

Canadian Statement Against Forced Labour and Child Labour in Supply Chains pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, referred to as Canada's "Modern Slavery Act" (the "Act") for the year ending September 30, 2024.

1.0 INTRODUCTION

This is a statement made by S3 Group Ltd. in respect of the Act, as referenced above.

2.0 REPORTING ENTITY

This statement is being filed with respect to the activities of S3 Group Ltd.

S3 Group Ltd. is a private company incorporated under the *Business Corporations Act* in the province of Alberta.

3.0 STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Although its subsidiaries are not part of the reporting requirements of the Act, S3 Group Ltd. ("S3") has wholly owned subsidiaries in the United States (S3 Delta Harrows Inc., S3 Property Management Inc.).

Headquartered in Swift Current, Saskatchewan and approaching its 59th year in agricultural manufacturing, S3 operates seven facilities in five locations in Canada and the US. These locations are in Swift Current, Saskatchewan; Fort Qu'Appelle, Saskatchewan; Medicine Hat, Alberta; Mitchell, Ontario; and Shenandoah, Iowa, US. S3 employs approximately 165 employees in Canada and over 10 employees in the US.

With a focus on products and innovation that contribute to responsible and sustainable farming practices, S3 provides engineering and manufacturing solutions to some of the world's most recognized brands in agricultural equipment. In addition, S3 has also developed a growing portfolio of patented S3-branded products across several product categories such as grain aeration fans, pneumatic systems for air seeders, combine airbars, tynes, complex wire forming, hitches, and harrows.

S3 has a long history of providing sole-sourced manufacturing solutions to some of the world's most recognized OEMs in agricultural equipment. It also sells a significant and growing amount of branded products through an established distribution network. With the informal motto of "everyday better than the last," S3 takes its corporate values of Integrity, Character, Honour, and Joy seriously. Its commitment to agricultural stewardship, community involvement, and approach to diversity underscores a commitment to long-term continuous improvement and sustainability.

S3 procures raw materials, parts, and components and has an array of suppliers of goods and services as part of its supply chain. The vast majority of its top suppliers originate in Canada and secondly from the United States. S3 also procures parts and materials from elsewhere including Germany, Korea, and China.

For more information about S3 Group Ltd., refer to its website: www.S3groupLtd.com

4.0 POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED AND CHILD LABOUR

For the fiscal period ending September 30, 2024, S3 had gathered information on its worker recruitment and has an International Employees Policy as part of its internal employment policies. S3 is committed to promoting a workplace that is welcoming and inclusive for the recruitment and employment of international employees. This includes providing a workplace that is free from physical, mental, sexual, or financial abuse. International employees are free to secure immigration services with a service provider of their choosing. As part of this International Employee Policy, S3 will comply with federal and provincial legislation and will ensure that S3 provides clear and accurate information in relation to that employment.

5.0 PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

In 2024 (and 2025), S3 continues to actively update and add to its policies and procedures. Work has started to consider steps which S3 can take towards identifying and preventing the risk of forced labour and child labour that may arise in the supply chain.

6.0 MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

To its knowledge, S3 has not identified any instances of forced labour or child labour in its supply chains, and as such, no remediation measures were required for the fiscal year that ended on September 30, 2024.

7.0 MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

As noted in 6.0, S3 has not identified any instances of forced labour or child labour in its supply chains, and as such, it has not taken any associated measures to remediate loss of income to most vulnerable families that result from measures taken to eliminate the use of forced labour or child labour.

8.0 TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

At S3, employees take part in orientation training and ongoing training during their employment. As policies and procedures are updated or developed, the training programs are reviewed and updated accordingly. Given that S3 continuously improves its policies and procedures based on changes in operations, standards improvements, and legislation, it is anticipated that training will be provided to employees on forced labour and child labour as relevant changes are made internally to S3's policies and procedures.

9.0 HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

At S3, governance forms a vital aspect of its sustainable growth and development. S3 benefits from an engaged board of directors and strong executive management team. With regular reporting and use of metrics and KPI's, the S3 executive team fosters continued, sustainable and accountable development.

S3 regularly reviews its environmental, social and governance (ESG) performance to identify new areas for development and growth. While S3 does not currently have formal measures in place to assess its effectiveness in ensuring that forced labour and child labour is not being used in its business and supply chains, S3 does have a core value system of Integrity, Character, Honour and Joy and a Code of Conduct Policy for its employees.



ATTESTATION

This report has been approved by the Board of Directors of S3 Group Ltd. on its own behalf.

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. For clarity, I am providing this attestation in my capacity as a director and officer of S3 Group Ltd., and not in my personal capacity.

Signature: 

Name: Richelle Andreas

Title: Director and President & CEO, S3 Group Ltd.

I have authority to bind S3 Group Ltd.

Date: May 30, 2025