

Introduction

This joint annual report has been created by R.W. Tomlinson Ltd., Tomlinson Environmental Services, and 2839034 Ontario Inc., operating as Material Supply and Logistics (collectively “**The Tomlinson Group**”) for the sole purpose of meeting their obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”). The content of this joint annual report is applicable to all entities described herein, unless indicated otherwise, for the financial year commencing on November 1, 2023, and ending on October 31, 2024.

Commitment

The Tomlinson Group is committed to respecting human rights and ensuring that forced labour and child labour is not a part of the products within its supply chain.

Structures, Activities and Supply Chains

R.W. Tomlinson Ltd. is the parent company of Tomlinson Environmental Services Limited and 2839034 Ontario Inc., operating as Material Supply and Logistics. A diagram of the Tomlinson Group’s structure is provided below:



R.W. Tomlinson Ltd. was established in 1952 to provide construction services, to produce, to distribute, and to sell construction materials, including but not limited to aggregates, asphalt, and concrete.

Tomlinson Environmental Services Limited was established in 2006 for all services relating to solid waste, industrial waste, emergency response, and portable toilet rentals.

2839034 Ontario Inc., operating as Material Supply and Logistics, was established in 2021 for the procurement and distribution of construction materials, supplies, and small equipment rentals.

Most of the Tomlinson Group's direct vendors are located in Canada, and the other vendors are located in the United States of America. The Tomlinson Group's supply chain primarily consists of vendors related to the procurement of heavy machinery, machine parts, raw materials and supplies for construction use, and fuel. The Tomlinson Group recognizes that these suppliers may have in turn purchased goods originating, remanufactured, or distributed from other countries.

Policies and Due Diligence Procedures

The Tomlinson Group's Employee Handbook contains an overarching principle of treating all employees fairly, with dignity and respect throughout all its business activities. It includes policies on minimum age requirements for all employees and driver's license verification for employees whose work requires the operation of a motor vehicle. These measures help to reduce the risk of forced labour and child labour in the Tomlinson Group's activities.

Steps Taken in Prior Financial Year

The above policies and due diligence procedures were in place throughout 2024. The Tomlinson Group did not take any other steps specific to forced labour and child labour prevention in the 2024 fiscal year.

Risk Identification

The Tomlinson Group recognizes that certain goods have a higher risk of forced labour or child labour.¹ In the 2024 reporting period, the Tomlinson Group completed a review of its imports to Canada, which included, parts, inventory, capital and rental equipment. Through this review, the Tomlinson Group identified that 92% of its goods are sourced from low-risk suppliers, the majority of whom are located in the United States. Moreover, the remaining 8% of goods imported by the Tomlinson Group were either not on the U.S. Department of Labour's "List of Goods Produced by Child Labor or Forced Labor", or the vendors had public statements and/or policies regarding child labour and forced labour. The Tomlinson Group continues to investigate these risks to ensure that its practices and policies are reinforced. Based on its review of direct suppliers, the Tomlinson Group has concluded that there is a low risk of forced labour and/or child labour in its immediate supply chains.

Remediation Actions

The Tomlinson Group has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

¹ See, for example, U.S. Department of Labor – Bureau of International Labor Affairs, "List of Goods Produced by Child Labor or Forced Labor": <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>.

Remediation of Loss of Income

The Tomlinson Group has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any remediation measures for loss of income

Training

The Tomlinson Group provides employee training as part of its onboarding process. This includes training with respect to safe, ethical, and legally compliant workplace practices and policies. The Tomlinson Group policies are reinforced on an annual basis. In the 2024 financial reporting year, the Tomlinson Group did not provide training to its employees specific to forced labour or child labour. Moving forward, it will be assessing what related training may be appropriate.

Assessing Effectiveness and Continuous Improvement

The Tomlinson Group assesses its effectiveness in addressing the risks of forced labour and child labour in its activities and supply chain by regularly reviewing its policies and procedures related to forced labour and child labour. In the 2024 financial reporting year, the Tomlinson Group also completed a review of its top 25 direct vendors. It determined that 17 of its top 25 direct vendors submitted reports under the Act for the 2023 reporting year. These vendor reports indicated a minimal risk associated with forced labour or child labour in their supply chains and there were no reported instances of forced labour or child labour. Of the remaining eight vendors, three have safety and ESG statements available on their websites.

Approval and 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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of R.W. Tomlinson Ltd., Tomlinson Environmental Services, and 2839034 Ontario Inc. have executed this report as of the effective date of the signature set out below.

SIGNED

May 30/25
Date

)
)
)
)
)
)
)
)
)
)

R.W. TOMLINSON LTD.

Per: 

Name:

Title:

I have authority to bind R.W. Tomlinson Ltd.

SIGNED

Date May 30/25

TOMLINSON ENVIRONMENTAL SERVICES

Per: _____
Name: _____
Title: _____

I have authority to bind Tomlinson Environmental Services

SIGNED

May 30/25
Date

2839034 ONTARIO INC.

Per: _____
Name: _____
Title: _____

I have authority to bind 2839034 Ontario Inc.

References

[List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)