



## **Alamo Group Companies** **Joint Modern Slavery Report** **For The Year Ended December 31, 2024**

This is the Joint Modern Slavery Report (“Report”) of Alamo Group (USA) Inc., Alamo Group (Canada) Inc., Schulte Industries Ltd., Tenco Inc., and Alamo Group Ag Americas LLC (formerly known as Bush Hog LLC and on behalf of its predecessor in interest RhinoAg LLC) for financial year 2024 (the “Reporting Period”) in accordance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). Alamo Group (USA) Inc., Alamo Group (Canada) Inc., Schulte Industries Ltd., Tenco Inc., and Alamo Group Ag Americas LLC are collectively referred to herein as “ALG,” the “Company,” “we,” “us,” or “our”. This is a joint report for ALG as is authorized under Section 11(2) of the Act. Please refer to the Act for definitions to the terms used in this Report, unless otherwise defined herein. In accordance with the Act, this Report is available on the respective websites of ALG.

The Act requires the disclosure of the steps the Company has taken during the previous financial year to prevent and reduce the risk that forced labour and child labour (as defined in the Act) is used at any step of the production of goods it produces in Canada or elsewhere or that it imports into Canada. In addition, the Company must report on the following: (a) its structure, activities and supply chains; (b) its policies and its due diligence processes in relation to forced labour and child labour; (c) 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; (d) any measures taken to remediate any forced labour or child labour; (e) 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; (f) the training provided to employees on forced labour; and (g) how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

Respect for human rights is a fundamental value of ALG and Alamo Group (defined below). We are committed to respecting internationally recognized human rights principles throughout our operations globally. ALG does not tolerate the use of child labour and prohibits the use of forced or involuntary labour in any form. In addition, ALG is committed to maintaining the highest ethical standards and to conducting business in a manner consistent with our legal and moral obligations to our customers, suppliers, employees, shareholders and the public.

### **I. Identifying Information of ALG**

This Report is a joint report for Alamo Group (USA) Inc., Alamo Group (Canada) Inc., Schulte Industries Ltd., Tenco Inc., and Alamo Group Ag Americas LLC. Alamo Group (USA) Inc. is headquartered in Texas, United States of America, Alamo Group (Canada) Inc. is headquartered in Saskatchewan, Canada, Schulte Industries Ltd. is headquartered in Saskatchewan, Canada, Tenco Inc. is headquartered in Quebec, Canada, and Alamo Group Ag Americas LLC is headquartered in Alabama, United States of America. ALG is part of the larger Alamo Group Inc. organization (“Alamo Group”) and as such ALG is subject to Alamo Group policies and is a part of Alamo Group’s activities. Alamo Group is in the manufacturing industry and is a leader in the design, manufacture and servicing of truck and tractor mounted mowing and

other vegetation maintenance equipment, street sweepers, snow removal equipment, excavators, vacuum trucks, other industrial equipment, agricultural implements, forestry equipment and related after-market parts and services.

On December 31, 2024, RhinoAg LLC merged with Bush Hog LLC and simultaneously Bush Hog LLC changed its name to Alamo Group Ag Americas LLC. As RhinoAg LLC and Bush Hog LLC were both subject to the Act for financial year 2024, Alamo Group Ag Americas LLC, as successor in interest, joins to this Report on RhinoAg LLC’s behalf. Alamo Group Ag Americas LLC is also subject to California’s Transparency in Supply Chains Act.

**II. Steps Alamo Group and ALG Have Taken in 2024 to Prevent and Reduce the Risk the Forced Labour or Child Labour**

During the course of the Reporting Period, Alamo Group, which includes ALG, has continued to utilize the various measures detailed in its 2023 Joint Modern Slavery Report, which includes: (i) the use of a screening tool to track products shipped to customers and verify that such customers are not subject to any restrictions promulgated by the United States Customs and Border Protection agency; (ii) the oversight by Alamo Group employees, at an office in China, for Alamo Group’s procurement of products in China; and (iii) the continued review of the potential presence of conflict minerals in Alamo Group’s products.

**III. Alamo Group’s Structure, Activities, and Supply Chain**

**A. Structure**

Alamo Group is structured as centralized holding companies that manage the business strategy and high-level administrative, legal, and financial operations of wholly-owned subsidiaries conducting the day-to-day manufacturing activities of the organization. ALG is part of the larger Alamo Group organization which includes additional legal entities not subject to the Act. During the course of financial year 2024, Alamo Group employed an average of 491 individuals in Canada and an average of 3,747 individuals outside of Canada. Alamo Group’s policy and standard practice is to hire individuals over the age of 18 (except for in limited circumstances where the employee is part of a work study or vocational program) and in accordance with the labor and employment laws of the jurisdiction in which the operational subsidiary is located. Alamo Group directly employs its employees and only contracts with third party contractors on a limited basis. The entity structure and location of operations for each of the ALG companies are set forth in the following table:

Name	Entity Structure	Location of Operations
Alamo Group (Canada) Inc.	Corporation	Saskatchewan, Canada
Alamo Group (USA) Inc.	Corporation	Texas, USA
Schulte Industries Ltd.	Corporation	Saskatchewan, Canada
Tenco Inc.	Corporation	Quebec, Canada
Alamo Group Ag Americas LLC	Limited Liability Company	Alabama, USA

An additional operational subsidiary of Alamo Group which is not subject to the Act but which is also located in Canada is Everest Equipment Co., a corporation with operations located in Quebec, Canada.

## **B. Activities**

Alamo Group, through operational subsidiaries, manufactures and services high-quality vegetation management and infrastructure maintenance equipment for governmental, industrial and agricultural use. These activities include the purchase of raw materials and finished goods from Original Equipment Manufacturers (OEMs), machining parts and components as necessary, and producing finished goods for sale to its customers. Alamo Group (USA) Inc., through its operational subsidiaries, including but not limited to Alamo Group Ag Americas LLC, sells and distributes vegetation management equipment both in Canada and outside Canada. Alamo Group (Canada) Inc., through its operational subsidiaries (Schulte Industries Ltd., Tenco Inc., and Everest Equipment Co.), produces, sells, and distributes both industrial equipment and vegetation management equipment in Canada and outside Canada. The Canadian factories are located in Saskatchewan and Quebec.

## **C. Alamo Group Organization Supply Chain**

Alamo Group manufactures many of the parts for its products, however, a significant percentage of parts, including most drivelines, gearboxes, industrial engines, and hydraulic components, are purchased from outside suppliers which manufacture to the operational subsidiary's specifications. Alamo Group sources its purchased goods from international and domestic suppliers. No one supplier is responsible for supplying more than 10% of the principal raw materials or purchased goods used by Alamo Group. The top categories of goods Alamo Group purchases through its supply chain are as follows: (i) hydraulics; (ii) drivetrains and power transmissions; (iii) steel/metal and fabrications; (iv) chassis; and (v) engines. The total number of suppliers for financial year 2024 for Alamo Group was approximately 5,529 suppliers.

## **IV. Alamo Group's Policies and Due Diligence Processes**

Alamo Group has the following policies and procedures in place relevant to combating the use of forced labour or child labour in its operations and supply chain: (i) Labor and Human Rights Policy; (ii) Minimum Age for Employment Policy, (iii) Code of Business Conduct and Ethics Policy; (iv) Supplier Code of Conduct; and (v) Conflict Minerals Policy.

Alamo Group's Labor and Human Rights Policy informs Alamo Group employees of Alamo Group's commitment to supporting and protecting basic human rights principles in the conduct of its global business. In addition, the Labor and Human Rights Policy specifically addresses Alamo Group's zero tolerance and prohibition of child labour, forced and involuntary labour whether in the form of indentured labour, bonded labour or otherwise, and any form of human trafficking. The Labor and Human Rights Policy also directs employees to report any situation in which there is a good faith belief that the policy has been violated, provides the process for reporting such violations, and informs employees that they will be protected from any form of retaliation for reporting any specific violations.

Alamo Group's Minimum Age for Employment policy prohibits its US operational subsidiaries from the employment of individuals under the age of 18 as regular employees but allows individuals under the age of 18 to be employed on a temporary basis and in accordance with the local and federal labor laws of the jurisdiction the operational subsidiary is located in. Similarly, Schulte Industries Ltd.'s ("Schulte") and Tenco Inc.'s ("Tenco") hiring practices are in accordance with local and federal labor laws and they restrict the employment of individuals under the age of 18 as regular employees but allows individuals under the age of 18 to be employed on a temporary basis. Under both the Minimum Age for Employment policy and Schulte's and Tenco's hiring practices, such temporary employees under the age of 18 are prohibited from engaging in hazardous activities.

Alamo Group's Code of Business Conduct and Ethics Policy ("Code of Conduct") sets forth specific policies governing Alamo Group's worldwide conduct in its facilities and where it transacts business. All employees are directed to comply with the letter and the spirit of the law which includes the laws in various jurisdictions prohibiting child labour and forced labour. The Code of Conduct sets forth the reporting methodology any employee may use to notify the governing bodies and management of ALG and Alamo Group when there has been any violation of the Code of Conduct. Alamo Group employees receive mandatory training on the Code of Conduct.

Alamo Group's Supplier Code of Conduct informs suppliers of Alamo Group's expectations that suppliers will comply with all applicable laws and regulations, including labour and employment laws. The Supplier Code of Conduct specifically addresses Alamo Group's prohibition on the use of child labour and forced labour/human trafficking. In addition, the Supplier Code of Conduct provides notice to suppliers that Alamo Group may monitor suppliers to assess compliance with the Supplier Code of Conduct, including, but not limited to, on-site inspections and review of books and records. The Supplier Code of Conduct provides that Alamo Group reserves the right to terminate its business relationship with any supplier who fails to comply with the Supplier Code of Conduct.

Alamo Group's Conflict Minerals Policy informs suppliers of Alamo Group's commitment to minimize the procurement of materials, products or components which contain Conflict Minerals (as defined in the Policy). In addition, the Conflict Minerals Policy sets forth the expectation that to the extent Conflict Minerals are necessary to the functionality or production of products that Alamo Group manufactures or contracts to manufacture, Alamo Group will conduct reasonable country of origin inquiry and supply chain diligence to determine if the Conflict Minerals originated in mines controlled by armed groups in the Covered Countries (as defined in the Policy). The Conflict Minerals Policy also informs suppliers of Alamo Group's expectations for suppliers' own due diligence inquiries into their potential use of Conflict Minerals.

ALG's primary due diligence processes have been the implementation of responsible business conduct into the policies described above. Through the reporting methodology included in its corporate policies, ALG is able to identify, prevent and mitigate risks related to child labour or forced labour that may be reported to ALG's governing bodies or management.

## **V. Parts of ALG’s Business and Supply Chain that Carry a Risk of Forced Labour or Child Labour and Steps Taken to Assess and Manage that Risk**

ALG have had no reports of, nor seen any evidence of, forced labour or child labour in its internal organization or supply chain. As stated above, due to Alamo Group’s practices of employing individuals over the age of 18, except for in limited circumstances, and directly employing its employees, there is minimal risk of forced labour or child labour in its internal operations. Based on ALG’s experience in its industry, the areas of ALG’s business and supply chain that carry a risk of forced labour or child labour are the procurement and sourcing of products in China and the potential presence of conflict minerals in the product offerings of ALG.

Alamo Group is continuing to evaluate its supply chain and procurement practices in China. The initial steps taken to assess and manage the risk of forced labour or child labour in Alamo Group’s procurement and sourcing practices in China are that Alamo Group contracts with established Chinese manufacturers and suppliers who have a reputation for sound business practices. In addition, Alamo Group has established a physical location in China to coordinate its procurement and sourcing activities. At such location, Alamo Group employs individuals who investigate suppliers and make site visits to manufacturing facilities to verify no forced labour or child labour is taking place in such Chinese manufacturing facilities.

The steps taken to assess and manage the risk of forced labour and child labour due to conflict minerals in Alamo Group’s product offerings are that Alamo Group has established a Conflict Minerals Policy that results in ongoing efforts to identify and assess the risk of the presence of any conflict minerals in the products supplied to a member of Alamo Group, to conduct due diligence measures with suppliers to identify if conflict minerals are present in the products or materials supplied to a member of Alamo Group, and to report on the results of such activities. More detailed information on Alamo Group’s steps to minimize the use of conflict minerals can be found in the Alamo Group’s Conflict Minerals Report and Conflict Minerals Policy located at [www.alamo-group.com](http://www.alamo-group.com) under “Corporate Governance.”

## **VI. Measures Taken to Remediate Any Forced Labour or Child Labour or the Loss of Income to the Most Vulnerable Families**

As stated above, ALG has not encountered any incidents of forced labour or child labour being used in its operations or supply chain. Given there were no reports or incidents, ALG has not had to take any measures to remediate any forced labour or child labour, or to remediate any loss of income to vulnerable families as a result of remediation efforts.

## **VII. Training Provided to Employees on Forced Labour and Child Labour**

As stated above, ALG employees are trained on its Code of Conduct. Such training includes information on ALG’s expectation that all employees comply with all company policies and procedures and all laws, including, but not limited to, laws against forced labour and child labour. This training is organizational wide and mandatory for all ALG employees. The training

was developed by an independent external company that is a global leader in applied safety science and the duration of the training is approximately thirty minutes long.

### **VIII. How ALG Assesses Its Effectiveness in Ensuring Forced Labour and Child Labour Are Not Being Used in Its Business and Supply Chains**

ALG is continuing to determine which actions would assist in assessing its effectiveness in ensuring forced labour and child labour are not being used in its business activities and supply chains. While it has begun to take certain actions as described above, it has not yet taken steps to assess the effectiveness of those actions.

This Report was approved pursuant to subsection 11(4)(b)(i) by the board of directors or managers (as the case may be) of each of Alamo Group (USA) Inc., Alamo Group (Canada) Inc., Schulte Industries Ltd., Tenco Inc., and Alamo Group Ag Americas LLC.

Dated: May 27, 2025

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