



Fighting Against Modern Slavery in Canada

BILL S-211



Report on Our Commitment to the Fight Against Modern Slavery

Reporting Period for The Year Ending May 31, 2024

This report is prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* in effect as of January 01, 2024. It sets out the commitment, renewed annually, of T&T Power Group Inc. and its stakeholders to prevent modern slavery, child labour, forced labour and human trafficking in all activities and relationships with partners. This report describes the measures in place for T&T Power Group Inc. to achieve this.

Our Structure, Commercial Activities and Supply Chain

Our Structure

Formed in 1980, and incorporated in Canada, T&T Power Group offers design, distribution, and services for power generation to individuals, businesses, and governments across Canada. We employ roughly 125 people coast to coast, with our headquarters based in Ontario. T&T Power Group strives to meet the highest standards of corporate responsibility, while having a positive impact on all our stakeholders.

Our Activities

T&T Power Group Inc. operates several locations throughout Canada. Manufacturing, Distribution, Service, and Sales, complement the growth of our operations.

Our Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Modern slavery, child labour, forced labour and human trafficking go against T&T Power Group's values and ethics. We adhere to the *Canadian Human Rights Act*, *The Code of Conduct*, *The ESA Act*, and the *Fundamental Principles and Rights at Work*. T&T Power Group has a zero-tolerance policy for Child Labour.

Our Human Rights Statement

Our Human Rights Statement sets out our guiding principles, commitments, and expectations in terms of human rights. It outlines how T&T Power Group applies its principles in its activities and relationships with stakeholders, with respect to its various roles:

- Provider of Products and Services
- Partner to Local Organizations
- Corporate Citizen to Communities it Serves

Our Code of Conduct and our Ethical Work Environment

Our Code of Conduct sets out the guiding principles that define our professional ethics. It states that employees, directors, and officers must comply with the laws and regulations that apply wherever we do business. It also contains provisions to maintain a respectful, welcoming, people centric and positive work environment. This code is in our employee handbook that all employees and any directors get at our onboarding stage. It must be reviewed and signed off on before commencing any work with T&T. This handbook is reviewed annually, and training is provided if necessary.

T&T Power Group takes great pride and values the quality of the environment it offers employees, and takes steps to promote an open, healthy and inclusive workplace. T&T has therefore drawn up policies and practices intended to ensure employment equity and respect for human rights while preventing discrimination and violence and harassment at work. Inclusion and diversity are an integral part of T&T Power Groups values.



Our Due Diligence Processes

Assessing and mitigating social risk is integral to T&T Power Groups risk management framework. Social issues play an increasing important role in T&T's strategies and decisions. Accounting for these risks helps promote best practices among our stakeholders.

Our Quality Safety Environmental Management Committee ("QSEMS"), Business Continuity Planning Team (BCPT) and our directors oversee T&T's QSEMS initiatives. This program is intended to ensure our policies, procedures and control measures are adequate to manage risks and keep them within the limits of T&T's satisfactory level of risk.

ESG criteria is integrated into T&T Power Group's processes. This involves carrying out due diligence, starting out with T&T Power Group's portfolio. The ESG risk analysis framework includes, among others, criteria related to human rights policies.

Our Human Resources Team ("HR") is mandated to ensure that human resources management strategies and organizational culture are aligned with T&T's ESG practices and strategies.

T&T Power Groups QSEMS committee, our BCPT team and our Human Resources are responsible for keeping informed of ESG best practices and overseeing T&T's strategies in this area.

Parts of Our Business and Supply Chains that Carry a Risk of Forced Labour or Child Labour and Measures taken to Assess and Manage Such Risk

Our Supply

T&T Power Groups supply chain includes acquisitions from local, regional, national, and international suppliers. Primarily suppliers in Gas, Diesel Engines, VFD's AC alternator, associated Fluids and Consumables, and other Electrical and Mechanical Components.

Our Partners

T&T prioritize suppliers that share its values and requires that they comply with applicable legislation, in particular concerning employment standards, non-discrimination, and human rights. Our contract will continue to include our Supplier Code of Conduct.

Our Supplier Code of Conduct

T&T Power Group's Supplier Code of Conduct outlines our expectations of suppliers with respect to responsible business practices. These expectations reflect our values and how they apply in practices, as approved by its senior management, and its committees, as applicable. This code presents standards which suppliers must adhere to in their business relationship with T&T Power Group. By adopting this code, T&T affirms its intention to deal with suppliers who take environmental, social and governance (ESG) factors into consideration in their activities and throughout their supply chain.

In terms of the fight against modern slavery, forced labour and child labour in supply chains, the Suppliers Code of Conduct specifies that suppliers must not use:

- Child Labour
- Forced or Compulsory Labour
- Involuntary or Debt Bondage
- Any Other Type of Modern Slavery Practices

Reasonable and appropriate control measures are set out in the code, such as T&T's right to take corrective action in certain circumstances of non-compliance with the code. Such actions can range from issuing a warning to terminating a contract in whole or in part, or even terminating a business relationship.

Our Expectations of Our Suppliers

Suppliers must have a zero-tolerance policy in this regard for all their facilities and business activities and within their entire supply chain. Suppliers must demonstrate that Child Labour and Forced Labour are not used in their operations. Suppliers must also be able to provide evidence of the due diligence process in place to manage labour issues in their supply chain. Suppliers must confirm that their supply chain is free from modern slavery practices and may be asked to provide evidence to T&T Power Group Inc. on a regular basis.

Sectors of Activity Most at Risk

- Construction
- Electronics and Electricity
- Cleaning and Premises Management
- Transportation

T&T Power Group Inc. manages the risk of forced labour and child labour via our policies, practices, and processes. We prioritize the adoption of responsible, equitable sourcing practices while ensuring effective management of our suppliers and vendors. T&T expects that the suppliers we do business with, can demonstrate that forced labour and child labour are not used in their activities. T&T Power Group Inc. will increase oversight on the sectors that present a greater risk.

Measures Taken to Remediate any Forced Labour or Child Labour

Our procedures have indicated that in no instances has modern slavery, child labour, forced labour, or human trafficking been detected. However, T&T Power Group Inc. has implemented further measures and procedures to ensure we remediate such instances if necessary.

Reporting Infractions

T&T Power Group will act in the event of non-compliance with its policies and practices. With our reporting mechanisms and resources measures in place for employees and other stakeholders who wish to express their concerns confidentially or anonymously, without risk of reprisals.

Senior Management, Managers, Supervisors and Employees are responsible for reporting all unethical behaviour or behaviour that goes against the Code of Conduct or any other policies or rules, including any human rights violations. In any situation, an employee can report to their manager, their managers manager, or one of the resources set out in the Code of Conduct.

All our Stakeholders and suppliers also agree to report any infractions, in accordance with the Supplier Code of Conduct.

T&T Power Group Inc. invites partners who have reasonable grounds to believe that T&T or any other person is committing a wrongdoing to report it confidentially or anonymously by



informing T&T, with the aim of promoting compliance and culture. Each report will be reviewed confidentially in accordance with legislation, regulations, and industry standards and best practices.

Training

Training sessions are made available throughout the year to continue to teach employees about various human rights topics and highlight the mechanisms in place to report behaviour that goes against our stated principles.

Annual regulatory training will continue to be provided which covers regulatory compliance. Employees can also access diversity training sessions that will help teach them how to create a work environment free of discrimination. Through mandatory training on the prevention of workplace violence and harassment, employees learn to understand and detect harassment and violence in the workplace and discover ways to prevent it.

Furthermore, employees must complete a mandatory Environmental, Social and Governance (ESG) training to help them understand what ESG represents and how it ties into corporate social responsibilities and sustainable development. This training also aims to help employees understand how they can contribute to T&T Power Groups objectives.

Assessing The Effectiveness in Ensuring That Forced Labour and Child Labour Are Not Being Used in Our Business and Supply Chains

To measure the effectiveness of our approach to managing social risks, we rely on information provided by various stakeholders, including clients, suppliers, and members of the community.

During fiscal 2023, no instances of modern slavery or human trafficking involving our suppliers were detected by oversight procedures.

We will be carrying out control assessments, etc., to establish our suppliers risk levels more carefully, which will help us identify activities that may breach our Supplier Code of Conduct.

Conclusion

T&T Power Group Inc. is committed to preventing and fighting all forms of modern slavery and human trafficking in our activities and supply chains. As such, we will continue to regularly review our processes, practices, and policies to identify opportunities for improvement.

Review and Approval

For T&T Power Group Inc.

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 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 T&T Power Group Inc.



Tyler Van Dyke
President
May 28, 2024