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<b>Title: Modern Slavery Report</b>	<b>Date of Issue: May 3, 2024</b> <b>Revised: May 22, 2025</b>
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This Modern Slavery Report (“Report”) addresses the period from February 1, 2024, to January 31, 2025. It has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)- Bill S-211*.

This Report is written on behalf of Delta Power Equipment Ltd. A French version of this Report may be requested by emailing [hr@deltapower.ca](mailto:hr@deltapower.ca).

## 1. Introduction

- 1.1 Delta Power Equipment Ltd. (“**Delta Power**”) is committed to acting ethically and with integrity in our business and our supply chains (collectively, our “**business**”) and protecting the dignity and human rights of all people connected to our business. We seek to foster inclusive workplaces and sourcing products responsibly and strive to work closely with our vendors and suppliers (collectively, “**suppliers**”) to ensure these objectives are implemented and maintained in their workforce and their supply chains.
- 1.2 This statement will be reviewed and, if necessary, revised annually.
- 1.3 Delta Power acknowledges that it cannot stop forced and child labour globally, but it does acknowledge that preventing forced and child labour within its supply chains is an important step in the long process of halting the practices of modern slavery worldwide.
- 1.4 This statement outlines the measures Delta Power has in place and the efforts Delta Power has implemented to assess and address the risks of forced and child labour in our business.

## 2. Reporting Entity

- 2.1 Delta Power Equipment Ltd. is an Ontario corporation with a financial reporting year ending on January 31 each year.
- 2.2 Delta Power is an agricultural dealership engaged in the sale, servicing and distribution of farm equipment across Ontario, Canada. We also supply parts, attachments, and services to support those products. Our customers are largely the end-users of our products, consisting mainly of agricultural businesses and consumers located in Canada. We occasionally supply agricultural equipment and associated products to other equipment distributors.
- 2.3 Delta Power employs approximately 480 people in the following locations: Essex, Tilbury, Essex, Tilbury, Chatham, Alvinston, Watford, Forest, Exeter, Seaforth, Mitchell, St. Marys, Sparta, Waterford, Winchester, Dunvegan and Renfrew; and has business operations solely in Canada. We are headquartered in Exeter Ontario.
- 2.4 In total we procure goods and services from approximately 500 suppliers and contractors.

To learn more about Delta Power, please see <https://www.deltapower.ca/>

## 3. Business Activities and Supply Chains

Delta Power Equipment sources farm equipment, machinery components, and parts from a range of suppliers, including international manufacturers. Some of these goods are imported into Canada. Our supply chain spans multiple tears, primarily originating from North America and Europe, with select components sourced from other global regions. We receive goods from our suppliers as finished complete goods and parts.

#### **4. Our Policies**

- 4.1 We maintain a Supplier Code of Conduct that outlines our expectations for ethical business practices, including the prohibition of forced labour and child labour. All new and existing suppliers are expected to comply with these standards as a condition for doing business with us. Our Supplier Code of Conduct can be found on our website.
- 4.2 Through our Human Rights Policy we communicate our values and expectations, setting a high bar for ourselves and our Suppliers to ensure we provide a working environment for all employees that fosters openness and tolerance; and are free from direct or indirect discrimination.
- 4.3 Our Children in the Workplace Policy is intended to minimize the disruption at work, when visitors, such as children, visit. Delta wants to create a supportive working climate for employees while meeting family obligations and outlining when children can appropriately be at the workplace.

#### **5. Our Due Diligence Processes**

- 5.1 Delta Power annually assesses our employment practices to ensure that we at the minimum meet employment standards in the locations where we employ employees. We take all reasonable steps during the hiring process to ensure we are employing appropriate and ethical workers.
- 5.2 Internally, we believe that the risk of forced labour or child labour among our personnel is negligible. Our recruitment processes ensure compliance with the standards currently in force in Canada, where most of our personnel come from. Our management team also implement and oversee the use of our human resource policies.
- 5.3 Delta Power Equipment expects third parties, with which we work, to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. As part of being socially responsible, Delta Power Equipment takes steps to evaluate third-party relationships and mitigate any associated risks by carrying out risk-based due diligence.
- 5.4 Delta Power has completed a review of our key supplier corporate policies and have found that they have current Anti-Slavery and Human Trafficking Statements that align with Delta Power Equipment's position.

The links below provide the Tier-one Supplier Statements to Anti-Slavery in the Supply Chain:

**CNH Industrial:**

[https://www.cnh.com/-/media/CNH/cnhicorporate/Governance/corporate\\_governance/slavery\\_and\\_human\\_trafficking\\_statement/docs/CNH-Anti-Slavery-2022\\_V7.pdf?rev=c84b0240856244b786db85edc36b07cd](https://www.cnh.com/-/media/CNH/cnhicorporate/Governance/corporate_governance/slavery_and_human_trafficking_statement/docs/CNH-Anti-Slavery-2022_V7.pdf?rev=c84b0240856244b786db85edc36b07cd)

**BRP:** <https://www.brp.com/en/our-company/ethics-compliance.html>

JCB: [https://www.jcb.com/dfsmedia/261086efe15a46f5afb95d093ef038ea/62068\\_source#:~:text=JCB%20has%20a%20zero%20tolerance,that%20this%20approach%20is%20effective.](https://www.jcb.com/dfsmedia/261086efe15a46f5afb95d093ef038ea/62068_source#:~:text=JCB%20has%20a%20zero%20tolerance,that%20this%20approach%20is%20effective.)

Kobelco: <https://www.kobelco.co.jp/english/sustainability/procurement.html>

Yanmar: [https://www.yanmar.com/global/about/csr/procurement/supply\\_chain/](https://www.yanmar.com/global/about/csr/procurement/supply_chain/)

5.5 Should credible concerns be reported in good faith or if the presence of forced or child labour is identified in current or potential suppliers supply chains, we will conduct a thorough assessment of our collaboration with that supplier. Business relationships can be impacted if such issues are found and can lead to consequences, including temporary or permanently terminating business relationships where appropriate.

## 6. Assessing our Risk

6.1 Delta Power has started the process of identifying risks, but there are still gaps in our assessments. Within Delta Power's business operations, we have assessed a low level of risk based on the following risk criteria:

- **Country risk:** According to The Global Slavery Index the Delta Power Equipment, does not import from the most prevalent countries of modern slavery.
- **Sector or industry risk:** Delta Power imports goods that are on the lower risk of sectors that contribute to forced or child labour, according to The Global Slavery Index.
- **Business or transaction risk:** The business of agricultural or construction machinery is not identified as one of the highest contributors to slave labour, therefore we hope this limits the risk in the supply chain.
- **Raw materials risk:** There could be a potential risk in this area, that should be assessed further with the suppliers we import from.

6.2 In assessing the risk of forced and child labour in our business and supply chains, we assume that dealing with large, very reputable companies minimizes this risk. Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as transportation, warehousing, construction, and manufacturing. We recognize that our exposure of forced labour and/or child labour increases when we engage with suppliers who source goods or raw materials from countries where forced labour exploitation is known to occur. As such, we will need to contact our manufacturers to gain knowledge on how they minimize exposure to these activities. Our main supplier is CNH Industrial. They are committed to social responsibility and have published information in support of that, as mentioned above. Our due diligence is prioritized to the most significant adverse impacts based on severity and likelihood of harm and focus our attention and resources.

## **7. Remediation Measures**

7.1 Our Supplier Code of Conduct requires our suppliers to adhere to high standards of ethical conduct. Forced and child labour will not be tolerated.

7.2 In the event that we discover any forced or child labour in our business or supply chains, we will take the following measures to remediate such forced or child labour:

- Suspension or termination of a supplier, contractor or other business partners.
- Actions to prevent forced or child labour from recurring.

7.3 No incidents of forced labour or child labour were reported in our operations or supply chain in the past year. As such, no remediation actions were required. While no specific instances were identified, we recognize the importance of continuous monitoring.

## **8. Training and Communication**

8.1 Relevant management and procurement staff have been briefed on modern slavery risks and the obligations under Bill S-211. Training resources are available internally and are being expanded in 2025.

8.2 Training covered the requirements of Bill S-211, the global prevalence of child and forced labour, how it extends across our operations and throughout the supply chain, and that all employees have a responsibility to reduce the risk of child or forced labour within business activities.

8.3 We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

## **9. Effectiveness Monitoring**

9.1 While we have yet to establish formal policies and procedures for evaluating the effectiveness of the varied measures implemented to mitigate the risk of forced or child labour within our supply chains, we are committed to taking the necessary steps to assess their effectiveness.

9.2 Delta Power plans to implement the following non-exhaustive list of actions:

- Expand supplier risk assessments to gain deeper understanding of potential exposure to forced and child labour risks in our global supply chains; especially when contemplating new suppliers or renewing existing contracts with existing suppliers.
- Create Whistle-blower policy and reporting procedures.
- Policies will be enhanced to incorporate processes to help monitor compliance on an ongoing basis and will be revised as required.

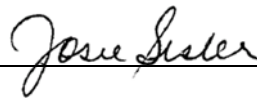
9.3 To date no significant concerns or complaints have been identified.

## 10. Approval and Attestation

This Report was approved by Delta Power Equipment's Board of Directors on May 22nd, 2025, and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at <https://www.deltapower.ca/>.

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.

DATED 22 May 2025



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Name: **Josie Sisler, CEO**  
**Delta Power Equipment Ltd.**

I have the authority to bind the  
corporation