

# **CANADA BILL S-211**

Westcon Equipment & Rentals Reporting Fiscal Year: November 1, 2022 to October 31, 2023

## Subsection 11(1)

During the financial year November 1, 2022 to October 31, 2023; Westcon Equipment and Rentals Ltd engaged in a number of steps to reduce or prevent the risk that forced labour or child labour is used in our supply chain. These steps involved monitoring our supplier's online publishing of statements concerning policy about mitigating forced labour and child labour risks, monitoring the staffing practices of our on-site subcontractors and following up on any concerns concerning vendors or subcontractors.

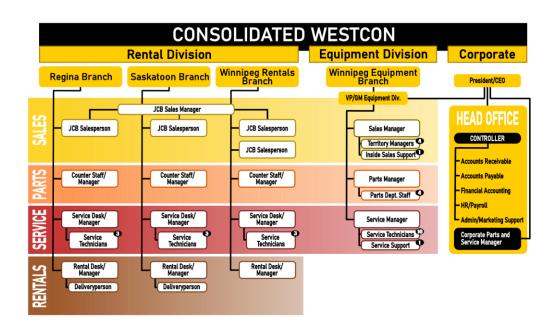
### Subsection 11(3)

The following will address requirements (a) to (g) of **Subsection 11(3)** 

## Subsection 11(3)(a) Structure, Activities and Supply Chains STRUCTURE

Westcon Equipment and Rentals Ltd. is structured as a Corporation. Westcon Equipment and Rentals Ltd. operates out of four branches located in Emerald Park, Saskatchewan, Saskatoon, Saskatchewan and Winnipeg, Manitoba. All branches are located in Canada. Westcon Head Office is situated at the branch located in Emerald Park, Saskatchewan.

Westcon Equipment and Rentals Ltd. employed an average of 56 employees during the reporting period, all located within Canada. Westcon Equipment and Rentals Ltd. is structured around a Chain of Command, from which Departments operate. Please refer to the following Organizational Chart for detail:



#### **ACTIVITIES**

Westcon Equipment and Rentals Ltd. is located solely in Canada in the provinces of Saskatchewan and Manitoba and is a construction equipment dealership which offers Equipment Sales, Parts, Service and Rentals. Westcon Equipment and Rentals Ltd. operates largely within the Canadian market; but will occasionally conduct retail sales business with American, Mexican and European customers.

Equipment and equipment parts are sourced from Canadian suppliers and imported mainly from North American suppliers, as well as many other jurisdictions. Goods imported from the United States into Canada include equipment such as Skid Steers, Loaders, Excavators, Material Handlers, Pavers and other Lift products. Our equipment is imported from the United States, Great Britain and European manufacturers. The vast majority of our Parts inventory for maintenance and repair of construction equipment is imported from the United States and Great Britain.

#### **SUPPLY CHAIN**

In fiscal year 2023, the majority of Westcon Equipment and Rentals Ltd. spend was directed to support its operations in it's four Canadan branches. The following categories accounted for the majority of spend:

- 1) **OEM's (Equipment Manufacturers)**
- 2) OEM's (Parts Suppliers)
- 3) Aftermarket Suppliers

Westcon Equipment and Rentals Ltd. Total Import Volume for fiscal year 2023 by origin country:

Country of Origin	Import Volume Percentage
USA	68%
GERMANY	10%
FRANCE	5%
CANADA	4%
GREAT BRITAIN	3%
ITALY	2%
TAIWAN	2%
MEXICO	2%
OTHER	4%

## Subsection 11(3)(b) Policies and due diligence processes

## **POLICIES**

At present, Westcon Equipment and Rentals Ltd. does not have an established Forced Labour and Child Labour policy embedded into our management system.

#### **DUE DILIGENCE**

Westcon Equipment and Rentals Ltd. endeavors to identify any potential impacts in operations, supply chains and business relationships and is committed to ceasing, preventing or mitigating adverse impacts, when identified. At present, Westcon Equipment and Rentals Ltd. does not have an established method of tracking implementation and results, communicating how impacts are addressed or providing for remediation when appropriate. Westcon does implement measures in our hiring processes; requiring applicants to provide a Criminal Records Check and Driver's Abstract as part of the onboarding process.

#### Subsection 11(3)(c) Forced labour and child labour risks

Westcon Equipment and Rentals Ltd.'s greatest risk exposure to forced labour and child labour is through suppliers, and the primary sources of these risks come from Suppliers who may be procuring raw materials in higher-risk geographies and sectors. We recognize the potential risks of forced labour and child labour in our extended supply chain and the complexity and challenges in operationalizing modern slavery compliance.

Westcon Equipment and Rentals Ltd. does maintain a consistent effort to monitor our supplier's online publishing of statements concerning policy about mitigating forced labour and child labour risks, as well as practicing oversight in the staffing practices of our on-site subcontractors and following up on any concerns with vendors or subcontractors.

Westcon Equipment and Rentals Ltd. strongly believes in and maintains a culture where employees are supported in conducting business uprightly and to that end we foster a "speak up culture" to encourage reporting of concerns to management, providing immunity from retaliation for good faith reporting of incidents or issues.

## Subsection 11(3)(d) Remediation Measures

Westcon Equipment and Rentals Ltd. has not identified any instances of forced labour or child labour in our activities or supply chain and did not implement any remediation measures in the 2023 fiscal year.

## Subsection 11(3)(e) Remediation of Loss of Income

Westcon Equipment and Rentals Ltd. has not identified any instances of forced labour or child labour in our activities or supply chain and did not implement any remediation measures in the 2023 fiscal year.

#### Subsection 11(3)(f) Training

At present, Westcon Equipment and Rentals Ltd. has not developed a training program to deploy to train employees concerning forced labour and child labour.

## Subsection 11(3)(g) Assessing Effectiveness

Westcon Equipment and Rentals Ltd. has not yet established a method of assessing the effectiveness of our efforts concerning forced labour and child labour.

# **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. I have the authority to bind Westcon Equipment & Rentals Ltd.

Brian Brown
President and CEO
Westcon Equipment & Rentals Ltd.