

FINNING 2023

JOINT MODERN SLAVERY REPORT

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A. ABOUT THIS REPORT

This Joint Modern Slavery Report is made in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) for the reporting period of January 1, 2023 to December 31, 2023. Finning International Inc. (Finning International) has prepared this Report in conjunction with its wholly owned subsidiaries OEM Remanufacturing Company Inc. (OEM) and 4Refuel Canada LP (4Refuel), as these subsidiaries are reporting entities under the Act. In Canada, Finning International operates through our Finning (Canada) division. In this Report, any reference to "Finning", "we" or "us" is a collective reference to Finning (Canada), OEM and 4Refuel, unless stated otherwise. Discussions of our supply chain in this Report are limited to our Canadian supply chain.

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B. MESSAGE TO SHAREHOLDERS

We recognize that modern slavery, including forced labour and child labour, is a complex issue that can exist in a variety of ways in global supply chains. For ninety years, our purpose has been to deliver outstanding service and solutions, while working safely to ensure we take care of the people and places around us. Importantly, delivering on this purpose includes working with our suppliers such that together we are doing business in a way that supports our communities and does not harm or exploit vulnerable individuals.

This Report describes Finning's approach to conducting our business in a way that seeks to minimize modern slavery risks in our supply chain and the steps we took in 2023 in support of this objective.

We have and continue to develop processes and procedures to prevent and reduce the risk of modern slavery in our supply chain. We also recognize that significant work needs to be done by companies globally to address this issue in a meaningful way.

This Joint Modern Slavery Report was approved by the Board of Directors of each of Finning International and OEM, and by 4Refuel, by the Board of Directors of 4Refuel GP Corporation in its capacity as the general partner of 4Refuel. In accordance with the requirements of the Act, and in particular section 11 of the Act, I attest that I have reviewed the information contained in this Report for all three Finning entities that are subject to the Act. 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 our financial year ended December 31, 2023. I have the authority to bind Finning International, OEM and 4Refuel.

/s/ Kevin Parkes

Kevin Parkes
President and Chief Executive Officer
March 14, 2024



C. OUR STRUCTURE, ACTIVITIES AND CANADIAN SUPPLY CHAIN

Finning International is a global corporation with its head office in Surrey, British Columbia, Canada. We are the world's largest dealer of Caterpillar® products and we are the authorized dealer of Caterpillar products in Western and part of Northern Canada, the United Kingdom, the Republic of Ireland, and the Southern Cone of South America (Chile, Argentina, and Bolivia). On December 31, 2023, we had approximately 14,922 employees worldwide.

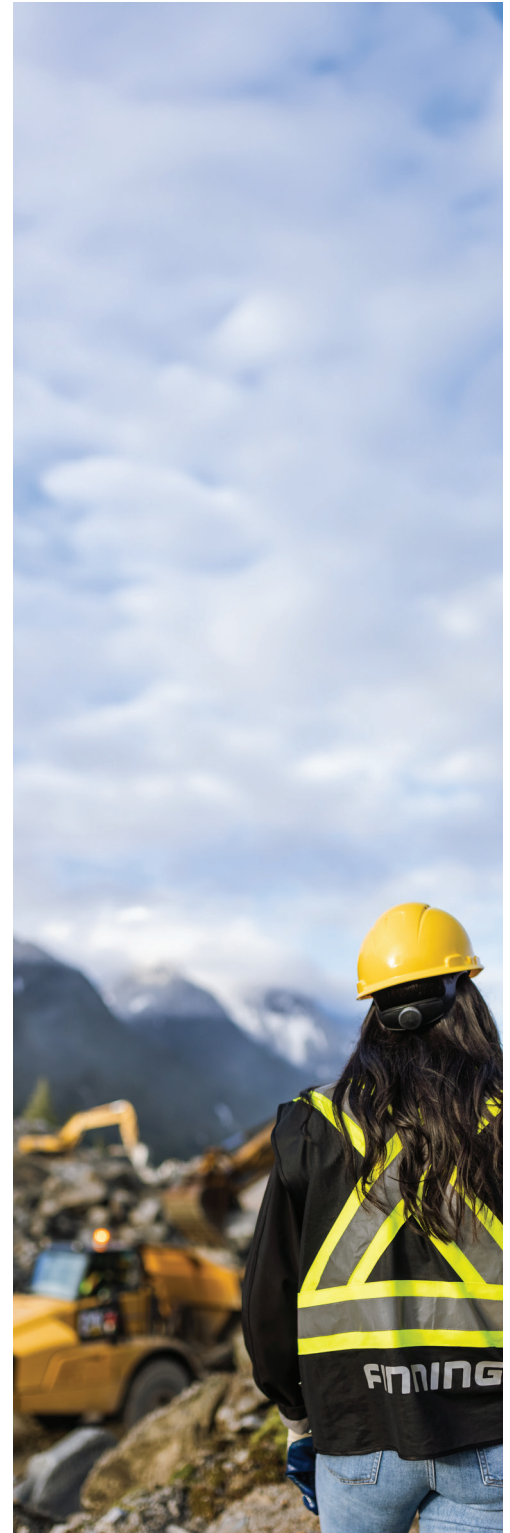
Our principal business is to provide sales, rentals, parts, services, and performance solutions for Caterpillar equipment and engines and complementary equipment with all such equipment and parts generally being imported from abroad. Our product support infrastructure and service capabilities deliver solutions that help customers to lower their overall cost of ownership while maximizing productivity.

We also provide remanufacturing and component exchange services in Canada through our wholly owned subsidiary, OEM. OEM is one of North America's most advanced heavy-equipment engine and powertrain component remanufacturing companies, serving the resource, construction, energy and transportation industries.

Our industrial refuelling service company, 4Refuel, operates across Canada and also operates, through 4Refuel US LLC, in the United States in Texas, and serves customers in construction, transportation, oil and gas, power generation and other industrial sectors. 4Refuel complements our equipment business by helping customers improve the physical availability of their equipment and the productivity of their operations.

As a Caterpillar dealer, Caterpillar is by far our largest supply partner, comprising a large majority of our annual expenditures on third parties. Caterpillar manufactures equipment, engines and parts in every region in the world to support their global customers and dealers.

Outside of Caterpillar, our main suppliers provide goods and services, such as personal protective equipment, shop consumables, transportation and logistic services, machine attachments, ancillary equipment, fuel, refuelling trucks, office supplies and equipment, facilities services, IT services and professional services.



D. HUMAN RIGHTS AT FINNING



Finning is committed to respecting human rights throughout our operations as noted in our Code of Conduct. This respect for human rights is informed by the United Nations Declaration of Human Rights (UNDHR), the International Labor Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work, employment laws in any region where we operate, and applicable legislation protecting human rights.

Consistent with our commitment to human rights and in accordance with applicable law and practice, we reject and support the elimination of all forms of modern slavery in the workplace including forced labour and child labour.

RESPECT, INCLUSION AND DIVERSITY

We are committed to building safe, talented, and inclusive teams at Finning, where diverse perspectives are respected and valued. To promote an inclusive culture and protect the physical and psychological safety of our employees, we are committed to ensuring that all individuals enjoy respect and dignity in a safe environment, free from discrimination, bullying, harassment or workplace violence. We also seek to ensure everyone feels safe, valued and a sense of belonging, so that they will have courage to speak up with innovative ideas and intervene if they observe inappropriate behaviours that undermine our culture and strategy, including but not limited to any concerns regarding modern slavery whether internal or external. We have several policies that support these commitments, including our:

- Code of Conduct
- Global Respect, Inclusion and Diversity Policy
- Global Anti-Bribery and Anti-Corruption Policy
- Global Political Contributions Policy
- Corporate Disclosure Policy
- Share Trading, Hedging and Use of Material Information Policy
- Whistleblower Policy
- Global Sustainability Policy

E. MODERN SLAVERY AND OUR SUPPLY CHAIN

CATERPILLAR®

As a Caterpillar dealer, the majority of our operations and business is the sale and service of Caterpillar equipment and parts. We value our long-standing relationship with Caterpillar and our shared commitment to respecting human rights throughout our respective operations. We understand that Caterpillar believes the risk of modern slavery is low in its operations and those of its direct suppliers. This is due in part to the controls and standards Caterpillar has in place, which include:

- **Supplier Standards:** Caterpillar views their suppliers as an important part of their extended value chain. Caterpillar is committed to working with its suppliers to uphold Caterpillar's corporate values, Supplier Code of Conduct, Human Rights Policy and Slavery and Human Trafficking Statement.
- **Supplier Accountability:** If Caterpillar becomes aware of any actions or conditions within its supply chain that are not in compliance with Caterpillar's Supplier Code of Conduct, Caterpillar's expectation is that the supplier implement corrective measures. A supplier's continued noncompliance may lead to additional actions, up to and including termination of the business relationship.
- **Supplier Self-Assessment:** Major Caterpillar suppliers are instructed to complete a self assessment which includes questions regarding the policies and procedures such suppliers have in place to address modern slavery issues in their respective supply chains. Caterpillar uses assessment response data to address supply chain risk through a collaborative approach with responding suppliers.
- **Caterpillar Operations:** Caterpillar has robust, documented human resources processes and standards across its enterprise to ensure that its employees around the world are compensated and managed in accordance with applicable laws. Subject to applicable local law, many of those processes and standards are set at a global or regional, rather than local, level to ensure transparency and consistent treatment. These processes and standards are supported by internal human resources and legal teams located around the world.
- **Policies and Training:** All Caterpillar employees are required to complete Caterpillar Code of Conduct training on an annual basis. This training includes a certification by

each employee that they are not aware of any activities (including human rights issues) that violate the Caterpillar Code of Conduct. Additionally, Caterpillar's Human Rights Policy and its Slavery and Human Trafficking Statement are disseminated through internal communications to Caterpillar's subsidiaries and joint ventures to ensure company wide awareness.

OTHER SUPPLIERS

Finning's non-Caterpillar sourcing is from reputable, top tier organizations based primarily in Canada and the United States. As a result, we believe the risk of modern slavery in the operations of our direct suppliers to be low. In 2023, we did not identify any forced labour or child labour in our supply chain and therefore did not implement any remediation measures. We recognize that the risks of modern slavery may vary and increase through our suppliers' supply chains, depending on the industry and countries in which their suppliers operate and have engaged in a risk assessment of our non-Caterpillar suppliers, as discussed in more detail in section F of this report. We are prepared to demand corrective action from suppliers if we identify any modern slavery concerns.

SUPPLIER CODE OF CONDUCT

All Finning (Canada) and OEM suppliers are asked to agree to our global Supplier Code of Conduct which requires, among other things, suppliers to conduct their operations ethically and without contravention of human rights legislation and conventions. In 2023, we updated our Supplier Code of Conduct such that it calls out in greater detail our expectation that suppliers conduct their business ethically and without contravention of human rights legislation or conventions. Notably, we expect that:

- All work performed on a supplier's behalf is undertaken voluntarily and is not forced; and
- Our suppliers, at minimum, abide by local child labour laws and align their practices with the fundamental labour standards outlined by the ILO in Convention No. 138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labour. Children must be protected from harm, have access to education, and should be free to attend school before they enter the workforce.

Additionally, our Supplier Code of Conduct requires that suppliers compensate their workers in accordance with applicable employment laws, including those pertaining to minimum wages, working conditions, overtime hours, and legally mandated benefits. In cases where no specific employment laws exist, workers should be remunerated fairly and at least at the minimum industry standard in the local area. Suppliers are expected to regularly review worker compensation to evaluate whether workers earn enough to meet their basic needs and the needs of their family to disincentivize the need for such workers to resort to child labour or forced labour to supplement family income.

If we become aware of any actions or conditions in our supply chain that do not align with our Supplier Code of Conduct, we retain the right to demand corrective actions from the supplier. Non-compliance by a supplier may result in further actions by Finning, including the termination of our business relationship.

4Refuel has approved and adopted our Supplier Code of Conduct and will be rolling it out to its existing suppliers and any new suppliers starting in 2024.



F. OTHER ACTIONS TAKEN IN 2023

In 2023, we assessed our current state in respect of possible modern slavery issues within our supply chain. Through this assessment, we believe that the risk that we are responsible for directly causing modern slavery is low. We pride ourselves in maintaining high ethical standards in our dealings with suppliers and are committed to avoiding any actions that might encourage

or indirectly support modern slavery practices, such as through exerting unconscionable commercial pressure or imposing unfavourable contractual terms and conditions. Our assessment also led us to take a number of actions, as set out in this section.

SUPPLIER RISK ASSESSMENT

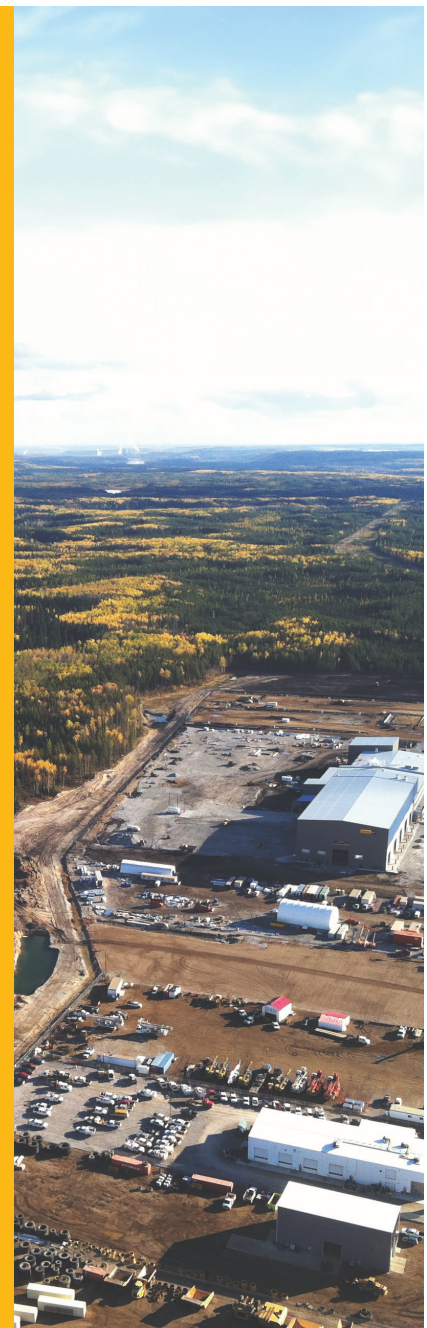
We conducted a risk assessment of Finning (Canada), OEM and 4Refuel's non-Caterpillar® supplier base and identified two potentially higher risk supplier groups – garment and glove suppliers and electronics suppliers. We engaged with our largest garment and glove suppliers and electronic suppliers on modern slavery risks within their respective supply chains through an initial questionnaire and follow-ups where necessary. This process allowed us to get a clearer understanding of our supply chain in these higher risk segments while also bringing the issue of modern slavery to the forefront of these suppliers' minds, ensuring they are aware of our expectations and remain committed to strengthening their knowledge and capabilities in this area. We plan on continuing our discussions with our higher risk suppliers into 2024.

ENHANCED DUE DILIGENCE

Our procurement team has a robust vetting and due diligence process in place in respect of new suppliers. In 2023, we modified our RFP process at Finning (Canada), OEM and 4Refuel so that we now ask potential suppliers what steps they take to combat modern slavery risks within their supply chain prior to retaining them. Additionally, for certain suppliers, Finning (Canada) engages a third party to complete due diligence screenings and this third-party has implemented enhanced measures to assess and identify possible modern slavery concerns with potential new suppliers.

EDUCATION

In 2023, most of our Canadian procurement group at Finning (Canada) and OEM completed a modern slavery in supply chains course which focused on identification of modern slavery risks with suppliers, the due diligence process when evaluating suppliers, and internal processes for reporting concerns. This course helped establish a baseline understanding of modern slavery issues and raised general awareness of the issue within our team.



G. ASSESSING EFFECTIVENESS

As this is our first Joint Modern Slavery Report, it is too early to assess and report on the effectiveness of the anti-modern slavery measures we implemented in 2023. In the future, it may be appropriate to identify measurable key performance indicators that we can monitor on a year-over-year basis, revising as required, to assess our effectiveness.



H. CONCLUSION

We are committed to the ongoing enhancement of our procurement processes and the identification and mitigation of modern slavery risks within our supply chain. We will continue monitoring modern slavery risks in our supply chain and identifying areas for improvement. To accomplish this, we will maintain active engagement with our suppliers particularly those in higher risk industries.

Moreover, Finning will continue to raise internal awareness of modern slavery issues through ongoing education and training. We plan to refine and expand our educational initiatives as new information and training tools become available. We believe that increasing awareness and encouraging an ongoing dialogue will empower our team to better identify modern slavery risks and engage meaningfully with our suppliers on this topic.

I. CONCORDANCE TABLE

For ease of reference, the concordance table below sets out which section(s) of this Report respond to the various requirements in the Act.

| REPORT REQUIREMENTS FROM THE ACT | SECTION OF THE REPORT |
|---|--|
| The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity. | Section E (under Supplier Code of Conduct) and Section F |
| The entity's structure, activities and supply chains | Section C |
| Its policies and due diligence processes in relation to forced labour and child labour | Sections D and E |
| The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk | Section E |
| Any measures taken to remediate any forced labour or child labour | Section E (under Other Suppliers) |
| Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains | Section E (under Other Suppliers) |
| The training provided to employees on forced labour and child labour | Section F |
| How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains | Section G |