

MCCOY GLOBAL INC. Suite 201, 9910 39th Ave NW, Edmonton, AB T6E 5H8 Canada

# INTELLIGENT PRODUCTIVITY SOLUTIONS.

# **Modern Slavery Report 2024**

## Introduction

McCoy Global Inc. is incorporated and domiciled in Canada, and is listed on the Toronto Stock Exchange ("TSX") under the symbol "MCB."

McCoy Global Inc. and its subsidiaries (collectively, "McCoy", "McCoy Global" and/or "the Corporation") is a leading provider of technologies and equipment designed to support tubular running operations, enhance wellbore integrity, and assist with collecting critical data for the global energy industry. McCoy Global's core products are used predominantly during the well construction phase for both land and offshore wells during both oil and gas exploration and development.

The Corporation is engaged in the following:

- design, production, and distribution of capital equipment to support tubular running operations, enhance wellbore integrity and to support capital equipment sales through aftermarket products and services such as technical support, consumables, and replacement parts;
- design, production, and distribution of data collection technologies used in rugged applications for the global energy industry as well as in construction, marine, nuclear and aerospace;
- repair, maintenance, and calibration of the Corporation's capital equipment and similar competitor products; and
- rental and subscription of the Corporation's products and technologies.

McCoy's vision is to redefine wellbore construction as the foremost global provider of innovative, automated tubular make-up technology with world class support.

As a responsible organization, McCoy Global Inc. must adhere to Canada's **Fighting Against Forced Labour and Child Labour in Supply Chains Act** ("the **Act**"), which came into force on January 1, 2024.

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# INTELLIGENT PRODUCTIVITY SOLUTIONS.

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## A. Structure, activities and supply chains:

### a. Structure

The following table provides a summary of the Corporation's principal operating entities as at December 31, 2023:

McCoy's Principal Operations in FY23					
Entity Name	Primary Product and Service Offerings	Number of employees (December 31, 2023)			
<b>McCoy Global USA, Inc.</b> Louisiana & Texas United States	Designs, develops, assembles, services, rents and distributes the Corporation's equipment and technology offerings	101			
<b>McCoy Global Inc.</b> Alberta Canada	Provides executive, strategic, operational, and financial management in addition to human resources, information technology and accounting support services	16			
<b>McCoy Global Canada Corp.</b> Alberta Canada	Services, rents, markets, distributes and supports the Corporation's equipment and technology offerings	nil			
<b>McCoy Global FZE</b> Jebel Ali Freezone, Dubai United Arab Emirates	Services, rents, markets, distributes and supports the Corporation's equipment and technology offerings	15			

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i. Legal structure, including legal classification:

The below exhibit summarizes the Corporation's legal entity structure and jurisdiction of corporate domicile.



### McCoy Global Inc.

McCoy was established in 1914 by Henry McCoy with the opening of a blacksmith shop in downtown Edmonton and has evolved into the parent company in a consolidated group of companies providing products, technologies, and services to the global energy industry. McCoy was incorporated in 1996, and completed its initial public offering in 1997 where the common shares of McCoy are listed on the Toronto Stock Exchange, and trade under the symbol (TSX:MCB). McCoy is based in Edmonton, Alberta, Canada and it is the ultimate parent company of the McCoy Group.

As the parent company of the McCoy Group, McCoy is responsible for the executive management, strategic planning, financial management, financing, information technology management, sales and marketing and human resources management of the group.

### McCoy Global USA, Inc.

McCoy Global USA, Inc. (McCoy USA), has physical locations in Broussard, Louisiana, and Cedar Park, Texas, and incorporated in 1983 as Superior Manufacturing and Hydraulics Inc. Superior Manufacturing and Hydraulics Inc. was acquired by McCoy Group during the third quarter of 2007, and was a leading manufacturer of hydraulic power tongs. The acquisition resulted in the McCoy Group becoming the world's leading OEM of this product line with a significant global presence in most types and size ranges of power tongs. The transaction included the acquisition of Precision Die Technologies, L.L.C. ("PDT"). PDT, also located in Broussard, was established in 2005 to manufacture dies and inserts for oil field tools such as

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slips, elevators and power tongs. PDT makes both conventional dies as well as patented grit faced dies which result in less damage to corrosion resistant tubulars. In 2013, Superior Manufacturing and Hydraulics Inc. was amalgamated with Precision Die Technologies LLC and changed its name to McCoy Global USA, Inc.

In January of 2017, McCoy USA acquired the assets of Cedar Park, Texas based 3PS Inc. (3PS). 3PS specialized in sensors, systems and services for heavy industry applications, including Torque and Tension Sub (TTS) technology. 3PS designs and engineers customized sensors and related systems for a variety of applications and industries including oil and gas, construction, marine, nuclear, and aerospace. 3PS's oil and gas products and services include an Iron Roughneck Torque Tester (IRTT) and the TTS. The acquisition positioned McCoy as a TTS global technology leader and contributed valuable design and engineering expertise for further development of data acquisition technologies.

In October 2019, McCoy USA acquired all of the outstanding units of DrawWorks LP ("DrawWorks") in order to further advance its strategic technology initiatives under the McCoy Group's Digital Technology Roadmap initiative and deliver enhanced solutions to our customers. DrawWorks designs, tests and sells tubular running technologies including a modular mechanically operated casing running tool (DWCRT<sup>™</sup>), and a patented line of mud handling equipment which includes the Autofill<sup>™</sup> Casing Equipment, AutoValve<sup>™</sup>, MudSaver valves and Single Joint Compensator (SJC<sup>™</sup>) System. McCoy USA integrated its data-driven technology platform with DrawWorks' equipment offerings and markets these to customers on a global basis. McCoy Group leveraged its existing global footprint to enable DrawWorks' products to reach new customers and markets under its globally recognized and respected McCoy brand. Shortly following close, the production of DrawWorks' technologies was fully integrated into McCoy USA's existing production facilities.

McCoy USA designs, develops, assembles, distributes, rents, markets and provides technical product support for the McCoy Group's product, service and technology offerings.

### McCoy Global FZE

McCoy Global Sarl incorporated in 2013, and was a 100 percent indirectly owned subsidiary of McCoy Global Inc. McCoy Global Sarl operated as a branch in the JAFZA, obtained its initial JAFZA business license in June of 2014, and commenced operations in JAFZA in December of 2014. In 2017, the McCoy Global UAE branch was incorporated as McCoy Global FZE (McCoy UAE), a 100% owned subsidiary of McCoy Global Inc., and McCoy Global Sarl was dissolved.

McCoy UAE services, rents, markets, distributes and supports the McCoy Group's equipment and technology offerings in the eastern hemisphere.

McCoy UAE procures the equipment and parts it distributes to its regional customers from McCoy USA. McCoy UAE also offers equipment servicing, repair, calibration and training for drilling and completions equipment.

#### McCoy Global Canada Corp.

McCoy Global Canada Corp was incorporated in 2011, and is a 100 percent directly owned subsidiary of McCoy Global Inc.

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McCoy Global Canada Corp. services, rents, markets, distributes and supports the McCoy's equipment and technology offerings.

McCoy Global Canada Corp procures the equipment and parts it distributes to its regional customers from McCoy Global USA, Inc. McCoy Global Canada Corp. also offers equipment servicing, repair, calibration and training for drilling and completions equipment.

ii. Organizational structure

The below exhibit depicts the Corporation's organizational structure and senior leadership with additional detail related to the organization's Purchasing & Supply Chain team. The Corporation employs a centralized business model, whereby senior leadership is responsible for their respective functional area across all McCoy operations globally.



With respect to supply chain and purchasing operations:

Among other responsibilities, the Director, Product Delivery, oversees the Group's supply chain and production functions including the following:

- Tactical and strategic supply chain management activities such as procurement of materials and vendor relationship management;
- Strategic decision making relating to sourcing and supplier management including setting the overall supply chain strategy and the guidelines/criteria for evaluating and selecting suitable suppliers;
- New supplier development when a component or material is not available within the existing supplier base; and;
- Material costs reduction management; and
- Drive a strong focus on high product quality and overall brand value enhancement.

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The supply chain and purchasing functions is further supported by the Manager, Supply Chain, who reports to the Director, Product Delivery, and who holds key supplier relationships and focuses on developing new supplier relationships across the US and Canada to identify efficiencies and reduce costs thereby increasing McCoy's competitiveness.

The supply chain and purchasing team includes approximately 7 individuals responsible for inventory control, purchasing, quality and expediting.

b. Supply chain and activities:

In 2018, McCoy fully transitioned to an outsource and assembly model for all of its product lines, with the exception of dies and inserts. All of McCoy's assembly and production activities are performed in the USA, at either the Corporation's Louisiana or Texas facility.

With respect to the production of its products and technologies other than dies and inserts, the Corporation relies on various key suppliers, primarily in the US and Canada. McCoy USA outsources key components and component parts, including but not limited to:

- Gears and other machined or fabricated McCoy OEM parts or assemblies;
- Electronics, cables, connectors, sensors and electronic circuit boards;
- Gauges, bearings, fittings, and fasteners;

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- Motors; and
- Hydraulic components.

Generally, McCoy suppliers source raw materials used in their production process from a variety of sources, including US steel mills, Chinese forging suppliers, as well as international wholesalers for COTS hardware and software product offerings.

McCoy USA then assembles, inspects, tests and sells the finished products and technologies either directly, or indirectly, through McCoy UAE and McCoy Canada, to end user customers or third party distributors.

With respect to the production of dies and inserts, McCoy sources steel bar stock from US steel mills, with the majority of their supply sourced from US origin recycled ore. McCoy USA then forms, mills and processes the steel bar stock into die and inserts. The dies and inserts are then sold either directly, or indirectly, through McCoy USA, McCoy UAE or McCoy Canada, to end user customers or third party distributors.

The table below sets out relative annual vendor spend by country of origin:

Country of Origin	Relative % of Annual Vendor Spend in 2023
United States	69%
Canada	30%
United Kingdom	1%
China	<1%
Other	<1%

The Corporation sells its products through: (i) direct sales channels utilizing an internal technical sales force; and (ii) agents, re-sellers, and distributors. The table below sets out the geographic distribution of revenue in 2023 and 2022. Revenue is attributed to a geographical region based

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on the location of the customer invoiced, which may not necessarily reflect the product's final destination.

Geographic Region (CDN\$ 000 except percentages)	2023	% of total	2022	% of total
United States & Latin America	38,741	<u>56%</u>	20,779	40%
Middle East & Africa	19,479	<b>28</b> %	22,817	44%
Europe	4,321	<b>6</b> %	3,403	6%
Asia Pacific	4,746	7%	4,847	<b>9</b> %
Canada	2,402	3%	582	1%
Total	69,689	100%	52,428	100%

The Corporation's foreign operations consist of subsidiaries located outside of Canada. Revenue invoiced from these foreign operations was 99% of the Corporation's consolidated revenues in 2023 (2022 – 97%).

The Corporation's property, plant, and equipment (PPE), intangible assets and goodwill are geographically located as follows:

Geographic Region	2023	2022
United States	81%	86%
United Arab Emirates	18%	12%
Canada	1%	2%

## B. Policies and due diligence process

a. Policy:

The Corporation's Policy for the Prevention of Forced Labour and Child Labour is attached hereto in Appendix I.

b. Due diligence process:

The Corporation adheres to a rigorous supplier qualification and monitoring program. While this program is not solely designed to reduce or prevent the risk of forced labour and child labour in its activities and supply chains, a number of elements carry dual purposes that assist with the detection and prevention of forced or child labour.

The Corporation's supply chain due diligence process incorporates the following activities:

i. Supplier pre-screening:

Before entering into any business relationship, the corporation conducts a thorough screening of potential suppliers. Supplier screenings are conducted using a risk-based approach. Factors like the supplier's location (for example, G8 countries are assessed as lower risk, while developing countries are considered higher risk), industry (for example, industries like software development are considered lower risk while industries such as mining are considered higher



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risk), size (large, well-established companies versus small, informal businesses), and previous compliance record are considered. Depending on the risk assessed, the supplier screening process may include:

- 1. Background Checks: The Corporation may review the supplier's history for any violations of labour laws or involvement in forced or child labour through the use of public databases and/or third-party databases.
- 2. Certifications: The Corporation may verify if the supplier has any certifications from recognized third parties that attest to their labour practices, such as Fair Trade or SA8000 certification.
- 3. References: Contacting previous clients of the supplier to inquire about their experiences and any potential issues.
- 4. Financial statements: Review of the supplier's annual financial statements to verify such things as profitability, as well as labour, wage, and salary expenses.
- 5. Certification of McCoy Supplier Questionnaire: In accordance with McCoy's Modern Slavery in Supply Chain Policy (Appendix I), all prospective contractors and suppliers, supplying products or services other than "COTS<sup>1</sup>" product offerings, as defined by the US Federal Acquisition Regulation 2.101, are required to complete and certify the Corporation's Modern Slavery Supplier Questionnaire.
- ii. Supplier audits, inspections, and site visits:

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The Corporation conducts annual audits, inspections and/or site visits of its keys suppliers to, among other objectives, verify compliance with McCoy's Modern Slavery in Supply Chain Policy. These activities may include:

- 1. On-site Inspections: Visiting the supplier's facilities to observe working conditions, interview workers, and/or review records.
- 2. Document Review: Reviewing the supplier's records, which may include the verification of such items as financial statements, workers' ages, working hours, and wage rates.

## C. Forced labour and child labour risks

a. Risk assessment:

The Corporation conducts a thorough risk assessment to identify potential risks of forced and child labour in its operations and supply chains. This involves:

i. Mapping the Corporation's supply chain and operations:

The Corporation conducts a supply chain mapping exercise on an annual basis, which involves thoroughly understanding the flow of goods, services, and information from the raw material stage to the end customer. The results of this mapping exercise are summarized in subsection A(b) above.

<sup>&</sup>lt;sup>1</sup> A software and/or hardware product that is commercially ready-made and available for sale, lease, or license to



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In addition, the Corporation conducts a review of its Human Resource Policies regarding employment practices.

ii. Assessing risk:

The Corporation considers the following factors when assessing risk in its Supply Chain:

1. Geographical risk:

Suppliers domiciled in countries where forced or child labour is more prevalent, such as certain regions in Asia or Africa, are considered higher risk. The Corporation uses tools such as the Global Slavery Index to assess geographical risk on a country by country basis.

As detailed in subsection A(b), substantially all of the Corporation's vendor spend is centered on products with country of origin of the USA, Canada, United Kingdom, Japan or China. Based on the Global Slavery Index, the prevalence of Modern Slavery in any of these countries is assessed at low.

2. Industry risk:

Certain industries, such as mining and manufacturing, are known to have a higher incidence of forced and child labour. A higher risk is attributed to products sourced from suppliers in these industries. The Corporation uses resources such as the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor to assess industry risk.

McCoy procures manufactured goods, many of which are comprised of steel and other metal ores. This elevates the risk of forced or child labour in McCoy's supply chain.

3. Supplier risk:

Suppliers who have had previous violations or other indications of past or present non-compliance to McCoy's Modern Slavery in Supply Chain policy or other legislative infractions are considered higher risk.

To date, McCoy has not identified any supplier risk specific to previous violations or other indications of non-compliance in its operation or supply chain.

The Corporation considers the following factors when assessing risk in its own operations:

1. Decentralization:

Employment and hiring practices, policies and processes that are managed locally or are inconsistent with McCoy's corporate policies creates a higher risk of child or forced labor occurring within McCoy's operations.

All of McCoy's hiring and payroll processes and policies are managed centrally by the Corporation's People & Culture department. Hiring practices at McCoy Global's

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foreign locations follow the same rigorous procedures as in Canada, while also ensuring that local labour and regulatory laws are followed.

#### b. Risk mitigation:

When a vendor or particular circumstance is identified as higher risk, the Corporation conducts more indepth due diligence procedures and increases the frequency of conducting such activities.

### **D.** Remediation measures

McCoy has assessed that its activities and supply chains do not carry a significant risk of forced or child labour being used, and accordingly the question of remediation is considered not applicable. To date, no instances of forced or child labour being utilized in McCoy's activities or supply chains has been identified and therefore, no measures have been taken to remediate forced labour or child labour in its activities and supply chains.

### E. Remediation of loss of income

McCoy has assessed that its activities and supply chains do not carry a significant risk of forced or child labour being used, and accordingly the question of remediation of loss of income is considered not applicable. To date, no instances of forced or child labour being utilized in McCoy's activities or supply chains has been identified and therefore, no measures have been taken to remediate loss of income due to forced labour or child labour in its activities and supply chains.

### F. Training

The Corporation conducts mandatory training on the topic of both forced labour and child labour, for those individuals with the authority to approve or suspend new and existing supplier relationships, those individuals with the authority to approve new employee hires and all individuals in an executive leadership role. The training is focused on the following topics and includes both formal and informal components:

- a. Legislative requirements;
- b. Definition, prevalence and general awareness of Modern Slavery;
- c. Requirements under McCoy's Modern Slavery in Supply Chain Policy; and
- d. How to identify, report and remediate Modern Slavery in McCoy's operations.

### G. Assessing effectiveness

While McCoy does not perform a formal effectiveness assessment, the research, preparation and review of this Modern Slavery Report is considered to be sufficient to address this requirement and assess the effectiveness of policies, processes and other actions taken to prevent and reduce risks of forced labour and child labour in its activities and supply chains.

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## H. 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 this Modern Slavery Report for McCoy Global Inc. 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 McCoy Global Inc.

Jim Rakievic, President & Chief Executive Officer May 29, 2024

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I have the authority to bind McCoy Global Inc.

Bing Deng, Chief Operating Officer May 29, 2024

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Appendix 1

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# INTELLIGENT PRODUCTIVITY SOLUTIONS.

#### Modern Slavery in Supply Chain Policy

#### A. Introduction

The Government of Canada has introduced new modern slavery legislation which came into force on January 1, 2024, namely the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9 (the "Act"). McCoy Global Inc. and its subsidiaries ("McCoy", "we", "our" and like phrases) stands firmly against Forced Labour and Child Labour (as such terms are defined below and are hereafter referred to together as "Modern Slavery") practices within our supply chain operations. In response to and in advancement of the objectives of the Act, McCoy has enacted this Modern Slavery in Supply Chain Policy (this "Policy"), which we are committed to rigorously enforcing and demanding strict compliance with by our employees and contractors, including those in joint ventures that we operate.

As McCoy unequivocally stands against all forms of Modern Slavery, through this Policy we are committed to continue exploring, introducing and enforcing new proactive measures to further prevent and reduce risks of Modern Slavery practices within our supply chain operations.

#### **Definition of Forced Labour And Child Labour**

In this Policy, the terms Forced Labour and Child Labour have the same meaning as in the Act:

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- (a) "Child Labour" means labour or services provided or offered to be provided by persons under the age of 18 years and that: (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada; (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999; and
- (b) "Forced Labour" means labour or service provided or offered to be provided by a person under circumstances that (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

#### **B. Leadership Responsibilities**

#### Approval

McCoy's Executive Officers ("Officers") manage McCoy's various governance policies, including this Policy. The Officers have management and oversight responsibilities for the approval, implementation, and periodic amendment of this Policy.

#### Implementation

McCoy's Chief Executive Officer (or their designate(s)) of McCoy will supervise and manage the implementation of this Policy into our supply chain operations.

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#### C. Key Principles

#### **Due Diligence**

As part of McCoy's commitment to promote and uphold the objectives of the Act and this Policy, we will conduct human rights diligence of our contractors and suppliers as it relates to Modern Slavery. As part of this diligence, all prospective contractors and suppliers, supplying products or services other than "**COTS**<sup>2</sup>" product offerings, as defined by the US Federal Acquisition Regulation 2.101, will be asked to complete the questionnaire attached hereto at Schedule "A" (the "**Supplier Questionnaire**").

#### Training

McCoy will provide education and training on the prevention of Modern Slavery to promote the objectives of the Act. This Policy and related training materials will be made available to all staff, and training for select staff working in higher-risk focus areas will be mandatory. McCoy will periodically update such education and training on the prevention of Modern Slavery as needed and provide annual refreshers to ensure the principles of this Policy, including any additional principles that may subsequently be added, are thoroughly communicated to all appropriate personnel within the organization.

#### Compliance

In addition to receiving satisfactory responses to the Supplier Questionnaire, McCoy will incorporate into its contractual documents with suppliers and contractors a compliance clause with respect to this Policy, to the effect of: "*The supplier and any of its related parties must not engage in activities associated with any form of modern slavery, which includes illegal child labour and exploitation, forced labour or human trafficking*."

We will actively encourage our suppliers and partners in joint ventures to apply the same principles as outlined in this Policy.

#### Annual Report

The Chief Executive Officer (or their designate) of McCoy will prepare an annual report (the "**Report**") discussing the steps the Company has taken during the previous financial year to prevent and reduce the risk of Modern Slavery at all steps of our importation and production of goods, in Canada or elsewhere. In particular, the Report will include a discussion of the elements required by section 11 of the Act.

The Report will be attested to by the Chief Executive Officer of McCoy.

Upon filing with Public Safety Canada, a copy of the Report will be published prominently on McCoy's website.

The Act and the reporting requirements contained therein are subject to change and parties responsible for preparing the Report should continually refresh themselves with the most recent guidance from the Government of Canada.

<sup>&</sup>lt;sup>2</sup> A software and/or hardware product that is commercially ready-made and available for sale, lease, or license to



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#### SCHEDULE "A"

### Form of Supplier Questionnaire

#### Supplier Name: \_

## \_\_\_\_\_ (hereinafter, "you", "your" or "Supplier")

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McCoy Global Inc. and its subsidiaries (the "Company") complies with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (also known as the "Modern Slavery Act"). The Company insists that its suppliers shall also ensure compliance with the Modern Slavery Act and shall adopt adequate procedures to eliminate and/or minimize the risk of forced labour and/or child labour in their supply chains.

Fighting Against Forced Labour and Child Labour in Supply Chains Act (justice.gc.ca)

 Is your product offering limited to COTS (Defined as "A software and/or hardware product that is commercially ready-made and available for sale, lease, or license to the general public.") Items? If you answer yes, you may defer completing the remaining sections of the questionnaire.

Yes No

2. Do you understand the laws pertaining to forced labour and child labour (as such terms are defined in the Modern Slavery Act) as applicable in Canada?

Yes \_\_\_\_\_ No \_\_\_\_\_

- 3. Are you required to report under the Modern Slavery Act (or similar legislation in any jurisdiction in which you operate)? If so, please attach a copy of your most recent annual report (or similar reporting) that you have filed with the applicable government authority.
- 4. Have you received, reviewed, and understood the Company's Forced and Child Labour in Supply Chain Policy?

Yes No

5. To the best of your knowledge, have you at any time within the past 12 months been in violation of the Company's Forced and Child Labour in Supply Chain Policy or the Modern Slavery Act (or similar legislation in any jurisdiction in which you operate)?

Yes No

If your answer to question 5 is "yes," please give full details.

6. To the best of your knowledge, have you implemented a policy for fighting forced labour and child labour in your organization and communicated to and trained relevant employees on such policy?

Yes	No	

7. To the best of your knowledge, is there forced labour or child labour in your supply chain?

Yes No

If your answer to question 7 is "yes", please give full details.

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Supplier's Name:

Signature:

I have the authority to bind the Supplier.

Name (please print):

Date:

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