

# CHILD SLAVERY AND FORCED LABOUR REPORT 2024

This Modern Slavery Report (the “**Report**”) addresses the period from January 1, 2024 to December 31, 2024 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)* (the “**Act**”). This Report is made on behalf of Techmation Electric & Controls Ltd. (“**Techmation**” or the “**Company**”).

## 1. INTRODUCTION

Child Slavery and Forced Labour, each as defined in the Act, are crimes and serious violations of human rights. As a Canadian industrial electrical and instrumentation service company, Techmation recognizes the important role that we have in ensuring that our operations (which are predominately in Northeast British Columbia, Alberta and Saskatchewan) and the supply chains that support our operations, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during fiscal 2024 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by Techmation or of goods imported into Canada by Techmation or third parties supplying Techmation.

## 2. OUR BUSINESS

Techmation is an industrial electrical and instrumentation contracting company headquartered in Airdrie, Alberta. We are one of "Canada's Best Managed Companies" providing a complete range of electrical and instrumentation services to all facets of the commercial and energy sectors. Techmation is recognized as "Best in Class" and our strength comes from partnering with our clients and focusing on their needs. This approach enables us to meet our customers' expectations with regards to project execution, scheduling, budgets and safety.

We have grown to become one of the largest independent electrical & instrumentation service providers within the Western Canadian Sedimentary Basin. Electrical and instrumentation maintenance, plant turnarounds and preventive maintenance scheduling are a few areas in which Techmation excels.

Our construction services range from major facility construction to plant expansions and upgrades. We are involved in every phase of the projects we execute to ensure the smooth transition from construction to final commissioning. With our industrial experience and full scope of services, we are able to meet the specific needs of each project and client.

To perform our work, we procure goods and services from various suppliers. The suppliers we engage include businesses that are primarily local and adhere to regulations in Canada for CSA approved products for the electrical and instrumentation industry, which are among the highest standards in the world.

Additional information relating to Techmation is available on our website at [www.techmationelectric.com](http://www.techmationelectric.com). For further details on Techmation's commitment to the environment and the communities in which we live and work, you can also request a copy of our 2024 ESG Report.

### 3. OUR POLICIES

#### **Policies**

Through our organizational and governance policies, we communicate our values and expectations, setting a high standard within our business but also for our supply chain. We are clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations or by suppliers working with us. We make every effort, including through carrying out due diligence to monitor the performance of our suppliers, to prevent our activities having a negative impact on human rights. Our relevant policies are discussed in further detail below:

#### ***Code of Business Conduct and Ethics***

We are committed to conducting our business in a lawful and ethical manner. Our Code of Business Conduct and Ethics is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Techmation employees should always act lawfully, ethically and in the best interests of Techmation.

#### ***Supplier Code of Conduct***

Techmation's Supplier Code of Conduct details the requirements and expectations we have of our suppliers, their supply chains, and other service providers with whom we engage. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Code of Conduct in their own operations and supply chain. Our Supplier Code of Conduct also sets forth our principles of inclusivity and accountability. We engage with suppliers that are committed to these same principles and suppliers commit to these standards as a condition of doing business with Techmation. We review our Supplier Code of Conduct upon supplier onboarding and on an annual basis to ensure that this policy is in-line with current best practices.

#### ***Whistle Blower Policy***

Techmation's Whistleblower Policy provides a mechanism for employees to report concerns regarding wrongdoing without fear of victimization, subsequent discrimination or disadvantage. The Whistle Blower Policy is intended to encourage and enable employees to raise serious concerns within Techmation rather than overlooking a problem or seeking a resolution for the problem outside Techmation. The Whistle Blower Policy applies to all employees and those contractors working for Techmation. It is also intended to provide a method for other stakeholders (suppliers, customers, shareholders etc.) to voice their concerns regarding Techmation's business conduct.

#### **Due Diligence**

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

We acknowledge that employees working in our supply chain are at potential risk of forced labour or child labour. In order to mitigate this risk, we follow a due diligence approach that includes the following steps:

- Monitoring and reviewing supply chains and business relationships,
- Collecting supplier and service provider attestation,
- Embedding responsible business conduct (EBC) into policies and management systems,

- Identifying and assessing adverse impacts in operations,
- Ceasing, preventing or mitigating adverse impacts, by training and raising awareness and understanding of modern slavery and human trafficking among our employees and vendors as we track implementation and results, communicating how impacts are addressed and providing for or cooperating in remediation when appropriate.

## 4. ASSESSING OUR RISK

Techmation engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, we engage with our peers, consult with external experts, map supply chains, conduct risk assessments, during our procurement process and annual review. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Reliance on low skilled workforce,
- Dangerous or undesirable work,
- Presence of migrant workers,
- Presence of labour intermediaries,
- Offshore production and sourcing of materials,
- Long, complex, or non-transparent supply chains,
- Presence of child labour,
- Jurisdictional risks including poverty, conflict, and enforcement of international human rights standards.

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as protective equipment, clothing and materials/parts sourced in whole or in part through foreign third parties.

## 5. OUR COMMITMENTS

Techmation is committed to upholding the highest standards of ethical conduct, including the prevention of modern slavery and human trafficking in all aspects of our operations.

As a private Canadian company, we recognize our responsibility to ensure that forced labor or child labor is not used at any step of the production of goods, whether within Canada or abroad, by our entity or within our supply chains. Below outlines the steps we have taken to address and mitigate these risks:

- Mapping our supply chains,
- Monitoring suppliers,
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily,
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains,
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour, and
- Encourage employees and stakeholders to report any concerns or suspicions of modern slavery.

### **Remediation Measures**

In accordance with the Act, Techmation has conducted a comprehensive assessment of its activities and supply chain and has not identified any incident of forced labour or child labour being used. Therefore, we did not need to take any measures to remediate an incident of forced labour or child labour.

Techmation acknowledges the importance of vigilance and ongoing monitoring to ensure that modern slavery risks remain mitigated within our operations and supply chains. We are committed to regularly reviewing our risk assessments and implementing any necessary remediation measures should the need arise in the future.

Our Code of Business Conduct and Ethics and our Whistleblower Policy require all employees and contract workers of Techmation to report actual or possible misconduct. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labour and child labour is mitigated in our business. In the event that we discover any forced labour or child labour in our business and supply chains, we may take one or more of the following measures to remediate such forced labour or child labour:

- Actions to support victims of forced labour or child labour and/or their families such as workforce reintegration and psychosocial support,
- Compensation for victims of forced labour or child labour and/or their families,
- Actions to prevent forced labour or child labour and associated harms from reoccurring,
- Grievance mechanisms; and
- Formal apologies.

### **Training**

Techmation personnel at all levels are required to adhere to our Code of Business Conduct and Ethics policies and ensure that it is understood and properly applied to their daily activities. Every new employee of Techmation must review and sign our mandatory values and policies included in our Code of Business Conduct and Ethics and is informed of how to report wrongdoing under our Whistle Blower Policy. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

### **Supplier Engagement**

We engage with our suppliers to raise awareness of modern slavery risks and provide guidance on implementing best practices for prevention and mitigation. Our Supplier Questionnaire is mandatory to be completed with all of our major and/or high-risk suppliers.

## **6. OUR PROGRESS AND EFFECTIVENESS**

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date, no significant concerns or complaints have been identified.

We have selected certain key performance indicators (KPIs) with respect to human rights, including forced labour and child labour, and such KPIs are reviewed by Techmation's senior leadership team on an annual basis. Any non-conformances identified are dealt with by the appropriate teams. Support is provided to suppliers where necessary to resolve any issues raised.

We also assess the effectiveness of our policies by:

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour,

- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and child labour clauses,
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators.

## 7. ATTESTATION

This Report was approved by Techmation's Board of Directors on May 21<sup>st</sup>, 2025 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our website at [www.techmationelectric.com](http://www.techmationelectric.com).

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in this Report for 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 above.



Derek Polsfut President and CEO

May 21<sup>st</sup>, 2025

I have the authority to bind Techmation Electric & Controls Ltd.