



RS TECHNOLOGIES INC.

2025 REPORT UNDER THE CANADIAN SUPPLY CHAINS ACT

I. ABOUT THIS REPORT

RS Technologies Inc. ("**RST**") has prepared this report (the "**Report**") on behalf of itself and its wholly-owned and controlled U.S. subsidiary RS Utility Structures Inc. ("**RSUS**"). The Report was prepared pursuant to the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the financial year ended December 31, 2025.

This is a joint Report made on behalf of RST and RSUS (collectively the "**RST Reporting Entities**"). All references in this Report to the "**Company**", "**we**", or "**our**" refer to the RST Reporting Entities unless otherwise indicated. This Report has not been externally assured, and the Reporting Entities do not prepare reports under comparable forced labour or child labour legislation in any other jurisdiction.

The Reporting Entities support efforts to prevent and reduce the risk of all forms of exploitation and conduct that violate human rights through any form of forced labour or child labour (collectively, "**Modern Slavery**") in their operations and supply chains and are committed to conducting business in a manner that respects internationally recognized human rights

II. STRUCTURE, ACTIVITIES & SUPPLY CHAINS

A. Structure

RST is a privately held Alberta corporation, incorporated under the Alberta *Business Corporations Act*. Founded in 1995 as "Recycled Solutions for Industry", RST initially focused on the development and commercialization of proprietary resin systems for a range of end-use applications. Beginning in 2003, RST expanded its operations to include the development and manufacture of composite utility poles and related structures.

The Reporting Entities operate manufacturing facilities in Tilbury, Ontario, Canada; St. George, Utah, United States; and Humble, Texas, United States.

As of December 31, 2025, the Reporting Entities employed approximately 359 individuals across Canada and the United States.

B. Activities

We design, engineer, and manufacture composite utility poles and related products for the electric transmission and distribution sectors. By applying superior resin formulations, world class engineering, stringent quality processes and dedicated technical services, we are the global leader in composite utility structure design and manufacturing. The Company's poles' unique design and characteristics enhance the reliability and resiliency of the world's electric distribution and transmission systems.

C. Supply Chains

The RST Reporting Entities utilize a supply network from several countries, including Canada, Germany, Poland, Bahrain, Brazil, China and the United States, to support our operations.

As a manufacturer of composite utility structures, the Reporting Entities' supply chain is primarily focused on the procurement of raw materials used in the production process. The most significant categories of raw materials include glass fiber and resin chemical components.

The RST Reporting Entities source glass fiber sourced from a limited number of large suppliers with manufacturing and distribution facilities in multiple jurisdictions. In 2025, the Reporting Entities sourced glass fiber from suppliers with operations in the United States, Canada, Brazil and Bahrain.

The primary chemical components used in the Company's proprietary polyurethane resin formulations are sourced from large international suppliers with operations in the United States, Germany, China and Poland.

In preparing this Report, the RST Reporting Entities considered publicly available risk indicators, including the [Global Slavery Index](#) 2023 and the [2024 List of Goods Produced by Child Labor or Forced Labor](#) published by the U.S. Department of Labor. Based on this review and the nature of the Reporting Entities' supplier relationships, the Reporting Entities currently assess the suppliers of glass fiber and primary chemical components as presenting a relatively lower risk of forced labour and child labour compared to higher-risk sectors.

Additional categories of procurement include capital equipment, tooling, manufacturing consumables and pole-related hardware, including assembly tools, top caps, base plates, climbing steps, brackets, cross-members and other fabricated metal components.

The Reporting Entities' machinery, tooling and tool-and-die suppliers are principally located in Canada and the United States.

Certain standardized components are sourced from specialized manufacturers that produce parts in accordance with the Reporting Entities' specifications and, where applicable, customer specifications. These components may be manufactured using casting, forging and injection-molding processes.

Where qualified suppliers are available in proximity to the Reporting Entities' manufacturing facilities, preference is generally given to local or regional suppliers. This approach is particularly relevant for manufacturing consumables and other frequently purchased materials, where reliable delivery and proximity support operational efficiency and supply continuity.

In addition to the above, other categories of major expenditures include capital equipment, tooling vendors, suppliers of consumables, third-party providers of pole-related hardware such as assembly tools, top caps, base plates, climbing steps, brackets, crossmembers and a variety of metalworks.

III. POLICIES AND DUE DILIGENCE

The policies and due diligence processes set out in this section are implemented by RST and adopted by RSUS.

The Reporting Entities maintain a number of policies, procedures, contractual controls and due diligence processes designed to identify, assess and mitigate the risk of forced labour and child labour in their operations and supply chains. These include:

- Supplier Management System Survey and Vendor Qualification and Audit;
- Code of Business Conduct;
- Integrity Helpline and Whistleblower Policy;
- Annual Employee Compliance Certification;
- Senior Management and Commercial Team Compliance Certifications; and
- Terms and Conditions of Company Purchase Orders.

A. Supplier Management System Survey and Vendor Qualification and Audit

The Reporting Entities use a Supplier Management System Survey as part of their supplier due diligence process to assess potential risks of forced labour and child labour across their supply chains.

In the survey, our suppliers are required to answer the following questions:

- *Has your company established a policy expressly prohibiting slavery, forced labor, child labor, human trafficking or any other activities that violate basic human rights and dignity?*
- *Does your company provide training to the employees on anti-slavery?*
- *Does your company conduct regular audits or assessments of suppliers to evaluate compliance with anti-slavery and human trafficking standards?*
- *What measures has your company implemented to prevent and mitigate forced labor, child labor and human trafficking occurring during any stage of goods production, providing service or any other activities?*
- *Do you declare that you shall comply with applicable wage and hour, anti-slavery and human trafficking laws and shall not engage in human trafficking or use child or forced labor in connection with the supply of products and/or services?*
- *Do you declare that you shall notify the applicable RS entity as soon as you become aware of any actual or suspected slavery, child or forced labor, or human trafficking in its supply chain and other activities?*

When qualifying new vendors, particularly those providing larger scale machines, tooling or specialized equipment, representatives of the RST Reporting Entities often physically visit the vendors' premises. These visits typically occur initially as well as along the course of the project, allowing for monitoring and ongoing assessment of a given vendor's performance. This practise is supported by the RST Reporting Entities' right of access that is set out in the terms and conditions of executed contracts and issued purchase orders, which provides the right to visit the premises of certain vendors and any sub-tier vendors or suppliers, as applicable, for business meeting or audit purposes.

B. Code of Conduct

The RST Reporting Entities' Code of Conduct (the "**Code**") establishes standards of conduct applicable to directors, officers, employees and contractors in all jurisdictions in which the Reporting Entities operate. Each director, officer, employee, and contractor of the RST Reporting Entities are provided with a copy of the Code at commencement of appointment or employment. For employees, the review, acknowledgement and commitment to abide by the Code occurs not only as part of the Company's onboarding process, but also annually as set out in part C of this section, below.

The Code contains the following provision addressing Modern Slavery:

HUMAN RIGHTS AND FORCED LABOR

Respect for human rights is a fundamental value at RST. We strive to respect and promote human rights in our relationships with our employees, contractors, suppliers, and customers. We use due diligence to identify and prevent human rights risks to people in our business and value chain. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. Forced labour continues to be a critical human rights issue globally. RST prohibits the use of all forms of modern slavery or forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour, child labour and any form of human trafficking. RST focuses on promoting inclusive and sustainable economic growth and decent work for all.

C. Annual Employee Compliance Certification

All employees of the Reporting Entities are expected to complete an annual certification confirming their compliance with the Code, including its provisions relating to human rights, forced labour and child labour. The certification process also includes inquiries regarding potential violations of the Code and concerns relating to business relationships with third parties, including suppliers and vendors.

D. Integrity Helpline and Whistleblower Policy

The Reporting Entities maintain an Integrity Helpline (the "**Helpline**") and a Whistleblower Policy. Employees are informed of the availability of these reporting mechanisms and are encouraged to raise concerns regarding actual or suspected misconduct.

The Helpline and Whistleblower Policy permit reports to be made confidentially and, where permitted by law, anonymously. Concerns relating to forced labour, child labour, human trafficking or other human-rights issues may be reported without fear of reprisal or retaliation.

E. Senior Management and Commercial Team Compliance Certifications

Members of the Reporting Entities' senior management and commercial teams are required to complete periodic certifications regarding compliance with applicable laws, internal policies and disclosure obligations. These certifications include confirmation, to the best of the individual's knowledge and belief following reasonable inquiry, of compliance with applicable employment and labour-related legislation.

F. Terms and Conditions of Company Purchase Orders

The Reporting Entities' standard purchase order terms and conditions include contractual representations and obligations relating to forced labour, child labour and human trafficking, including the following provision:

Anti-Slavery: Vendor warrants that it shall comply, and ensure that its sub-contractors comply, with all applicable wage and hour, anti-slavery and human trafficking laws and shall not engage in human trafficking or use child or forced labor in connection with its supply of Products and/or Services or its performance of this Purchase Order. Vendor shall notify [the applicable RST Reporting Entity] as soon as it becomes aware of any actual or suspected slavery, child or

forced labor, or human trafficking in its supply chain which has a connection with this Purchase Order.

IV. POTENTIAL RISKS IN RST'S OPERATIONS AND SUPPLY CHAINS

Potential Risks in Company Operations

Based on the nature of their operations and workforce, the Reporting Entities currently assess the risk of forced labour and child labour in their own operations as relatively low.

Factors supporting this assessment include:

- The Reporting Entities' operations are located primarily in Canada and the United States, jurisdictions that have comparatively low prevalence rates of forced labour and child labour and established legal and regulatory frameworks addressing labour standards and human rights;
- The majority of the Reporting Entities' workforce is employed at manufacturing facilities where work is performed on site and employees receive role-specific training and supervision;
- The industrial and business-to-business nature of the Reporting Entities' products and services, which requires a skilled and technically competent workforce; and
- The highly regulated environment in which the Reporting Entities and their customers operate, particularly within the electrical transmission and distribution sector.

Based on the foregoing, and taking into account the policies, procedures and controls described in this Report, the Reporting Entities currently assess the residual risk of forced labour and child labour within their own operations as relatively low. The Reporting Entities will, however, continue to evaluate opportunities, where appropriate, to enhance the policies, processes, and due diligence measures.

Potential Risks in Our Supply Chains

The Reporting Entities currently assess the risk of forced labour and child labour in their supply chains as relatively low.

Factors supporting this assessment include:

- The Company's reliance on large, established suppliers of key raw materials, particularly glass fiber and chemical components;
- The specialized and technical nature of the capital equipment, tooling and manufacturing services procured by the Reporting Entities, which typically involve ongoing engagement and collaboration with supplier personnel;
- The fact that a substantial portion of the Reporting Entities' major suppliers are located in North America and Europe, including suppliers whose facilities may be visited by representatives of the Reporting Entities as part of vendor qualification, project management or business review processes; and
- Contractual requirements contained in purchase orders and supply agreements requiring suppliers to comply with applicable anti-slavery, forced labour, child labour and human trafficking requirements.

While the Reporting Entities recognize that forced labour and child labour risks may exist in any global supply chain, they currently assess the residual risk within their supply chains as relatively

low based on the information available to them and the due diligence measures described in this Report.

The Reporting Entities will continue to assess supply chain risks and consider enhancements to their due diligence framework as appropriate.

As of the date of this Report, the RST Reporting Entities have not identified any instances or allegations of Modern Slavery within their own operations or supply chains. Accordingly, no steps were required to remediate Modern Slavery, or the loss of income associated with remediation efforts.

V. TRAINING

The RST Reporting Entities have implemented an ongoing web-based training program that requires employees' completion of training modules about a range of topics relevant to their roles and responsibilities.

Additionally, as discussed above, our employees are expected to complete an annual certification of compliance with the Company's Code of Business Conduct. As part of this process, employees review and acknowledge the Code, including its provisions relating to human rights, forced labour and child labour, and certify their commitment to comply with its requirements.

The Company continues to evaluate opportunities to enhance employee awareness and training relating to the identification and prevention of the risks of Modern Slavery.

VI. ASSESSING EFFECTIVENESS

As we continue to evaluate the compliance measures in place that are designed to prevent and reduce the risk of Modern Slavery, we intend to consider, where appropriate, implementing measures to assess the effectiveness of those measures.

VII. APPROVAL & ATTESTATION

This Report was approved by the Board of Directors of RS Technologies Inc. on September 23, 2026, on behalf of itself and RS Utility Structures Inc., pursuant to section 11(4)(b)(ii) of the Act.

Signed by:

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John Higgins

Chief Executive Officer and Director

September 23, 2026

I have authority to bind RS Technologies Inc. and RS Utility Structures Inc.