



BILL S-211 FORCED LABOUR IN CANADIAN SUPPLY CHAINS REPORT

JULY 29, 2025

TMEIC CORPORATION AMERICAS
1325 Electric Road, Roanoke VA 24018 USA

compliance@tmeic.com

INDEX

Scope

Period Covered

Supply Chain Risk Assessment Summary

Formal Policy on Modern Slavery

Supply Chain Mapping

Sectors of Industry

Addendum

- TMEIC Group Human Rights Policy

- Supplier Code of Conduct

- Country of Origins list of supplied materials

Signed Statement of Attestation

Scope of this Joint Report:

TMEIC Corporation Americas, a Delaware corporation: FEIN: 31-1723263 and subsidiary TMEIC Canada Corporation, a British Columbia extra-provincial company Business No.: 892217514BC0002 meeting the entity requirements of doing business in Canada, generating at least \$40mil in revenue and employing on average at least 250 people for at least one of its two most recent financial years.

Period Covered by the Report:

Fiscal year beginning April 1, 2024, and ending 31 March 2025

Supply Chain Risk Assessment

TMEIC Corporation Americas have controls and procedures in place to identify, investigate and remedy the risk of any child and forced labor in our operations and supply chains. We conduct yearly supplier risk assessments based on country of origin of supplied goods, as well as requiring all suppliers to acknowledge and adhere to our supplier code of conduct, which includes human rights and forced labor and human trafficking concerns, as well as remedial efforts should a supplier be found non-compliant.

Formal Policy on Modern Slavery

The TMEIC Group Human Rights Policy is distributed to all employees with acknowledge, read and receipt through our internal training system. The TMEIC Corporation Americas Integrity Commitment, is distributed to all employees, contractors, authorized representatives, and agents of TMEIC Corporation Americas and its subsidiary companies, includes instructions for compliance with law and policies and the duty to report as well as how to report violations of the law.

Supply Chain Mapping and Human Rights Assessment

TMEIC Corporation Americas partners with a 3rd party supplier for supply chain mapping for all suppliers and those of its subsidiary companies. Evaluation of supply chain locations, policies, and practices to fulfill requirements of global human rights regulations, including AU and UK Modern Slavery Act, Prevention of Human Trafficking Acts, Uyghur Forced Labor Prevention Act and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

To date, TMEIC Corporation Americas has found that we contain some risk based solely on country of origin. We have not yet uncovered Tier 2 or Tier 3 suppliers for those at-risk Tier 1 suppliers, however, per company policy, we will work with those suppliers to mitigate any issues should they be found.

Sectors of Industry

TMEIC Corporation Americas is active in the following industries:

- Construction: Cement
- Mining
- Transportation: Port Solutions/Crane Systems
- Utilities: Utility Plant Systems, Renewable Energy, Water & Wastewater, Oil & Gas
- Manufacturing: Metals, Paper, Rubber & Plastics

TMEIC Group Human Rights Policy (“Policy”)

The TMEIC Group’s corporate philosophy is to build relationships of trust with customers and contribute to the sustainable development of global society as an industrial systems integrator.

The TMEIC Group respects human rights as a social responsibility expected of a corporation in developing its business activities to realize its corporate philosophy. It promotes initiatives to respect the human rights of all stakeholders, including its employees.

1. Based on this Policy, the TMEIC Group respects human rights as defined by the International Bill of Human Rights and the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. It hereby reaffirms its commitment to conducting its business activities in a way that respect human rights, including, but not limited to, eliminating discrimination, prohibiting child and forced labor, complying with labor-related laws and regulations, and maintaining a safe and healthy work environment. The TMEIC Group also incorporates initiatives to respect human rights into its business activities in accordance with the United Nations Guiding Principles on Business and Human Rights.
2. The TMEIC Group complies with the laws and regulations of the countries and regions in which it operates. In the unlikely event of a conflict between international norms on human rights and the laws and regulations of the countries and regions in which it operates, the TMEIC Group will take the approach that adheres to international norms on human rights.
3. The TMEIC Group is committed to ensuring that all its officers and employees respect human rights in accordance with this Policy. It also requires its suppliers and business partners to respect human rights.
4. The TMEIC Group conducts human rights due diligence to identify negative impacts on human rights that may occur in its business activities and works to prevent or mitigate such negative impacts. In addition, through the operation of internal and external reporting channels, the TMEIC Group promptly identifies risks that may cause or contribute to negative impacts on human rights in its business activities and strives to take appropriate remedial measures if any of these risks are actualized.
5. The TMEIC Group engages in dialogue with relevant stakeholders on human rights issues, deepens its efforts to respect human rights, and revises this Policy as needed.
6. The TMEIC Group conducts appropriate educational activities to ensure that all of its officers and employees understand this Policy and implement it in their respective business activities.
7. The TMEIC Group appropriately discloses information on the status of its activities to adhere to human rights.

Established: February 27, 2023

TMEIC Corporation Americas Supplier Code of Conduct

TMEIC Corporation Americas (together with its subsidiaries, "TMEIC"), has a long history of conducting its businesses in an ethical, legal and socially responsible manner. TMEIC expects each contractor and supplier (each, a "Supplier" and collectively, "Suppliers") to comply with the following code of conduct (this "Code"). The principles and values expressed by this Code reflect TMEIC's expectations and guidelines with respect to responsible sourcing. By its acceptance of any purchase order from TMEIC, each Supplier acknowledges its acceptance of this Code and intention to comply with the spirit of its requirements.

1. **HUMAN AND LABOR RIGHTS**. Suppliers are expected to respect and comply with the fundamental rights granted to all employees under applicable laws. Furthermore, we expect our Suppliers to fully recognize the labor standards issued by the International Labor Organization ("ILO"), taking into account the applicable laws and regulations in different countries and at different sites. At TMEIC, we expect Suppliers to respect third persons' rights and minimize any possible adverse effects by considering all relevant international standards and treating all people with dignity. Suppliers should especially be aware of and respect the rights of indigenous people, vulnerable groups, including, but not limited to, migrant workers, women, children, and disabled people, as well as local communities in connection with the Supplier's activities and operations.

1.1. **Child Labor**. TMEIC does not tolerate any form of child labor. We are committed to the elimination of the "worst forms of child labor," as defined by ILO Convention 138 & 182. TMEIC expects our Suppliers to prevent child labor in their operations and encourages our Suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

1.1.1. No individuals are hired under 15 years of age, or 14 years of age where local law allows, and such exception is consistent with ILO Convention No. 138 & 182, or under the legal minimum age for employment in the country, whichever is greatest.

1.1.2. Any employment of workers under the age of 18 does not interfere with schooling or vocational education or expose children to risks that can harm physical, mental or emotional development.

1.2. **Non-Discrimination**. Suppliers are prohibited from engaging in any form of discrimination based on race, color, religion, gender/sex, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, citizenship, status as a covered veteran, pregnancy, childbirth, or related medical conditions including lactation, or any other protected status in accordance with applicable federal, state and local laws, with respect to recruitment, hiring, training, promotion, and other terms and conditions of employment.

1.3. **Forced Labor and Human Trafficking**. TMEIC does not tolerate any form of abusive or illegal labor in our supply chain such as forced labor or human trafficking. TMEIC requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited, including, but not limited to, any form of prison, slave, bonded or forced indentured labor.

1.4. Freedom of Association. Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, reprisal, or retaliation. We expect our Suppliers to respect the rights of their employees to the full extent of applicable federal, state or local law.

1.5. Working Time and Compensation. Suppliers are expected to fully comply with applicable federal, state or local laws relating to wage and hour.

1.6. Conflict Minerals. Suppliers are expected to adhere to all applicable conflict minerals regulations. If a product contains one or more of the so-called “conflict minerals” (e.g., tin, tantalum, tungsten, gold, etc. or their ores) we expect our Suppliers to provide, on request, transparency on the supply chain up to the smelter.

2. OCCUPATIONAL HEALTH AND SAFETY. Suppliers are expected to fully comply with applicable federal, state, or local laws and regulations relating to health and safety. Furthermore, Suppliers are expected to establish and maintain an appropriate occupational health and safety management system and train their employees for the purpose of preventing accidents and occupational diseases to the greatest extent possible.

3. ENVIRONMENTAL PROTECTION. To create products harmonized with the environment, TMEIC selects low environmental burden materials (i.e., engages in green procurement) and promotes procurement activities in due consideration for the environment. Suppliers are expected to comply with all federal, state, or local laws relating to the environment. Suppliers are expected to establish and maintain an environmental management system to minimize environmental impact and hazards and to improve environmental protection in their everyday operations.

4. TRADE COMPLIANCE AND SUPPLY CHAIN SECURITY.

4.1. Trade Compliance.

4.1.1. Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import and export of parts, components, and technical data. Suppliers shall provide truthful and accurate information and obtain licenses and/or consents where necessary.

4.1.2. Suppliers agree to follow all applicable United States export control laws and will not export to sanctioned countries or any party on an export control or denied party list. Each Supplier will ensure that any goods received, as provided for in any purchase order with TMEIC, will not be re-exported or diverted to any sanctioned countries or any party on an export control or denied party list.

4.1.3. Suppliers shall be able to disclose the country of origin for the primary materials for all deliveries made. TMEIC reserves the right to ask Suppliers for a full supply chain map in order to facilitate risk assessment and gauge compliance in the upstream supply chain.

4.2. Supply Chain Security.

4.2.1. Suppliers must take reasonable measures to ensure the security of their supply chain to prevent it from being used to support activities that support terrorism, weapons and nuclear proliferation, smuggling, and human trafficking. We strongly recommend that its sub-suppliers enroll in an applicable supply chain security program such as CTPAT or AEO.

4.2.2. Suppliers are expected to implement a due diligence process to monitor their supply chain and promote responsible business conduct. This includes, but is not limited to, application of self-evaluating questionnaires, auditing, collecting available business and financial information, quality, and pertinent performance reports from sub-suppliers. Suppliers must map and evaluate their supply chain to identify constraints, risks, and disruptions. In the event of supply chain constraints, risks, and disruptions, TMEIC must be notified immediately as to the nature of the risk and the measures being taken to overcome it.

5. **CONDUCT IN BUSINESS ENVIRONMENT.** Suppliers are expected to conduct business in an ethical, respectful, and professional manor. Suppliers must hold themselves and their representatives to a high standard of integrity and comply with all applicable laws and regulations.

5.1. Prohibition of Corruption and Bribery. Suppliers are expected to have zero-tolerance for corruption and ensure compliance with all United Nations and Organisation for Economic Cooperation and Development conventions against corruption, and with all governing anti-corruption laws. Suppliers are expected to ensure that their employees, subcontractors, and agents do not offer, promise, or grant any advantages to any TMEIC employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

5.2. Invitations and Gifts. Suppliers are expected to refrain from presenting any invitations or gifts to TMEIC's employees to gain any form of influence. Any invitations or gifts extended to TMEIC's employees or related parties, if any, must be reasonable and suitable within scope and design (i.e., they must be of low financial value and reflect ordinary local business customs). We also expect our Suppliers to refrain from asking TMEIC employees or related parties for any inappropriate advantages.

5.3. Preventing Conflicts of Interest. Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers are expected to provide notification to all affected parties if an actual or potential conflict of interest arises. This includes a conflict between the interests of TMEIC and personal interests of Supplier or those of its close relatives, friends, or associates.

5.4. Money Laundering. Suppliers are expected to comply with all applicable laws and regulations applicable to money laundering and shall not participate in any money laundering activities.

5.5. Confidential/Proprietary Information. Suppliers shall responsibly manage sensitive information, including, but not limited to, confidential, proprietary, and personally identifiable information. Such information should not be used for any purpose other than the business purpose for which it was provided and then only to the extent and for the period necessary.

5.6. Intellectual Property. Suppliers must respect intellectual property rights and only utilize and transfer intellectual property rights in a manner consistent with federal, state or local laws.

5.7. Information Security. Suppliers must protect the confidential and proprietary information of others, including, without limitation, personal information from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Suppliers must comply with applicable federal, state or local data privacy laws and regulations.

6. **OTHER AGREEMENTS AND COMPLIANCE WITH THE CODE.**

6.1. This Code is a general statement of TMEIC’s expectations with respect to Suppliers. This Code should not be read in lieu of but in addition to any Supplier obligations as set forth in any agreements by and between TMEIC and the Supplier. In the event of a conflict between this Code and any applicable agreement, the terms of the applicable agreement shall control.

6.2. We expect our Suppliers and business collaborators to communicate these expectations throughout their supply chain by adopting efficient management systems, policies, procedures and training to uphold the standards and expectations set forth in this Code within their own business operations. Suppliers must maintain documentation reasonably necessary to evidence compliance with this Code. Such documentation must be made available to TMEIC upon reasonable advance written request. TMEIC or its representatives may engage in monitoring activities to confirm Supplier’s compliance to this Code, including, without limitation, on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess each Supplier’s performance. Failure to comply with this Code may subject a Supplier to possible termination of its business relationship with TMEIC.

TMEIC:
TMEIC Corporation Americas

By: 

Name: Chris Eakin

Title: Logistics and Procurement Director

SELLER:
Company: _____

By: _____

Name: _____

Title: _____

Country of Origin of Good Supplied into Canada

Countries are listed in order from greatest to least:

Japan.....	568 Units
United States.....	130 Units
Germany.....	15 Units
Canada	8 Units
Taiwan	6 Units
China.....	6 Units
Austria	5 Units
Jersey (British Dependency)	4 Units
India	4 Units
Netherlands.....	3 Units
Mexico.....	1 Units
France.....	1 Units

Statement of Attestation

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.



I have the authority to bind TMEIC Corporation Americas

Zachary Jungers
General Counsel & Secretary

July 29, 2025