



# MODERN SLAVERY REPORT

By Oakcreek Golf & Turf LP

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# 2023 Modern Slavery Report



## 1. Introduction

This Report is produced by Oakcreek Golf & Turf LP (“Oakcreek” or “the Company” or “our” or “we”) for the financial year ending December 31, 2023 (the “Reporting Period”) and sets out the steps taken 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 or of goods imported into Canada by the Company. This Report constitutes the first report prepared by the Company pursuant to Canada’s new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

## 2. Steps to prevent and reduce risks of forced labour and child labour

Oakcreek believes it is our responsibility to uphold the highest standards of ethical behaviour and personal integrity within our business operations. Wherever we do business, our colleagues are required to comply with all applicable laws, rules, and regulations.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person’s liberty and dignity for another person’s gain. Oakcreek has a zero-tolerance approach to modern slavery, and is fully committed to preventing slavery and human trafficking in our operations and supply chain. As a company we are committed to protecting our organization and those people at risk from exposure to slavery or human trafficking in our supply chain, both via our direct employees and those working on our behalf via third party suppliers.

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the highest importance on respecting human rights while conducting our business activities everywhere we operate. We expect the same of our business partners.

In general terms, we took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- Reviewed all of our material suppliers documentation and policies on modern slavery:
  - The Toro Company’s website states: *“The Toro Company and its subsidiaries (collectively “TTC”) strongly oppose modern slavery by any person or organization, including its business partners. Furthermore, as a manufacturer doing business globally, TTC is committed to compliance with all applicable laws prohibiting modern slavery.”* Further, TTC’s Human Rights Policy states *“that we stand against all forms of child labor and forced labor including indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. The Policy further states that we will not tolerate within our business or supply chain any act of recruiting, harboring, transporting, providing or obtaining a human being for compelled labor or other unlawful purposes and that we expect all of our business partners to comply with local labor and employment laws wherever they operate.”*
  - Yamaha Group’s website states: *“we stand against all forms of child labor and forced labor including indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. The Policy further states that we will not tolerate within our*



*business or supply chain any act of recruiting, harboring, transporting, providing or obtaining a human being for compelled labor or other unlawful purposes and that we expect all of our business partners to comply with local labor and employment laws wherever they operate.”*

- Kaessbohrer’s (PistenBully manufacturer) code of conduct states: *“The company undertakes to comply with the principles of the European Convention on Human Rights and the UN Charter and to observe and respect human rights as fundamental values. This applies in particular to the prohibition of child and forced labor, the prohibition of all forms of human trafficking and modern slavery, and the equal treatment of employees. As part of our employer commitment, we support equality and inclusion, and we do not tolerate any kind of (unlawful) discrimination, harassment or violence. Furthermore, we use our business relationships to prevent or mitigate human rights abuses in the course of our business activities to the extent within our control. We do not tolerate slave labor, forced labor or child labor among our business partners in the same way. All employees are required to report any suspicious circumstances.”*

### **3. Structure, activities and supply chains**

Oakcreek is a limited partnership based in Alberta, Canada. Founded in 1969, Oakcreek provides sales and service of Toro Commercial Turf Care Equipment, Toro Golf Irrigation Product and Yamaha Golf Cars to the golf course and municipal grounds care markets in Western Canada. We also supply and service PistenBully Snow Cats for ski grooming, cat ski operations and industrial applications.

Oakcreek is a Canadian business, with 76 employees as of December 31, 2023. It strives to create a diverse and inclusive culture everywhere it operates.

Oakcreek is committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains and expect the same high standards from all of our contractors, suppliers and other business partners. We establish a relationship of trust and integrity with all our suppliers, which is built on mutually beneficial factors.

### **4. Policies and due diligence processes**

#### Code of Conduct

Oakcreek’s Code of Conduct applies to all members of the Oakcreek community, including the Board of Directors, management and employees at every level. It addresses ethical conduct in our work environment, business practices and relationships with external stakeholders. The principles set out in the Code reflect Oakcreek’s belief that honesty and integrity foster a positive work environment that strengthens the confidence of all stakeholders. The Code details the standards of behaviour expected from everyone to whom it applies in their daily activities and in dealings with others.



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## Due Diligence

Oakcreek continues to take its responsibilities seriously and whilst building on the actions already in place, we will continue to look for more ways to fortify our method of identifying and mitigating the risk of Modern Slavery.

### Our Approach:

- Continue to assess the risk of slavery and trafficking into our supplier due diligence process for areas of the business we deem to be higher risk.
- Continue to issue review our suppliers published modern slavery policies and codes of conduct that highlights the standards they hold themselves and their suppliers to.
- Continue to seek opportunities for training for Management to enable them to identify, assess, mitigate and report specifically on Modern Slavery.

Whilst ultimately the majority of risks within the business rest with our manufacturers and suppliers, we are not complacent and will continue as a Company to seek to identify and manage any potential risks associated with Modern Slavery. We have endeavoured to put safeguards in place to ensure, so far as is reasonably practicable, that the working practices of those employed directly by us and those with whom we have a direct contractual arrangement with also have a similar zero tolerance to Modern Slavery.

### **5. Assessing and managing our forced labour and child labour risks**

Oakcreek uses a risk-based approach to assess and manage its risk of forced labour and child labour. Our approach helps us prioritize our efforts and adjust our actions. Our methodology to identify risks in our supply chain through our due diligence process combines notably country risk indicators, supplier's category and type of products/services offered by the supplier. The resulting risk score determines the level of additional due diligence to be performed, including with respect to forced and child labour, and the extent of ongoing monitoring and frequency of review required.

Our methodology to identify risks is notably based on 1) whether the supplier is headquartered or its manufacturing sites are located in countries that have a low score on the corruption perception index and/or that are at risk according to the global slavery index based on the products they supply to Oakcreek, 2) whether the products/services come from or are delivered to one of the countries mentioned above, and 3) whether Oakcreek is supplied with certain indirect goods and services.

### **6. Remediation measures**

Our Employment Manual includes a Code of Ethics and offers reporting, investigation and documentation mechanisms for our employees to report ethical or legal violations, among other concerns. If a situation of non-compliance is identified, Oakcreek will work to develop and implement a corrective plan to improve and remedy the situation.



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## 7. Training

In 2024, Oakcreek intends to provide training to targeted audiences that will include child and forced labour.

## 8. Assessing effectiveness

Oakcreek has in place a number of measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. While we have not yet taken any actions to assess the effectiveness of those actions, Oakcreek intends to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains at a later stage.

## 9. Approval and attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Oakcreek Golf & Turf LP.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this 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 Oakcreek Golf & Turf LP.

Per: \_\_\_\_(signed) Barrie Carpenter\_\_\_\_

Full Name: Barrie Carpenter

Title: President and Director of Oakcreek Golf & Turf LP

Date: May 16, 2024

