



# CDN CONTROLS ULC

## MODERN SLAVERY REPORT to the GOVERNMENT of CANADA, 2025

(Submission for May 30, 2026)

### 1. Introduction

This report (the Report) is made by CDN Controls ULC (“CDN Controls” or “the Company” or “we” or “our”) pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) also referred to as the Canada Supply Chains Act. It constitutes our approach to prevent and reduce the risk of the use of forced labour and/or child labour in the Company’s supply chain for the financial year ending December 31, 2025 (“2025”).

During 2025, CDN Controls continued to build on approaches that we established in earlier reporting periods. Our focus during the year focused on maintaining oversight, making plans to advance policy documents and the integration of norms, and refinement of the practical measures through which expectations relating to forced labour and child labour are communicated within our organization and our supply chains. The 2026 reporting cycle is a year of prioritization, transparency, planned improvement and re-scoping to fully understand our path to compliance.

### 2. Steps to Prevent and Reduce the Risks of Forced Labour and Child Labour in 2025

The 2025 reporting year has been one of reflection for the company as we seek to understand how we are positioned to comply with the Canada Supply Chains Act now and in the future. We are also mindful that the Act itself is evolving in the light of the introduction of the harmonized reporting template and the release of other guidance by the Government of Canada.

CDN Controls took the following steps for the 2025 reporting period to prevent and reduce the risk of forced and/or child labour in our business and supply chains:

- Leadership continued to engage on the issues of forced labour and child labour through discussions with relevant internal stakeholders, including procurement, sustainability and operations personnel, regarding our obligations under the Act and the measures being taken to support compliance;
- We reinforced the foundational knowledge established through earlier third-party training and risk





assessment work, including use of those materials to support internal understanding of risk and reporting expectations;

- CDN engaged [Shift Critical International Ltd.](#), (a third-party provider recognized for expertise in this space), for advice, capacity-building and assistance with reporting. Our partnership helps to ensure that we meet our compliance obligations and that we are in alignment with leading practices in Supply Chains Act risk management;
- We undertook work to begin the review internal policy documents, including the Respectful Workplace policy and the Business Conduct policy, to ensure that relevant expectations relating to ethical conduct, reporting, and respectful treatment are reflected in our broader governance framework. These are intended to be finalized before the next reporting period.;
- CDN engaged with clients, customers and other stakeholders on issues that relate to forced labour and child labour risk and broader rights issues;
- With our partners [Shift Critical International Ltd.](#), throughout 2025, we committed to refreshing our knowledge and understanding of issues related to forced and child labour. We have also looked for opportunities to integrate these learnings into future approaches to risk management that demonstrate our commitment to compliance and continuous improvement;
- We continued to support our commitment to ethical business practices through ongoing business relationships and contractual interactions.

### 3. Corporate Structure, Business Operations and Supply Chains

#### Corporate Structure and Governance

CDN Controls was founded in March 2011, in Grande Prairie, Alberta. As of March 15, 2024, the Hoffman Family of Companies, a U.S.-based family-owned private equity firm, acquired a majority ownership stake in CDN Controls. The remaining minority ownership is held by a group comprising the company's founders and former owners.

The governance structure includes a Board of Directors comprised of two seats held by CDN Controls' cofounders, who are the current CEO and COO, and four seats from Hoffmann Family of Companies.





## Business Operations

CDN Controls is an energy services company of skilled tradespeople and is Western Canada’s leader in electrical and instrumentation maintenance, renewables/solar, industrial automation, fabrication, telecommunications, major projects, combustion and emissions reduction, and measurement.

CDN Controls operates 12 branches in Western Canada and has a U.S.-based entity operating under the name “CAVIS” (officially launched in 2025). All Canadian branch locations are reflected on the map shown below.

# 12 BRANCHES

### ALBERTA

- Brooks
- Calgary X2
- Edmonton
- Grande Cache
- Grande Prairie
- Valleyview
- Drumheller
- Medicine Hat
- Slave Lake



### BRITISH COLUMBIA

- Fort St. John
- Kitimat

## Supply Chain Management

The Act requires CDN Controls to report on activities related to the production, sale, and distribution of goods, both in and outside Canada, as well as the importation of goods into Canada. This includes describing the steps taken to prevent and reduce the risk of forced labour and child labour in our operations and throughout our supply chains.

CDN Controls procures goods and services from a range of third parties, with vendor awards issued in accordance with our policies and procedures. The majority of our suppliers are based in North America and, because we continue to rely on a consistent core group of suppliers for most procurement needs, our supply chain demographic and supplier list has remained relatively stable from year to year.





We focus on safe, cost-effective and innovative solutions, excellent service delivery and maximizing economic benefits and employment in the communities where we operate.

## Policies

In response to the Act, in 2023/2024 we conducted a comprehensive risk assessment of our supply chain through an independent third-party advisor, [Shift Critical International Ltd.](#), The results of this assessment were submitted in the May 2024 CDN Controls ULC Report to Government.

This work also included supply chain mapping, internal assessment activity, supplier engagement, and the development of an action plan to support implementation of the Act's requirements. The results of this assessment informed our initial reporting and continues to support our understanding of inherent and residual risk within our supply chain.

The priority for 2026 is to assess our current policy framework for gaps with respect to forced labour and child labour and incorporate language that addresses this issue within internal policy documents. This work includes ongoing review of the Respectful Workplace policy and the Business Conduct policy, as well as continued attention to the manner in which expectations may be reflected in onboarding, contractor documentation, and related governance materials.

We will also continue to consider the design and implementation of a potential Supplier Code of Conduct to ensure that our expectations of suppliers and their compliance with the Act are fully understood and implemented. We regard our suppliers as our partners in helping to address these issues and engage them with this in mind.

## 4. Due Diligence: Steps Taken to Assess and Manage the Risks

In 2025, CDN Controls dedicated resources to better understanding our role, the scope of the Act and those areas where we can have most influence given the circumstances of our business and our supply chain. We did this through:

- **Leadership Engagement:** We continued internal discussions with Executive and Senior Leadership, and Procurement Managers to ensure that they are informed and updated with respect to compliance obligations and that forced labour and child labour risks are being managed appropriately. This allows Leadership to discharge their duty of oversight effectively.





- Employee and Leadership Training in Forced and Child Labour Risk: We continue to rely on the awareness established through prior mandatory training delivered by an independent third-party provider, [Shift Critical International Ltd.](#), and we use those materials to support internal understanding of legal obligations, risk indicators, risk management and reporting.
- Policy and Process Development: We have continued reviewing our due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chains, including consideration of how these expectations may be reflected in the Respectful Workplace policy and the Business Conduct policy, once updated;
- Stakeholder Engagement: We have continued to engage with supply chain partners — both within our own supply chain and, as a member of our clients’ supply chains. Many of our clients have requested a copy of this report as part of their procurement process and due diligence.
- External Collaboration: As in previous reporting years, we have actively engaged with subject matter experts and other key stakeholders to better understand our supply chain risks and strengthen our response. We strive to use knowledge from these conversations to better inform our approach to forced and child labour risk; and
- Transparent Reporting: We will continue to compile and submit our report to government and responses to the government questionnaire which we are submitting here in compliance with the Act.

Building on our learnings from previous reporting years and our increased understanding of our supply chain, we anticipate the following work in 2026. While most of these measures are on-going from 2025, we believe that we cannot consider new areas of focus without first completing this work.

- Ongoing Policy Review: CDN Controls is conducting a review of our current policy framework including our Respectful Workplace policy and the Business Conduct policy to identify and address gaps related to forced labour and child labour. This work includes our contractor on-boarding process to ensure that our suppliers recognize the shared responsibility we have for addressing forced and child labour risk;
- Ongoing Training: In 2026, we will consider if there is a need to extend the training program to provide awareness to all of those working in the supply chain and related support functions and potentially extending this to key suppliers.
- Promoting Strong Governance: CDN Controls will lead by example and will continue to exercise strong governance practices over our business and supply chains. Best practice suggests that we work with suppliers to resolve issues; we will use our policy and contractual instruments to promote and facilitate information exchange with suppliers about forced and child labour in a helpful and supportive way ; and





- **Ongoing Risk Assessment:** For 2025, we have not had any significant changes to our supply chain since our previous risk assessment. In that assessment, our risk profile was defined by a recognized third-party advisor ([Shift Critical International Ltd.](#)) as low. When our current work on policy review is complete, we will consider the need for a future risk assessment after any revisions to policy have been implemented and there has been time for suppliers to review, incorporate and implement any resulting changes in the associated expectations.

## 5. Forced Labour and Child Labour Risk

Based on learnings from our previous supply chain evaluation, risk continues to be characterized in several ways:

- **Inherent risk:** Accrues from the types of products, locations and industrial sectors that have a strong association with forced labour and child labour.
- **Non-inherent risk:** Differs from inherent risk in that it accrues from things over which individual corporations have greater control; for example, adopting a policy, administering staff training or conducting a risk assessment.
- **Direct risk:** Risk that a CDN Controls Tier 1 supplier carries as a result of its own operations.
- **Indirect Risk:** Risk that a CDN Controls Tier 1 supplier carries as a result of its own supply chain. These suppliers will be CDN Controls' Tier 2 suppliers and extends risk assessment further across the supply chain.

In our previous risk assessment, our supply chain risk of forced and child labour use was characterized as very low. Given that we have seen no significant change to our supply chain or the structure of our business, we believe that this ranking remains unchanged.

Inherent risk had been identified in the previous assessment among a few suppliers associated with oil and gas products, metals, minerals usage and industrial equipment. However, all of these suppliers have previously declared that they have a process in place for assessing their own risk and robust processes for managing these risks. We are not aware of any changes to the inherent risk profile of these suppliers, but we do make it clear that we expect risks to be managed and communicated.

Importantly, no supplier has actively declared to us instances of forced labour or child labour in their operations or supply chains. We are committed to ongoing evaluation and monitoring to ensure our supply chain risk continues to be effectively managed and to remain low.





## 6. Remediation

As instances of forced labour or child labour have not been identified within our own operations, among our suppliers or within their respective supply chains, remediation measures are currently not required.

## 7. Remediation for Loss of Income

As instances of forced labour or child labour have not identified in our own operations, among our suppliers or within their respective supply chains, remediation measures for loss of income are not required.

## 8. Training

In 2024 CDN Controls delivered mandatory training to the Executive and Senior Leadership Teams and to Procurement Managers. This training was designed and facilitated by an external third-party partner, [Shift Critical International Ltd.](#) The training was led by experienced practitioners versed in the requirements of the Act and global best practices for assessing and managing such human rights risk.

This training ensures staff understand the significance of the Act, our corporate responsibilities under its requirements, and how to identify and respond to potential signs or instances of forced labour or child labour. Importantly, members of the Board of Directors and Senior Leadership Team were provided with training designed specifically to emphasize their roles, and the fiduciary duty to manage the risk and to ensure that the Company is compliant with the Act.

The training session was provided both in-person and virtually and details of the topics included have been provided in previous year's reports.

Going forward, we are considering if there is a need to renew and expand this training to a greater proportion of the workforce at CDN.





## 9. Acting on the findings of our Risk Assessment

Following our earlier risk assessment, it was determined that our supply chain risk of forced labour and child labour use is low. Our focus during 2026 remains on maintaining oversight, applying prior findings to current supplier relationships, and advancing governance measures that support continued monitoring and awareness. These include;

- Policy and governance review: As mentioned previously, there is ongoing review of our policy framework to ensure that it includes appropriate references to child labour and forced labour. If, after review, any significant gaps are identified, these will be addressed and suppliers will be made aware of any changes that affect the way we partner, or our expectations of suppliers.
- Engaging suppliers: We will consider the need to issue more robust guidance to suppliers in the form of a one or two-page document explaining what the Canada Supply Chains Act entails and the obligations it generates. Additionally, we believe it is important to also understand what to do if instances of forced or child labour are suspected in the supply chain and this guidance would be included in the document. This development of this guidance document is contingent on the completion of our policy review to ensure that all instruments are aligned and use consistent language.
- Promoting strong governance among suppliers: The Canada Supply Chains Act is intended to foster risk management across the supply chain and to the lower levels beyond Tier 1 where most abuses occur. In this respect, we will encourage suppliers to adopt strong governance and oversight of their own operations and supply chains as a way to ensure, to the degree possible, that suppliers are assessing their own supply chains for risk.
- Policy acknowledgement: We recognize that we can also bring attention to these issues within our policies and contractual documents, such as our 'terms and conditions,' and 'master service agreements.' In turn, we are considering how acknowledgement of these expectations may be better incorporated into contractor and supplier processes.

As part of our ongoing work, CDN Controls considers relevant external guidance, peer practice, and developments in responsible business conduct expectations when reviewing its approach. This helps to ensure that our actions remain aligned with legal requirements and are informed by evolving industry practice, while reflecting the specific risk profile of our operations and supply chains.





## 10. Our Approach to Remediation

During 2025 we did not encounter any situations where remediation was necessary; this mirrors the situation seen in our supply chain in 2024 and 2023. CDN Controls has taken measures to limit the risk of forced labour or child labour use within our supply chain including risk assessment, training, policy review and the adoption of strong governance measures.

We actively encourage all employees, contractors, and consultants who are performing work for the Company, and other stakeholders who are impacted by our business, to speak up and promptly raise any potential violations or concerns they may encounter.

## 11. Assessing the Effectiveness of Our Actions

In accordance with the requirements of the Act, we exercise oversight to assess the effectiveness of our forced labour and child labour risk management approach, and we adopt measures to make us more effective in assessing and managing these risks. Measures include:

- Appraising members of our Board of Directors and the Executive and Senior Leadership Teams of all actions taken to identify and mitigate forced labour and child labour risk, including any risks or instances that were previously undisclosed;
- Partnering with an external advisory organization which performs an independent review of our actions, offers expert guidance and proposes courses of action for risk assessment, evaluation and response, as well as the training which builds our capacity to deliver on our commitments.
- In partnership with our advisory firm, we review the Act at regular intervals. Additionally, we review any renewed guidance issued by the Government of Canada and Public Safety Canada's Annual Report to Parliament. These documents are intended to clarify the meaning of, and obligations created by, the Act. We review these disclosures for anything that might impact the way we assess and monitor risk;
- We have committed to supply chain risk assessment on the basis of our annual review which will determine what changes have taken place in the supply chain, or our business that may impact the risk profile. We also review our policies, practices and approaches on an ongoing basis in line with leading recommendations;
- We actively encourage and promote responsible approaches to risk management through engaging with suppliers, and through surveys and ongoing communications; and





- Since the Act came into force in January 2024, we have implemented enhanced due diligence measures based on the advice of an independent third-party service provider as we endeavor to ensure that our practices keep pace with evolutions in the Act.

In evaluating the effectiveness of the measures we adopt, we also consider how our approach aligns with available guidance and emerging industry practice on forced and child labour risk management, and we use this perspective to identify opportunities for further strengthening our governance framework over time.

## 12. Looking Forward

CDN Controls, the Board, Executive Leadership, Supply Chain Managers and employees recognize and support Canada’s international commitment to contribute to the fight against forced labour and child labour in supply chains.

We will continue to build risk management approaches, take supportive action and promote transparent annual reporting in response to the Act. Based on the experience we have gained through the process in 2023 and 2024 we are also committed to;

- Reporting: Pursuant to the Act, we will compile an annual report on our efforts to support Canada’s commitment to the fight against forced labour and child labour risk in supply chains. We will verify that this report is based on our best and honest understanding of our risk, and will work with our advisory partner to maintain this commitment.
- Regular risk assessment process: We are committed to tracking changes in our supply chain on an on-going basis and using this assessment to determine whether we should conduct a full supply chain risk assessment in any particular year;
- Policy Review and Enhancement: We will continue to conduct a thorough review of our current policy framework and contractor on-boarding process, to identify and address any gaps related to forced labour and child labour. It is intended that this review will have a cascading effect with suppliers, as we emphasize the shared nature of responsibility and response to the requirements of the Act; we believe that this will strengthen engagement with our suppliers and make our supply chain more robust in the face of these risks.
- Commitment to transparent communications: We will publish our annual report on CDN’s website outlining the steps we have taken to reduce and mitigate forced and child labour risk, and to promote transparency and accountability within our supply chain. We are committed to honest and open communications around these and other risk issues in the interests of our employees, stakeholders, communities with whom we work, partners and others with whom we interact;





- Ongoing Training: We will consider the need to fully extend our training and awareness programs to all those that have a role in managing forced and child labour risk; and
- Promoting Strong Governance: We actively promote strong governance practices regarding forced and child labour among our suppliers and lead by example in adopting strong governance in our own operations.

We will continue to monitor regulatory developments, external guidance and emerging industry expectations relating to forced labour and child labour in supply chains and will take these into account when refining our policies, due diligence activities and reporting.

### 13. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of CDN Controls.

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. 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 2024.

I have the authority to bind CDN Controls.

Full name: Dean Fraser

Title: CEO, Officer of the Company

Date: May 28, 2026.

