



BILL S-211

Modern Slavery Statement for the Financial Year ended in October 2023

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by **Stang Holdings Inc** to identify and address the risks of forced labor and child labor in its business operations and supply chains during the financial year commencing November 1, 2022 and ending October 31, 2023.

Group Structure

Stang Holdings Inc was established in 2002 and operates under the business name **Stang Holdings Inc** with its head office in Newmarket, Ontario. The group consists of Gin-Cor Industries Inc operating in Mattawa, Ontario, and Drivetec Manufacturing Ltd operating in Oshawa, Ontario.



Supply Chain

Our supply chain is based mainly within North America. Some products are directly sourced and imported from EU, Turkey, India, and the Far East.

Risks in Supply Chain

While we haven't taken any action to identify any risks within our supply chain during the reported year, we are committed to respecting human rights and ensuring that forced labor and child labor are not a part of our supply chain in the future.

Actions Taken

While we haven't taken any action during the reported year, **Stang Holdings Inc** is committed to identifying the risks by implementing a Social Responsibility Questionnaire, as part of the new suppliers' onboarding process, as well as collecting information from our existing sources.



Risk Assessment

While we haven't taken any action during the reported year, as mentioned above, we are planning to implement the Social Responsibility Questionnaire and further investigate if any risk has been identified. i.e. work towards de-sourcing vendors where risk has been identified.

Remediation

In case of risk identification within any part of our supply chain and given there is enough evidence **Stang Holdings Inc** will disassociate itself from the source of risk. **Stang Holdings Inc** will seek guidance from Public Safety Canada on further steps in this case.

Training

We're in the process of creating an employee policy, training, and acknowledgment of understanding for all employees relating to the identification and mitigation of any forced labor practices. This will be put in place by the end of 2025.

Effectiveness of Assessment



As we develop our new policy, we will incorporate an effective assessment mechanism to follow and implement by our management team, and within our supply chain.

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.

Luc Stang

Luc Stang,
President and CEO of Stang Holdings Inc.
Date: May 30, 2024