadian employees regarding compliance with the HTM Code of Conduct, including business and human rights.

## **ASSESSING EFFECTIVENESS IN PREVENTING FORCED LABOUR AND CHILD LABOUR**

HTM will assess effectiveness as new policies and processes related to identifying and remediating forced labour and child labour risks are implemented.

**APPROVAL AND ATTESTATION**

This report has been approved by the board of directors of **HITACHI CONSTRUCTION TRUCK MANUFACTURING LTD.**

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.

DocuSigned by:

*Ikuo Kishida*

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Name: Ikuo Kishida

Title: Chief Executive Officer & Director

Date: May 30, 2025

*I have the authority to bind **HITACHI CONSTRUCTION TRUCK MANUFACTURING LTD.***