

Toromont Industries Ltd.

# Modern Slavery Report 2024

**TOROMONT**

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## TOROMONT MODERN SLAVERY REPORT

Toromont supports and respects internationally recognized human rights throughout its operations as demonstrated in its human resource policies, commitment to employee health and safety and expectations of both employees and suppliers as further described in our [Human Rights Statement](#), [Code of Conduct](#) and [Supplier Code of Conduct](#). Toromont's [Human Rights Statement](#) is guided by internationally accepted principles including, without limitation, the principles of the UN Global Compact.

This Modern Slavery Report (the "**Report**") is intended to meet the requirements of *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"), for the 2025 reporting period and is made for the purposes of the Act by Toromont Industries Ltd. on its own behalf and for each Reporting Entity it owns or controls (collectively, "**Toromont**") as defined in the Act.

## **OUR CORPORATE STRUCTURE & OPERATIONS, GOVERNANCE AND SUPPLY CHAIN**

### **Corporate Structure & Operations**

#### **Reporting Entities**

Toromont Industries Ltd., including the following operating divisions: Toromont Cat, Battlefield Equipment Rentals, Toromont Material Handling and CIMCO Refrigeration and its wholly owned subsidiaries:

Toromont Energy Ltd.

SITECH Eastern Canada Ltd.

CIMCO Refrigeration Inc.

#### **Toromont Industries Ltd.**

Toromont Industries Ltd. (**TSX:TIH**) is a Canadian company which operates through two business segments: The Equipment Group and CIMCO.

#### ***The Equipment Group***

The Equipment Group includes one of the world's larger Caterpillar Inc. ("**Caterpillar**") dealerships by revenue and geographic territory, in addition to industry-leading rental operations and material handling business. It is comprised of the following operating divisions: Toromont Cat, Battlefield Equipment Rentals and Toromont Material Handling.

**Toromont Cat** has a network of branches in Ontario, Quebec, Manitoba, Newfoundland & Labrador, Nova Scotia, New Brunswick, Prince Edward Island and most of Nunavut (the "**Territory**"), providing a broad range of equipment supply and customer service capabilities. The Caterpillar dealership represents a broad range of Caterpillar products including, earthmoving and construction equipment, paving machines, mining equipment, industrial and marine applications, lift trucks and power generation. In addition to the sales and service of equipment, operations include the distribution of replacement parts for Caterpillar products and other equipment lines, and the remanufacture and repair of engines and engine components. The Toromont Cat dealership also represents products from other manufacturers in equipment lines not served by Caterpillar.

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**Battlefield Equipment Rentals** (“**Battlefield**”) is a single-source supplier of rental equipment, specialty tools, building products, safety supplies and safety training programs for construction contractors, tradespeople, plant maintenance contractors and homeowners in our Territory. Battlefield sells brand name products and is the authorized distributor for such brands as Spectra Precision / Trimble, Wacker Neuson, Stihl, Honda, SkyJack, Genie, Husqvarna, Atlas Copco, Bosch and Gorman-Rupp. Battlefield also operates SITECH Eastern Canada Ltd., which sells and services Trimble GPS machine control and guidance systems, laser survey equipment and provides professional services to the earthmoving and mining segments. Additionally, Battlefield operates Jobsite Industrial Rental Services, which provides equipment for the plant maintenance, factory and industrial industries, focusing on the electrical, mechanical, welding, millwrighting and rigging trades.

**Toromont Material Handling** is a dealer of material handling equipment in Saskatchewan, Manitoba, Ontario and Quebec, providing products from a number of large lift truck and battery manufacturers (including Logisnext, Kalmar and Hoppecke) targeted to a range of industries including paper product manufacturers, ports and terminals, railways, automotive parts and components manufacturers, food and beverage makers, third party logistics and home and hardware retailers.

**Toromont Energy Ltd.** develops distributed energy projects and provides solutions for emerging renewable energy in the healthcare, agricultural, mining and manufacturing sectors. Its core business is the design, construction, operation and maintenance of all energy assets. In addition to providing a range of services for power generation projects, Toromont Energy, on a selective basis, participates in project ownership. Toromont Energy operates plants throughout Ontario that supply energy to hospitals, district energy systems and landfill gas to energy plants.

## *CIMCO*

CIMCO Refrigeration is a North American supplier of industrial grade thermal management solutions for the monitoring and control of environments utilizing natural refrigerants, helping reduce energy consumption and emissions. It provides full-service capabilities including design, engineering, manufacture, installation and after-market service. Markets served include food and beverage, cold storage, skating, ground freezing and District Heating and Cooling.

## **Governance**

Toromont’s Environmental, Social and Governance Committee (“**ESG Committee**”) and Human Resources and Health & Safety Committee (“**HRHS Committee**”) are standing committees of its Board of Directors, comprised of independent Directors. The ESG Committee is responsible for oversight of Toromont’s approach to social responsibility matters including human rights and modern slavery. It reviews and monitors relevant company policies, practices and procedures addressed in this Report, such as the Company’s [Code of Conduct](#), [Supplier Code of Conduct](#) and [Human Rights Statement](#). The HRHS Committee provides oversight of human rights and modern slavery matters as it relates to employment matters. Both Committees receive regular reports from management regarding the effectiveness of, and compliance with practices, policies and procedures responsive to modern slavery matters.

The ESG Committee, in collaboration with the HRHS Committee, reviews, approves and recommends approval of this Report by the full Board of Directors.

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## Supply Chain

Toromont's principal business offerings consist of internationally recognized, industry-leading high value capital goods with sophisticated engineering, product support and servicing of same. Toromont sells heavy equipment and associated components used in a variety of industries as previously described in this Report.

Toromont's primary supplier is Caterpillar, which is headquartered in the United States and has operations globally. Toromont is also a distributor for other manufactured goods from a variety of suppliers who are primarily North American or European based. These goods generally support or complement our existing Caterpillar product offerings. Toromont maintains direct relationships with its key manufacturers.

Relative to equipment and components sales, elements of Toromont's supply chain related to operations, product support and services represent a much smaller portion of our procurement and core business expenditures. These consist largely of facilities, fleet, product support and service supplies and professional services. We maintain facilities, vehicle fleets and procure supplies such as tooling, oils, lubricants and other consumables, office supplies, IT and communications equipment and software to facilitate operations. Toromont uses various professional services to assist in our operations such as accounting, legal, engineering, administration, fleet management and other consultants and sub-contractors to support serving our customers.

## **MODERN SLAVERY RISK IN OPERATIONS AND SUPPLY CHAIN**

Toromont operates primarily within Canada and, in the case of our CIMCO division, in the United States. Our core suppliers are predominantly North American or European based. Each of these jurisdictions have robust pre-existing labour, employment and human rights legislation that mitigates the risk of modern slavery in our operations and supply chain. This is enhanced by our own governance framework, as set out in this Report.

### **Modern Slavery Risk in Operations**

Toromont has established a comprehensive internal governance framework, including policies, practices and training programs for our daily operations to address ethical business conduct, the protection of human rights, health and safety, and the management and compensation of employees, all in accordance with applicable laws and our ethical standards.

#### *Policies & Practices:*

**Toromont's [Code of Conduct](#):** This is a central element of our governance framework and sets out:

- Employee behaviour and expectations;
- Our stance on universal human rights and labour practices, including those aimed at reducing and eliminating modern slavery in our operations and supply chain;
- Toromont's core set of values: 1) shared responsibility for a safe and respectful workplace; 2) social responsibility; and 3) integrity;
- *Speak up without fear*: employees are able to speak up without the fear or threat of reprisal and are encouraged to report any concerns they believe are inconsistent with the [Code of Conduct](#).

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**Health & Safety:** Our health and safety program is an integral part of maintaining a healthy and safe workplace for all employees and emphasizing our commitment to prevent any form of modern slavery within our operations. Relevant policies and practices integrated into our health and safety program include:

- Employer, supervisor and employee-specific health and safety policies;
- Internal portal and reporting system for employees to document hazards, near-misses, and incidents;
- Routine email communication to all employees respecting health and safety best practices;
- Violence, harassment, discrimination & bullying policies, and associated grievance handling mechanisms;
- Parental and sick leave policies; and
- Employee Assistance Program (EAP).

**Human Rights Statement:** We are committed to recognizing and valuing the inherent dignity and worth of every person, providing for equal rights and opportunities. Consistent with this commitment, we have adopted our [Human Rights Statement](#), which embodies our unique approach to respecting nationally, and internationally recognized Human Rights.

**Freedom of Association:** We respect and recognize the right of employees to collectively bargain.

## Hiring Policies:

- Job grading and salary reviews: we engage in salary benchmarking and assess existing pay and other entitlements to maintain compliance with applicable employment standards legislation and/or any applicable collective agreement(s);
- Transparent hiring practices: we provide applicants with adequate information respecting the nature of the work they undertake and their associated working conditions.

**Whistleblower Policy:** We are committed to upholding the highest standards of ethics in our relationships with customers, employees, suppliers, shareholders, regulators and the business communities we serve.

**Training:** Toromont has robust education and training programs to advance employee understanding of their rights and responsibilities in their respective roles and duties. We provide job-specific training, including at various levels of management to maintain compliance of our policy framework. This culture of learning and enablement assists Toromont in further building its capacity to detect risks of modern slavery in our operations and supply chain, and strengthens expectations, both internally amongst our employees and externally within our supply chain.

In particular, annual [Code of Conduct](#) training is mandatory for all Toromont employees. This training includes an acknowledgement by employees that they are aware of their responsibilities provided in the [Code of Conduct](#).

## Modern Slavery Risk in Supply Chain

Toromont's reputation for integrity and transparency in its practices and business dealings is crucial to earning and maintaining a relationship of confidence and trust with its stakeholders, including employees, customers, suppliers, shareholders and the communities it serves. Toromont expects its suppliers to embrace these values and to provide an undertaking consistent with the

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principles set out in our [Supplier Code of Conduct](#) which outlines Toromont's ethical business practice requirements, including that suppliers comply with all laws related to modern slavery.

## **Risk Assessment & Management**

Toromont reviews its operations and conducts an assessment of its supply base for modern slavery risks, including suppliers in areas that we consider to be higher risk. We assess and evaluate their scope and degree of due diligence as it relates to their own supply chain and reporting of modern slavery. We engage in reviews of their existing measures taken to identify and mitigate against the risk of modern slavery, including current policies designed to address modern slavery, health and safety, and compliance with employment and labour legislation as well as expectations of their own suppliers. Where appropriate, additional due diligence measures are undertaken, including the requirement for suppliers to complete a detailed questionnaire or respond to additional follow up questions. In the event that Toromont becomes aware of any actions or conditions within its supply chain that are not in compliance with our standards, Toromont's expectation is that the supplier implement corrective measures. A supplier's continued non-compliance may lead to additional remediation actions, up to and including termination of the business relationship.

In 2024, Toromont assessed its supply base enterprise-wide to identify core suppliers and evaluate their respective approach to modern slavery, including within their supply chain. We compiled data summarizing payments made to vendors using our accounts payable records and cash disbursement registers/systems. Based on the foregoing, Toromont identified and assessed its key suppliers of goods accounting for approximately 80% of its payments to suppliers of core goods, with Caterpillar representing a substantial majority of our supply. Caterpillar undertakes rigorous due diligence processes to assess and identify modern slavery risks in its supply chain and has published its own Modern Slavery Statement. Similarly, other key manufacturers set out in this Report have undertaken comparable measures to mitigate against their respective exposures to modern slavery.

## **Assessment of Effectiveness**

Based on our internal governance framework, policies, practices and foregoing methods of assessment, Toromont considers its actions with respect to modern slavery in its operations and supply chain to be effective.

## **Monitoring & Continuous Improvement**

We continue to monitor and conduct due diligence measures as appropriate to assist us in detecting any form of modern slavery in our operations and supply chain.

We are committed to reinforcing the expectations as set out in this Report, both internally and externally, and continue to explore ways in which we can enhance our efforts, including within our own policies, training requirements relative to employee position and responsibility and additional compliance monitoring of our suppliers.

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## **REPORTING MODERN SLAVERY CONCERNS**

Toromont encourages reporting by any party who has a good faith belief that entities or individuals covered under this Report have engaged in conduct that is inconsistent with the principles set forth herein.

Reporting may be completed on a confidential and anonymous basis by calling the **Toromont Compliance Hotline, 1-866-254-2730** or via **Secure Web Form** at [www.openboard.info/tih](http://www.openboard.info/tih). The hotline is operated by an independent organization.

## **CONCLUSION & APPROVAL**

Based on the foregoing and the actions described in this Report, **Toromont is not aware of any instances of modern slavery within its operations or supply chain, and believes the risk of modern slavery is low.**

The ESG Committee has oversight responsibilities for matters relating to the Act. In accordance with the Act, this report has been approved by Toromont's Board of Directors.

*"Richard Roy"*

Richard Roy  
Chair  
Board of Directors  
March 7, 2025

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