



FIGHTING MODERN SLAVERY

Joint Report Pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act

May 29, 2025

1. INTRODUCTION

Ramudden Global (North America) Inc. and its subsidiaries (collectively, “**Ramudden**”, “we”, “us”, or “our”) are committed to supporting and promoting the protection of human rights and stands against forced labour, child labour, human trafficking, and all forms of modern slavery. As a group of companies dedicated to road safety, we recognize the important role we play in protecting human rights, and we strive to avoid causing or contributing to harmful human rights impacts. We maintain a zero-tolerance policy for all forms of modern slavery and human trafficking within our organization, vendors and subcontractors.

This joint report is prepared in accordance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) and constitutes Ramudden Global (North America)’s annual report for a subset of its Canadian subsidiaries that meet the reporting criteria for the year ending on December 31, 2024. This includes Ramudden Global (Canada) Inc. (o/a Ramudden Canada), Powell (Richmond Hill) Contracting Limited (o/a Powell Contracting) and Pivot Safety Products Inc. This report covers actions taken by Ramudden during the reporting period to ensure that modern slavery is not taking place in its own operations, as well as in its supply chains.

We hold ourselves to the highest standards and expect our employees to act with honour and integrity at all times. We maintain an Employee Code of Conduct, a Supplier Code of Conduct and several policies to outline these expectations. If instances arise where these expectations are not met, we are committed to responding in an appropriate manner (up to, and including, employment and/or contract termination).

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Ramudden is a leader in the road safety sector and is a recognized expert in the field. Proudly serving Canadians for over 50 years through its predecessor entities, Ramudden specializes in traffic management, safety infrastructure, and innovative urban traffic solutions that put safety, efficiency, and environmental responsibility first. As part of the global Ramudden network, with over 5,000 colleagues across 14 countries, we combine international expertise with local knowledge to address complex traffic and safety challenges. Together, we lead with innovation, integrity, and strong governance to be a caring force for a safer world.

The primary activities of our Canadian operations include distribution, supply and install of roadside safety products tested to the highest North American crash test safety standards; manufacturing of traffic safety signs; provision of temporary traffic control services, and provision of cutting-edge digital traffic management technology. Through our wide range of products and services that outfit highways, urban roads, airports, and transit systems, we increase work zone safety for construction, contracting, and engineering firms in Ontario, as well as increase pedestrian and road safety for municipalities across Canada.

We proudly employ hundreds of employees, have an impressive fleet of vehicles, and can tackle any project that comes our way. We are committed to providing the highest level of service, expertise, and quality, and we work closely with distributors and customers to understand their specific needs.

In 2024, our supply chain primarily consisted of goods and services procured from Canada and the United States, with less than 5% of suppliers based in countries outside of North America, such as United Kingdom, Sweden, Belgium, Australia, China and India.

Our suppliers and vendors provide a range of goods and services, including high-tension cable systems, reflective sheeting, aluminum sheets, sign supports, arrow boards, trucks, concrete barriers, attenuators, guide rail systems, variable message sign boards, traffic sensors, installation and maintenance services, freight and logistics, IT and communications equipment and services, office supplies, promotional merchandise, software, and various electronic components.

In recognition of our responsibility to society and the environment as a member of the local and global community, we align our operations and sustainability initiatives to internationally recognized sustainability frameworks and standards, including the UN Sustainable Development Goals.

We place sustainability at the forefront of our values and are committed to:

- Caring for the planet by championing environmental stewardship within our operations and through the safety solutions we deliver.
- Creating meaningful positive change and social value for our people, the communities we serve and future generations.
- Collaborating with our clients, supply chain partners and stakeholders to be a driving force for a greener and more inclusive shift in our industry.

As part of a global group of companies, we recognize the impact we have is far wider than our geographical scope of operations. As a result, we strive to embed sustainability principles, including universal human rights, equality, and non-discrimination, into every aspect of our operation to ensure that every person in our direct operations and network of supply chain partners is compensated fairly and treated with respect and dignity.

3. MODERN SLAVERY RISKS IN OUR BUSINESS AND SUPPLY CHAINS

Within Our Business

We believe that the risk of forced labour or child labour among our workforce is negligible, due to the strong influence of labour unions and human resource best-practices that require Social Insurance Number (SIN) or Social Security Number (SSN) verification. Also, we do not rely on subcontractors to supplement our existing workforce, nor do we hire temporary foreign workers through programs run by either Canada or in the United States. As such, we can verify that all our employees are being properly compensated in accordance with the terms of their respective employment contracts.

Within Our Supply Chain

According to the [Global Slavery Index 2023](#), Canadian importers are exposed to modern slavery risks primarily associated with electronics, garments, textiles, gold and sugarcane. Ramudden does not import garments, textiles, gold or sugarcane of any kind. We purchase electronics to empower our employees

and safety garments to keep them safe. However, we procure these items locally from reputable domestic suppliers rather than importing them directly.

Based on internal assessments of our major Tier 1 suppliers and vendors in 2024, we identified that the risk of forced labour and child labour is minimal. In 2025, we will begin a more comprehensive mapping and assessment of the environmental, social and governance-related risks for both our direct and indirect suppliers. We recognize that we have little control and visibility over our indirect suppliers, and we continue to make reasonable efforts to understand this.

4. MEASURES TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

We conducted an internal supplier risk assessment, with a focus on the top 20 suppliers/vendors that represented 80 - 90% of procurement spend for each reporting business in 2024. Based on country-level analysis and public reports from human rights groups, as well as research published by the US Department of Labor that examines which goods are at risk of being produced by forced labour and child labour, the major suppliers of each operating business were assessed and assigned a low-, medium-, or high-risk rating. With 78% of our major procurement spend being with Canadian suppliers, 18% with American suppliers and 4% with suppliers outside of North America, including Sweden, United Kingdom, Australia and Singapore, our assessment showed that majority of our suppliers carried a low-risk for forced labour and child labour.

In 2024, we further developed our Supplier Code of Conduct to outline the values and standards of fair working conditions, respect for human rights and ethical practices that Ramudden expects its suppliers and their subcontractors to comply with when engaged in business with us.

We also implemented an online whistleblower platform, WhistleB, to provide our employees with a safe and confidential, or anonymous mechanism to report concerns about illegal, unethical or unsafe business practices without fear of retaliation or repercussions. This confidential service is administered by a dedicated taskforce consisting of representatives of our People and Culture team and Sustainability Advisor.

5. POLICIES, TRAINING AND DUE DILIGENCE

At Ramudden, we are committed to upholding the rights of our employees, customers, vendors, as well as the many workers across our supply chain who support our activities. We believe that good governance is the essential foundation of a respectful and inclusive corporate culture that earns trust and generates value for our clients and stakeholders (including the communities in which we operate). As part of our efforts to mitigate risks of modern slavery, we review and updated relevant policies and processes periodically to ensure they adequately reflect and communicate our collective responsibility to respect and protect the fundamental human rights of our employees, our customers, vendors, solicitors, and the communities in which we operate.

The following is a list and brief description of the governance policies that reduce our exposure to modern slavery, human trafficking and human rights abuses. In turn, these policies and procedures secure our social license to operate while improving the quality of our working environment.

a. Employee Code of Conduct

Ramudden does not tolerate acts of workplace violence, abuse or discrimination perpetrated against or by any employee, vendor, contractor, or any other person at the workplace or while involved in our business activities. Our Employee Code of Conduct outlines our employees' responsibilities to the organization, to each other, our stakeholders and to the public. It prescribes standards of ethical conduct for personal integrity, respect for others, protection of assets and records, community involvement, and public communications.

Employees are also expected to avoid any relationships or activities that may impair their ability to make fair and objective decisions at work. In cases where a conflict of interest exists, employees are expected to disclose the details before any activity, transaction, or relationship begins. This expectation also extends to potential conflicts of interest and instances of perceived conflicts of interest. Improper use of company trade secrets will not be tolerated. Similarly, the use of corporate assets, authority or business relationships for personal gain is expressly prohibited.

Actual or suspected violations of our Employee Code of Conduct provisions with respect to human rights are required to be reported. Anyone who breaches the Employee Code of Conduct, or fails to report an actual or potential breach, is subject to corrective action that reflects the severity of the offence. Discipline can result in action up to and including termination of employment.

b. Supplier Code of Conduct

As part of our commitment to ethical governance, we believe in working with suppliers that demonstrate high standards of ethical business conduct. Our Supplier Code of Conduct requires vendors, suppliers and other subcontractors to comply with human rights, labour and employment standards. When engaging with our suppliers, we take steps to retain them on commercially reasonable terms and conditions and we will not knowingly work with suppliers who operate unethically, unsafely, or who violate the law, compete dishonestly, or implement unfair business practices. In 2024, we included compliance with our Supplier Code of Conduct into the terms and conditions of Purchase Orders issued to vendors, with whom no other contractual commercial agreement or terms and conditions have been formally agreed to. As the scope of our operations grow in the coming years through business acquisitions, we will strive to have this become a standard practice across all our operating entities.

In suspected cases where our Supplier Code of Conduct appears to have been breached, Powell Contracting maintains the right to investigate, interview, and collect evidence of potential wrongdoing. This can include virtual, in-person, or on-premise actions as required. Failure to comply with these efforts, or steps taken to obfuscate an investigation can lead to the termination of existing contractual relationships without the standard notice period typically provided.

c. Anti-Slavery and Human Trafficking Policy

At Ramudden, we recognize that it is our duty to support and respect human rights as outlined in the United Nations' Universal Declaration of Human Rights (UDHR), the United Nations'

Guiding Principles on Business and Human Rights (UN Guiding Principles), and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We strive to uphold human rights in the markets and jurisdictions we live and operate in, ensuring that we meet or exceed the legislative requirements in all cases.

In 2024, we developed an Anti-Slavery and Human Trafficking Policy to explicitly state Ramudden's position against all forms of modern slavery, as well as our commitment to acting ethically and with integrity in all our business dealings and relationships. As we implement this policy and provide related training to employees in the coming years, we are committed to developing and implementing effective management systems and controls that ensure that nowhere in our business or supply chain is involved with modern slavery. Any employee found to be in breach of this policy will face disciplinary action up to and including summary dismissal for misconduct, wilful misconduct or gross misconduct. Additionally, we may terminate our relationship with other individuals, and organisations working with us or on our behalf if they are found in breach of this policy.

d. Whistleblowing Policy

Ramudden's Whistleblowing policy supports our continued commitment to honesty, integrity and ethical business conduct. In 2024, we launched a formal Whistleblowing policy and updated our Whistleblower program by implementing an anonymous and confidential online reporting line, WhistelB, to enable our employees and stakeholders safely report suspicions or incidents of wrongdoings, including illegal and unethical conduct. This mechanism ensures that individuals can promptly raise concerns without fear of retaliation or repercussions.

For more information or to submit a Whistleblower Complaint, please visit <https://www.ramuddenglobal-na.com/whistleblowing>

e. Anti-Corruption and Bribery Policy

Most recently updated in 2024, Ramudden maintains an Anti-Corruption and Bribery policy which reflects our commitment to uphold anti-corruption laws in Canada (the *Corruption of Foreign Public Officials Act*) and the United States (the *Foreign Corrupt Practices Act*), including anti-bribery and corruption legislations in different international jurisdictions that may be enforceable against us due to business relationships we may engage in. Due to the potential impacts of corruption and bribery to our reputation and social license to operate, Ramudden takes these legal responsibilities very seriously. Our Anti-Corruption & Anti-Bribery Policy applies equally to all directors, officers, and employees. As such, it is the responsibility of all employees to ensure that their behavior conforms to our stated views on the avoidance of bribery and corruption. Through our Delegation of Authority and Gift/Hospitality Declaration processes, we established a zero-tolerance approach to any form of bribery at any level within our organization. In suspected cases of breach of this policy, employees can also report such concerns through our whistleblower program.

In addition to these policies, our employees receive regular communication and training on adhering to our human rights position. From onboarding processes for new employees, to annual safety training sessions for field employees and diversity, equity and inclusion training for all employees, we

continuously strive to uphold our responsibility to respect and protect the fundamental human rights of our employees, our customers, supply chain, the public and other stakeholders who affect and may be affected by our business activities.

In coming years, Ramudden will:

- Continue to map our supply chain and assess risk of supplier groups with a view to forced- and child-labour risks.
- Continue to evolve and expand our due diligence and risk-mitigation process, including developing a questionnaire and sustainability performance scoring for suppliers and vendors.
- Update training material, and develop new training as required, for Ramudden employees to increase awareness around forced labour and child labour as well as our risk-mitigation process.

6. REMEDIATION MEASURES

In 2024, we did not identify any incident of forced labour or child labour in our operations or supply chain. As such, no remediation measures have been taken, and no loss of income to vulnerable families because of such actions is anticipated.

As we take steps to improve our supplier risk management practices and increase visibility across all levels of our supply chain, if we do identify incidents of forced labour within our activities or supply chains, we will consider the appropriate remediation strategies to implement in compliance with Canadian and international standards.

7. MEASURING OUR EFFECTIVENESS

Ramudden does not yet have a formal process for measuring effectiveness in the mitigation and prevention of forced and child labour risks other than a periodic review of our activities, suppliers and supply chain.

As we begin to implement the risk-mitigation actions outlined in our Anti-Slavery and Human Trafficking policy, continue to review reported cases through our Whistleblower program and deploy new training, we intend to identify key performance indicators to help us assess the effectiveness of the actions we are taking.

We will continue to develop our audit protocols to review our success, the number of employees trained, and the number of suppliers assessed and communicated with. We will also conduct an annual review of our policies and procedures to ensure that they are in compliance with applicable regulations and that we meet our social impact commitments.

8. ATTESTATION AND APPROVAL

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors and Executive Management of Ramudden Global (North America) Inc. for the fiscal year ended December 31, 2024.

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the 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.

A handwritten signature in black ink, reading "Jamie West", positioned above a horizontal line.

Jamie West
Country President, Canada
Ramudden Global (North America) Inc.
May 29, 2025

*I have the authority to bind Ramudden Global
(North America) Inc., Ramudden Global (Canada)
Inc., Powell (Richmond Hill) Contracting Limited
and Pivot Safety Products Inc.*