

## **Cavalier Tool & Manufacturing Ltd.**

**BILL S-211**

**2024 Report**

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## **Introduction**

The following report has been drafted by Cavalier Tool & Manufacturing Ltd. in alignment with section 11 of Bill S-211 for the financial year ending November 30<sup>th</sup>, 2024. The entity covered by this report is Cavalier Tool & Manufacturing Ltd. (Business Number: 100846609).

Cavalier Tool & Manufacturing Ltd. satisfies the requirement of being a reporting entity under the act by having a place of business in Canada, doing business in Canada, and having assets in Canada. In addition, Cavalier Tool & Manufacturing Ltd. meets two out of the three size-related thresholds for revenue as well as for importing and distributing goods.

Cavalier Tool & Manufacturing Ltd. emphasizes its dedication to transparency, honesty, and integrity in all supply chain and operating activities. Compliant with Bill S-211, this report outlines and details the steps taken by Cavalier Tool & Manufacturing Ltd. to manage and mitigate potential risks related to child labour and forced labour within its operations.

## **Section A: Structure, Activities, and Supply Chains**

Cavalier Tool & Manufacturing Ltd. is headquartered in Ontario, Canada. The company specializes in the production of mid- to large-sized molds, servicing automotive, commercial, recreational, and agricultural sectors. Cavalier maintains three manufacturing facilities in Canada and three design offices in India.

Products and services are sourced through direct and indirect suppliers located in Canada, the United States and China. In India, Cavalier Tool maintains oversight over its operations and hiring processes, with no local manufacturing activities.

## **Section B: Policies and Due Diligence Processes**

At Cavalier, upholding ethical standards across our operations and supply chain is a foundational principle. Our commitment to ethical conduct, in tandem with our focus on fostering strong vendor relationships, serves as a preventative measure against potential risks such as forced or child labour and other unethical practices within our operational and supply networks.

During the previous fiscal year, Cavalier Tool did not have a dedicated policy specific to forced labour or child labour. However, internal discussions have taken place to increase awareness of Bill S-211 requirements amongst the purchasing staff. As part of its regular supply chain operations, the



company conducts site visits to selected supplier locations in China, India, and the United States.

These visits enhance the company's understanding of supplier practices and operations.

Cavalier Tool & Manufacturing Ltd. is committed to maintaining moral standards throughout our operations and supply chain. Our focus on ethical business conduct, in combination with building trustworthy supplier relationships, provides inherent protection against the risks of forced or child labour and other unethical practices within our operating activities and supply chain.

## **Section C - Forced Labour and Child Labour Risks**

To identify and evaluate the risks of forced and child labour within our supply chains, we recently conducted a meticulous risk assessment utilizing insights drawn from the Walk Free Global Slavery Index, the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct, and the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

This risk assessment does not assume the presence of forced or child labour within our operations or supply chains; instead, it seeks to identify potential situations where such risks could arise, enabling Cavalier Tool & Manufacturing Ltd. to implement effective preventive measures. Our assessment acknowledges the widespread threat of forced and child labour across industries and recognizes vulnerabilities within specific sectors of our supply chain, particularly in regions with less stringent regulatory frameworks and enforcement mechanisms.

The analysis directed attention to specific geographic areas identified by the Walk Free Global Slavery Index and other authoritative references as having an increased likelihood of forced and child labour occurrences. This assessment of geographic risk was bolstered by an evaluation of product categories considered to be at risk, thereby enhancing the accuracy of our risk assessment process.

### **Risk Assessment Findings**

Through the geographical risk analysis from the available supply expenditure in the previous fiscal year, Cavalier Tool & Manufacturing Ltd. identified its direct suppliers as being located in three countries — Canada, United States, and China. Imports from United States suppliers accounted for a majority of our supply expenditures followed by Canada and China. All reviewed countries within our import portfolio present a low risk of the potential prevalence of modern slavery, according to the

Walk Free Global Slavery Index. The exercise was conducted on information that was best available for scrutiny at the time of the assessment, and Cavalier understands that the proportion of expenditure by country can change as we work together with our suppliers to gather more information on sourcing for transparency and compliance. We no less, wish to consider these risks seriously. India remains a design-only location under Cavalier's full control, with no manufacturing or procurement taking place locally.

In addition, we analyzed data sourced from the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour. This assessment plays a critical role in pinpointing particular items within our imported goods that could be vulnerable to forced or child labour. Following a comparison of this data with our reviewed imported products, we found no indications suggesting an increased likelihood of association with forced or child labour practices.

In summary, our risk assessment findings suggest a low level of exposure to forced and child labour risks within our supply chain relative to total expenditures. However, this does not diminish our commitment to effectively identifying and managing risks through our risk management protocols and policies.

## **Section D - Remediation Measures**

In the previous fiscal year, there were no identified instances of forced labour or child labour within our supply chain and operating activities, thus no remediation measures were necessary or implemented.

Looking ahead, we will work closely with our suppliers to strengthen our ability to detect any occurrences of forced or child labour within our operations or supply chains and implement necessary remedial actions as appropriate.

## **Section E - Remediation of Loss of Income**

In the previous fiscal year, no instances of forced or child labour have been identified within our operations or supply chains. As a result, no measures have been implemented to address income loss among vulnerable communities.

## **Section F - Training**

In the previous fiscal year, although no formal training program was instituted, discussions around Bill S-211 and its implications were conducted in procurement and executive team meetings. These



internal discussions served to raise awareness about forced and child labour and the responsibilities of Cavalier Tool under the Act.

## Section G - Assessing Effectiveness

While we previously did not have specific formalized policies and procedures for assessing the effectiveness of preventing forced labour and child labour in our operations and supply chains, our commitment to implementing more robust measures remains steadfast. Cavalier Tool has taken proactive steps such as site visits and internal awareness discussions to engage meaningfully with supply chain partners. We are prepared to enhance our approach should concerns arise or as industry standards evolve.

## 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.

Full Name: Brian Bendig  
Title: President  
Date: May 20 / 25  
Signature: Brian Bendig  
\* "I have the authority to bind 'Cavalier Tool & Manufacturing Ltd.'"