



Modern Slavery Report | 2025

Nors GW

2025 Report

This Report issued by Nors Construction Equipment Canada GW Ltd. (Formerly Great West Equipment) is for the reporting period of January 1, 2024, to December 31, 2024, and has been produced in accordance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). This report affirms our continued commitment to transparency, ethical business practices, and the protection of human rights. It outlines the concrete steps taken during fiscal year 2024, while building upon the foundational work completed in 2023, to identify, assess, and mitigate risks related to modern slavery across our operations and supplier relationships.

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1. Introduction

As part of a Global Organization, Nors Construction Equipment Canada GW Ltd. (Nors GW) recognizes its responsibility to uphold the highest standards of integrity and fairness, both within our own workforce and across our extensive supplier and contractor networks. Our commitment to preventing forced and child labour is rooted not only in regulatory compliance, but in our values with respect, accountability, and the pursuit of sustainable business.

Throughout 2024, we have expanded and refined our due diligence process, enhanced supplier engagement, and further embedded human rights considerations into our procurement and operational practices. These efforts are reflected in this report, which demonstrates our approach to risk identification, ongoing monitoring, capacity building, and collaboration with stakeholders who share our values.

We continue to hold our suppliers, contractors, agents, and partners to these same standards, expecting full adherence to all applicable laws and ethical principles. By working together, we strive to ensure our supply chain reflects a commitment to human dignity, safe working conditions, and responsible conduct at every level.

2. Our Operational Structure, Activities, & Supply Chain

2.1. Structure & Activities

Nors Construction Equipment Canada GW Ltd. (Nors GW) is a multiline equipment dealer originally founded in 1987. In 2024, Nors GW became a subsidiary of the Nors Group, a Portuguese-based corporation with a global footprint spanning multiple continents. While now part of this international network, Nors GW continues to operate independently, maintaining local leadership and operational autonomy throughout the 2024 fiscal year.

Headquartered in Vernon, British Columbia, Nors GW operates 12 strategically located branches across British Columbia, Yukon, and, as of the end of 2024, Manitoba, where we support a diverse range of industries including construction, forestry, oil & gas, and mining. Our core business activities include the sale, rental, servicing, and parts distribution of heavy equipment, as well as the delivery of performance-driven solutions to maximize uptime and productivity for our customers. We also offer remanufacturing and component exchange services, and procure a variety of goods and services, such as shop consumables, transportation and logistics, and machine attachments to further support our operational capabilities and enhance customer value.

2.2. Our Supply Chains

Nors GW's global supply chain serves as a critical link between our operations and a diverse network of trusted vendors. This network includes third-party contractors, service providers, distributors, consultants, transportation companies, and manufacturers, all of whom play a vital role in helping us meet our operational goals and customer commitments.

The procurement of goods and services required to support our business is managed by various teams across the organization, depending on the scope and specialization of the product or service.

In 2024, Nors GW actively sourced from approximately 500 vendors across 14 countries, including Canada and the United States. A significant portion of our equipment and parts are procured directly from Original Equipment Manufacturers (OEMs), with Volvo being our largest supply partner. Other key OEM relationships include Metso, Madill, and Sennebogen, among others.

2.3. Supply Chain Mapping

In 2023, Nors GW launched a large-scale initiative to begin mapping out a global supply chain network. This project aimed to build a comprehensive understanding of our supplier relationships, identify potential vulnerabilities, and strengthen our due diligence processes related to modern slavery and child labour risks.

Mapping our supply chain has been a critical step in allowing Nors GW to advance our human rights commitments. By gaining visibility into where and how the products and services we rely on are sourced, we are becoming better equipped to:

- Assess and address risks of forced or child labour at every stage of the supply chain.
- Prioritize higher risk sectors, regions, and supplier categories for further review or engagement.
- Ensure accountability throughout multiple tiers of the supply chain.
- Enhance our ability to respond proactively to emerging risks or concerns.

This work continued throughout 2024, involving collaboration across multiple departments and teams responsible for procurement and vendor management. As part of this ongoing effort, we began engaging not only with our Tier 1 suppliers (those we have a direct relationship with) but also initiated work to expand visibility into Tier 2 suppliers, our suppliers' own suppliers, referred to as "multi-tier supply chain mapping."

This deeper level of mapping is crucial for detecting and mitigating hidden risks that may not be evident in direct business relationships. By continuing to build this transparency, Nors GW is laying the groundwork for a more resilient and ethical supply chain ecosystem into the future.

[Nors GW | Supply Chain Mapping](#)

3. Our Policies & Due Diligence Processes in Relation to Modern Slavery

At Nors Construction Equipment Canada GW Ltd. (Nors GW), we are committed to upholding the highest standards of ethical conduct and human rights across our operations and throughout our supply chain. Our approach is informed by internationally recognized frameworks, including the United Nations Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as applicable employment laws and human rights legislation in the jurisdictions where we operate.

In alignment with these principles and in accordance with all relevant legislation, Nors GW fully supports the elimination of all forms of modern slavery, both within our workplaces and extending across our global supply chains.

Our strategy for ensuring alignment with human rights principles, including the prevention of forced and child labour, is guided by a combination of internal policies, supplier expectations, and a continually evolving program of risk-based due diligence.

3.1. Key Policies

To support our commitment to ethical business conduct and the prevention of forced and child labour, Nors GW has implemented a series of foundational policies that guide both internal operations and our interactions with third parties:

Code of Conduct | Nors GW's Code of Conduct defines the standards of ethical and professional behavior expected from all employees, contractors, and representatives of the organization. It reinforces our commitment to integrity, respect, and compliance with applicable laws, including those related to labour rights and workplace practices.

Supplier Code of Conduct | Nors GW has implemented our Supplier Code of Conduct, which outlines the expectations of its suppliers in the areas of business ethics, legal compliance, labour and human rights, and environmental sustainability. This Supplier Code of Conduct is cascaded to our first-tier suppliers. Nors GW expects such suppliers to embed these principles into their own operations and disseminate them to their own supply chains.

Diversity and Inclusion Policy | Our Diversity and Inclusion Policy promotes a workplace culture that values diversity, ensures equity, and fosters inclusion. It supports the elimination of discriminatory practices and emphasizes the fair treatment of all individuals regardless of background, identity, or circumstance.

Sustainability Policy | Nors GW's Sustainability Policy guides our commitment to environmental responsibility, ethical sourcing, and long-term social impact. It reflects our broader goal of supporting sustainable practices across our operations and supply chain.

Indigenous Relations Policy | This policy outlines our dedication to building meaningful and respectful relationships with Indigenous communities. It supports inclusive business practices, economic participation, and reconciliation efforts in alignment with Canada's Truth and Reconciliation Commission's Calls to Action.

Anti-Bribery and Anti-Corruption Policy | Our Anti-Bribery and Anti-Corruption Policy prohibits bribery, facilitation payments, and other corrupt practices across all aspects of our business. It ensures transparency, fairness, and compliance with local and international anti-corruption laws.

Whistleblower Policy | The Whistleblower Policy provides employees, suppliers, and stakeholders with confidential channels to report suspected ethical breaches, including concerns related to forced or child labour. It ensures protection against retaliation and facilitates prompt investigation and response.

Procurement Policy | Nors GW's Procurement Policy outlines procedures for the ethical sourcing of goods and services. It embeds social responsibility, supplier evaluation, and risk mitigation measures into procurement decisions to support our broader ESG commitments.

3.2. Due Diligence

In 2024, Nors Construction Equipment Canada GW Ltd. (Nors GW) continued to advance and formalize its due diligence practices to identify, assess, and address the risks of forced and child labour within its supply chain. These efforts build on the foundation laid in 2023 and reflect our growing maturity in responsible sourcing and supply chain transparency. Key practices we have implemented include:

Integration of Supplier Code of Conduct into Contracts | We are continuing the integration of our Supplier Code of Conduct into approved vendor agreements. This establishes formal expectations around ethical business practices, human rights, labour standards, and compliance with applicable laws. It ensures that suppliers are contractually obligated to uphold Nors GW's standards for ethical conduct.

Enhanced Vendor Onboarding and Risk Evaluation | Nors GW has improved our standardized onboarding process for all suppliers, which captures relevant due diligence data at the point of engagement. This includes vendor classification, ownership structure, insurance, certifications, and DEI (diversity, equity, and inclusion) status. Suppliers are also screened based on risk factors such as geography, industry, and the nature of the goods or services provided. High-risk suppliers may be subject to additional scrutiny or documentation requirements. The onboarding process further includes a review of HSE compliance and human rights policies to ensure ethical alignment prior to contract execution.

Internal Awareness and Training | Nors GW continues to build internal awareness among procurement and management personnel regarding modern slavery risks. Key staff are provided with guidance and support on how to recognize potential red flags, ask the right questions during supplier interactions, and elevate concerns to the proper channels.

Monitoring and Escalation Protocols | We are implementing internal procedures to support the monitoring of supplier compliance. These include routine vendor performance reviews, documentation audits, and defined escalation pathways for cases of non-compliance. Suspected breaches of our Supplier Code of Conduct may result in investigation, remediation, or termination of the supplier relationship.

Whistleblower Mechanism | Nors GW maintains a Whistleblower Policy that provides safe, confidential channels for employees, suppliers, and third parties to report ethical concerns, including suspected instances of forced or child labour. All reports are taken seriously and investigated in accordance with internal protocols, with protection against retaliation for all whistleblowers.

Remediation Measures | To date, Nors GW has not identified any instances of forced or child labour within its operations or first-tier supply chain. However, we recognize the importance of having procedures in place should such issues be uncovered.

In alignment with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, Nors GW is currently developing a framework to guide remediation efforts, which will include:

- Investigating all substantiated concerns thoroughly and promptly
- Working collaboratively with affected suppliers to develop corrective action plans
- Avoiding abrupt disengagement where possible, to prevent unintentional harm to vulnerable workers and their families
- Exploring responsible transition strategies, including the mitigation of income loss to impacted individuals, particularly in regions where livelihoods may be dependent on at-risk supply chains.

This approach will be refined as part of our broader Vendor Risk Management Program, with escalation protocols and remedial measures embedded in future audit and monitoring processes.

3.3. Due Diligence Looking Forward

To further strengthen our efforts and align with international best practices, Nors GW has begun exploring and/or implementing the following measures:

Supplier Self-Assessments | Suppliers will be invited to complete self-assessment questionnaires related to labour practices, employment conditions, subcontractor management, and human rights policies. This helps identify areas requiring follow-up and builds awareness across the supply chain.

Ongoing Multi-tier Supply Chain Mapping | Our supply chain mapping initiative, launched in 2023, continued into 2024 with the goal of expanding visibility into Tier 2 suppliers (our suppliers' suppliers). This effort supports deeper supply chain traceability and enables more proactive identification of risk points.

Collaborative Supplier Engagement | In 2025, we aim to start initial outreach to key suppliers to share expectations, build partnerships around ethical sourcing, and encourage capacity building in areas such as responsible recruitment and labour protections.

Future Audit Readiness | While Nors GW has not yet launched a formal supplier audit program, we are developing the framework and criteria for risk-based third-party assessments as part of our long-term vendor management strategy.

4. Risks in Our Operations & Supply Chain

4.1. Modern Slavery Risks within Nors GW Operations

Nors Construction Equipment Canada GW Ltd. (Nors GW) operates exclusively within Canada, where the national risk of modern slavery is broadly considered low. However, we acknowledge that no jurisdiction is immune to the risks of forced labour, child labour, or exploitative practices, particularly among vulnerable or marginalized populations. As such, we remain vigilant and proactive in assessing and mitigating these risks across our business.

We recognize that certain groups may be more vulnerable to exploitation, including:

- Domestic and foreign migrant workers
- Contract, agency, or temporary workers
- Refugees, asylum seekers, and displaced persons
- Ethnic or religious minorities
- Young or student workers

Nors GW is committed to upholding the highest standards of human rights, both within our operations and among the people we employ or engage. We maintain a strong internal policy framework that is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), as well as applicable Canadian human rights and labour legislation. These policies are embedded across functions and reinforced through training, leadership oversight, and ethical decision-making.

In 2024, we conducted an updated internal risk assessment of our operations and confirmed that the risk of modern slavery remains low. This assessment considered the following factors:

- All business operations and labour resources are based in Canada

- Employees are hired directly and governed under regulated employment frameworks
- Operations are subject to robust federal and provincial oversight
- There is no reliance on outsourced labour in high-risk jurisdictions

While our internal risk remains low, we recognize the importance of continuous vigilance, particularly as we expand operations into new provinces and engage with a growing range of third-party contractors, service providers, and logistics partners.

4.2. Modern Slavery Risks within Our Supply Chain

As part of our second year of reporting under the Fighting Against Forced and Child Labour in Supply Chains Act, Nors Construction Equipment Canada GW Ltd. (Nors GW) has continued to advance and strengthen our vendor due diligence processes. Building on the initial groundwork laid in 2023, we undertook a more structured and comprehensive review of our active vendors for the 2024 fiscal year, identifying 474 Vendors across our supply chain.

Our ongoing risk assessment efforts are designed to evaluate the likelihood of modern slavery exposure across our vendor base by analyzing:

- 1. Country of Operation:** Each vendor is assigned a jurisdictional risk score using the Global Slavery Index, which ranks countries based on the prevalence of modern slavery and enforcement of labour rights.
- 2. Industry and Sourcing Risk:** We further reviewed each vendor's connection to high-risk industries and commodities, referencing the U.S. Department of Labor's List of Goods Produced by Child Labour or Forced Labour, with particular attention to global manufacturing, resource extraction, and logistics networks.

The results of the 2023 analysis showed that:

- 86% of vendors are based in Canada
- 9% operate in the United States
- 5% are located in other international jurisdictions

Vendors operating in Canada and the U.S. are generally classified as low risk, based on the strength of labour laws, enforcement mechanisms, and regulatory oversight in those jurisdictions. However, we acknowledge that jurisdiction alone is not a complete risk indicator, and we remain aware of the possibility of indirect risk through subcontracting or the use of third-party labour.

In 2024, we built upon our prior assessment by initiating more in-depth engagement with vendors, improving onboarding screening, and incorporating additional policy disclosures and ethical criteria into our vendor approval process.

Additionally, our largest supply partners, including Volvo and other globally recognized Original Equipment Manufacturers (OEMs), are found to have robust internal frameworks in place to address forced and child labour. These partners maintain modern slavery statements, codes of conduct, and due diligence programs aligned with international best practices, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Their leadership in this area helps to reinforce our broader efforts and adds a layer of confidence in the integrity of our upstream supply chain.

Continued Progress: Risk Segmentation and Tiering

To further mature our program, we have begun developing a tiered vendor segmentation model to better understand risk across different levels of our supply chain. This approach will allow us to:

- Focus enhanced due diligence on Tier 1 suppliers who provide mission-critical goods and services
- Begin to trace and evaluate Tier 2 suppliers, particularly in high-risk sectors or geographies
- Allocate resources efficiently toward the highest areas of potential exposure
- Build a foundation for long-term risk-based engagement and remediation strategies

This tiering initiative marks an evolution in our modern slavery risk management approach and will be integrated into a broader Vendor Risk Management Program that continues to grow year over year.

5. Assessing Effectiveness

As part of our ongoing commitment to transparency and continuous improvement, Nors Construction Equipment Canada GW Ltd. (Nors GW) has taken further steps in 2024 to strengthen how we measure the effectiveness of our efforts to address modern slavery risks within our operations and supply chain. Building on the foundational goals set in our 2023 report, this year we have begun establishing baseline metrics, formalizing internal tracking mechanisms, and refining performance indicators to support long-term program development.

While our metrics program remains in early stages, key areas of progress include:

Vendor Compliance Monitoring | In 2024, Nors GW began formally tracking vendor alignment with our Supplier Code of Conduct, particularly among newly onboarded vendors. While supplier audits have not yet been implemented, we are now monitoring the rate of supplier policy disclosures and identifying gaps where remediation or engagement may be needed. This provides a preliminary benchmark for future compliance monitoring.

Training Participation | We initiated awareness-building efforts with key procurement personnel and relevant operational teams, and we began tracking participation in internal education efforts focused on identifying modern slavery risks. Expanding training coverage to more employee groups and eventually to suppliers remains a target for 2025.

Supplier Risk Assessment | As part of our updated risk assessment process, we evaluated 474 vendors based on geography, sector, and sourcing practices. This allowed us to establish a risk distribution baseline and identify overseas vendors or indirect sourcing channels that may require closer scrutiny moving forward.

Supply Chain Transparency | Through our multi-tier supply chain mapping initiative, we have improved visibility into Tier 1 suppliers and have begun preliminary engagement with key suppliers to explore traceability and ethical sourcing practices. While full traceability of raw materials remains a long-term objective, progress made in 2024 has expanded our internal understanding of upstream risks.

In 2025, Nors GW aims to build on these early metrics by:

- Establishing key performance indicators (KPIs) for compliance, training, and engagement.
- Introducing a basic supplier self-assessment tool to collect data directly from vendors.
- Expanding internal modern slavery training participation across additional departments.

- Enhancing our ability to track remediation actions related to non-compliance or risk concerns.

These improvements will help us better evaluate the impact of our program and guide future decision-making. As we evolve our approach, Nors GW remains committed to strengthening accountability, improving transparency, and safeguarding human rights throughout our supply chain.

6. Conclusion

As we conclude our second year of reporting under the Fighting Against Forced Labour and Child Labour in Supply Chains Act, Nors Construction Equipment Canada GW Ltd. (Nors GW) reaffirms its commitment to ethical business practices, human rights, and continuous improvement in combating modern slavery.

In 2024, we expanded on the foundational work initiated in 2023 by enhancing our due diligence processes, strengthening supplier onboarding, improving internal awareness, and advancing our risk assessment capabilities. These efforts mark tangible progress in our journey toward a more transparent, accountable, and responsible supply chain.

We recognize that modern slavery is a complex and evolving issue that requires ongoing vigilance, collaboration, and adaptation. While our internal risk remains low, we acknowledge the need for deeper engagement with our supplier base, greater supply chain transparency, and more robust tracking of effectiveness across all areas of our program.

Looking ahead, Nors GW is committed to further strengthening our approach by continuing to:

- Refine and apply risk-based vendor management strategies
- Expand supplier engagement and traceability efforts
- Strengthen employee training and accountability
- Improve metrics to assess the impact of our initiatives

We understand that ethical supply chain management is not a one-time project, but a sustained responsibility. Through our policies, partnerships, and performance standards, we will continue to take proactive steps to safeguard the dignity, safety, and rights of all individuals connected to our business.

7. Concordance Table

To support clarity and ease of review, the table below outlines how the contents of this report correspond to the specific reporting requirements set out in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act. Each section is mapped to ensure transparency and demonstrate alignment with the Act’s obligations.

Concordance Table		
Requirement	Included	Section
Structure, activities, and supply chain information.	<input checked="" type="checkbox"/>	Operational Structure, Activities, & Supply Chain
Policies and due diligence processes in relation to forced and child labour.	<input checked="" type="checkbox"/>	Policies and Due Diligence Processes
Parts of the business and supply chains at risk, and the steps taken to assess/manage risk.	<input checked="" type="checkbox"/>	Risks in Operations and Supply Chain
Measures to remediate forced or child labour, and loss of income to vulnerable families.	<input checked="" type="checkbox"/>	Due Diligence Processes – Remediation Measures
Training provided to employees on forced / child labour.	<input checked="" type="checkbox"/>	Due Diligence Processes – Internal Awareness and Training. Assessing Effectiveness – Training Participation
How the organization assesses its effectiveness in ensuring forced / child labour is not used.	<input checked="" type="checkbox"/>	Assessing Effectiveness

8. Attestation & Approval

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I, in the capacity of Chief Executive Officer, attest that I have reviewed the information contained in this report on behalf of the governing body of 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 within this report.

Colin Matejka

Chief Executive Officer | Nors Construction Equipment Canada GW Ltd.

May 13, 2025



I have the authority to bind Nors Construction Equipment Canada GW Ltd.



NORS

Making it work.