

MODERN SLAVERY DISCLOSURE STATEMENT

The Act came into force on January 1st, 2024, and requires certain businesses to disclose their efforts to address the issue of forced labour and child labour ("Modern Slavery") in their business operations and supply chains. This new law is intended to prevent and reduce the risks of Modern Slavery in the supply networks of Canadian businesses. NCSG Leasing GP Corp. and its subsidiaries¹ (collectively referred to as "NCSG") makes this joint statement ("Statement") pursuant to the Act on its own behalf and on behalf of its subsidiaries.

Background

This Modern Slavery Statement sets out the actions taken by NCSG during the fiscal year ending December 31, 2023. NCSG is committed to ensuring compliancy and promoting best practices to prevent and reduce the risk of forced labour and child labour in our supply chain. NCSG is not subject to reporting obligations related to Modern Slavery under other jurisdictions.

About Us

NCSG provides mobile crane rental and transportation services throughout Western Canada. With approximately 400 employees across a network of branch locations, NCSG services a variety of industries such as refining, upgrading, upstream oil & gas, utilities, forestry, mining and wind energy. NCSG is headquartered in Acheson, Alberta and is proud to be one of the top fully operated and maintained crane companies in North America. The Company operates under two primary divisions: crane rental and heavy haul transportation.

Policies on Slavery and Human Trafficking

NCSG is committed to fair dealing and high ethical standards in everything we do. Key to this commitment is the personal integrity of our people. The NCSG Code of Conduct, incorporated in our NCSG Employee Handbook (available to all employees through our Learning Management Software system) reflects the requirements that our employees comply with all applicable laws and regulations and act with integrity. We actively promote and encourage fair dealings and working in a socially responsible manner.

¹ The NCSG subsidiaries this Statement is made on behalf of are: (i) NCSG Crane & Heavy Haul Services Ltd.; (ii) NCSG Crane & Heavy Haul Services Trans Tech Inc.; (iii) NCSG Hauling & Rigging Ltd.; (iv) NCSG Engineering Ltd.; (v) NCSG MGMT Ltd.; and (vi) NCSG Ventures Ltd.

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NCSG utilizes a variety of suppliers, primarily local or Canadian-based, but acknowledges that there could be a risk of child labour within current supply chains, especially in industries and regions where labour standards may be less stringent, or processes and procedures may be lacking. We strive to seek long-term relationships with suppliers that share the same strict standards of quality, integrity and human rights, product excellence and overall compliance with all local laws and regulations.

NCSG is committed to doing business in full compliance with all local laws and regulations and will be implementing a formalized Supplier Code of Conduct to outline our supplier expectations to ensure our supplychain partners conduct business ethically and with the same high standards. Through ongoing improvements in our supply chain processes, NCSG aims to partner with suppliers that do not contribute to exploitation and harm to vulnerable populations.

Due Diligence Process and Monitoring

NCSG utilizes an anonymous, confidential and accessible Whistleblower tool called FaceUp enabling anyone to report potential breaches of NCSG's policies or concerns. Pursuant to NCSG's Whistleblower process, all such complaints will be promptly and thoroughly investigated by the appropriate staff member in accordance with NCSG's policies.

Risk Assessment

NCSG did not complete a formal, documented risk assessment of its supply chain in fiscal 2023. The Company has commenced a Modern Slavery-related risk assessment process for 2024 and is in the initial stages of the assessment process with a focus on the highest risk supplier categories as defined by our processes. We do understand that our suppliers may use products that originate from other jurisdictions, and our suppliers will potentially have their own global supply chains for consideration. Accordingly, we intend to further assess, understand and do our part in mitigating risk in our supply chain.

Based on our findings to date, NCSG considers there to be a low risk of Modern Slavery occurring within its business considering our workforce, policies and procedures that govern recruitment, hiring practices, working conditions and the ethical treatment of our employees.

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Remediation

In 2023, NCSG did not identify any instances of Modern Slavery in its activities or supply chains. As a result, it did not take any measures to remediate Modern Slavery, or any loss of income for vulnerable families resulting therefrom.

Training

All employees receive the NCSG Employee Orientation which introduces employees to certain NCSG policies and procedures, including expectations for employee conduct via our online learning management software tool. In 2024, certain executive and supply chain personnel were provided with an additional training session that provided a broad overview of Modern Slavery issues and our role in opposing the use of child labour and forced labour.

Assessment of Effectiveness

NCSG plans to create a small internal working group comprised of individuals from various departments with the intention of having this internal working group assess our effectiveness by: (i) reviewing the organization's policies and procedures related to Modern Slavery; and (ii) considering the outcomes of any supplier audits or risk assessment processes that are currently under development.

Approval

This statement covers the period between January 1, 2023, to December 31, 2023, and has been approved by the sole shareholder of NCSG Leasing GP Corp.



Cranes, Inc.
Heather MacCallum
I have the authority to bind the entity.