



Your OEM Alternative

PUBLIC SAFETY COMMISSION

REPORT ON CHILD AND FORCED LABOUR IN THE CANADIAN SUPPLY CHAIN

FOR UNION TRACTOR LIMITED

YEAR 2023

This report is provided in accordance with the requirements of Bill-S211 – which enacts the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, assented to May 11, 2023. Union Tractor Limited (“Union Tractor”) did not have documented processes for procedures in place relating to Forced and Child Labour for 2023. We are implementing a documented Program for 2024 and details are included in this Report.

STRUCTURE, ACTIVITIES, SUPPLY CHAIN:

Legal Name:	UNION TRACTOR LIMITED
Financial Report Year:	2023
Business Number:	105448161
Joint Report:	No
Other Jurisdictions:	No
Entity Categorization:	Canadian Presence and Meets Size Related Thresholds
Sector/Industry:	Wholesale/Retail Trade
Locations in Canada:	Nisku, Alberta – Corporate Head Office/Distribution Center Red Deer, Alberta Grande Prairie, Alberta Prince George, British Columbia Kamloops, British Columbia Chilliwack, British Columbia
Employees:	86

Union Tractor is a Corporation whose Company's mandate has always been to provide OEM quality service and parts at aftermarket prices. Provided is our Organizational Chart (Attachment I)

We import , as well as source goods domestically from Suppliers and Distributors around the world and in Canada. The products imported are parts and accessories for Tractors, our domestic purchases are ground engaging tools (steel), oil (engine, transmission and hydraulic) and diesel fuel.

Provided is the list of the countries from which we have imported high dollar volume in 2023:

United States	\$6,497,885
China	\$2,442,144
Korea	\$2,567,023

Our sales for 2023 were \$40M which the majority were Canadian sales and less than \$100K sold to the United States. We do not have any International Sales. Our Sales for the major part are to direct consumers with less than \$750K being sold to Distributors/Retail Outlets.

POLICIES AND DUE DILIGENCE PROCESSES:

Union Tractor has in place a Forced and Child Labour Policy which was created in 2024 (Attachment II). For 2023 we did not have a structured Forced-Child Labour Policy nor Procedure in place.

In 2024 Union Tractor created our formal Forced and Child Labour Policy (Attachment II) which conveys our company's stand on this global issue. This policy also extends to our Suppliers. Our Forced – Child Labour Procedures (Attachment III) details how we are communicating with our Suppliers their required participation and adherence. This document addresses our requirements as it relates to Forced and Child Labour and how it will not be tolerated in any area of our Supply Chain. Suppliers must fully comply with all anti-slavery, forced labour and human trafficking laws, and enact adequate policies and procedures to ensure compliance with such laws.

Our Forced and Child Labour Procedure includes:

1. Maintaining current Forced and Child Labour Policy on our website
2. Maintaining current Annual Report to Public Safety Canada on our website
3. Mapping of Supply Chains
4. Research US-UFLPA Entity List to confirm Supplier's name is not shown.
5. Communication with Suppliers relating to our Forced and Child Labour Policy
6. Questionnaire to be sent to Suppliers to detail/confirm they have a Program in place relating to Child/Forced Labour
7. Review of Questionnaire responses to determine if Supplier has sufficient controls in place. Clarification of responses to be requested if required.
8. If Supplier does not have a Program in place or an insufficient Program determination of risk to be conducted to determine if relationship to continue
9. At time of an on-site visit verification of Program detailed in Questionnaire to be confirmed

10. If Forced or Child Labour identified or suspected in Supply Chain work with Supplier to remove from supply chain, if not cease relationship immediately.
11. Yearly training to be provided to Staff.

FORCED LABOUR AND CHILD LABOUR RISKS:

As noted above our Supply Chains includes goods manufactured mainly in China, Korea, United States which are imported directly to Canada. The goods of Italian origin are imported to the United States and then shipped to Canada. There is known Forced and Child Labour in a number of origin countries and to address this we are implementing procedures in 2024 to address this directly with our Suppliers (Attachment III- Procedure)

We will performing our due diligence for 2024 by requiring our Supplier to provide confirmation of their Programs to meet the Canadian standards.

REMEDIATION MEASURES/REMEDIATION OF LOSS INCOME/ASSESSING EFFECTIVENESS:

For the reporting year 2023 we did not identify instances of Forced or Child labour, thereby there was not the requirement for remediation measures/remediation of loss income or assessing effectiveness.

TRAINING:

For reporting Year 2023 – we did not conduct training on this issue. As part of our Forced and Child Labour Procedure we will be conducting training in 2024 of our staff, to bring to their attention that Forced and Child Labour is happening around the world and the steps Union Tractor are taking to try to alleviate and their responsibility to be diligent.

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.”

Martin Winter
President
May 29, 2024

I have the authority to bind Union Tractor Ltd.

 APPROVED
Martin Winter