

# **BLACK DIAMOND GROUP LIMITED ANNUAL JOINT REPORT 2024**

**FIGHTING AGAINST FORCED LABOUR AND  
CHILD LABOUR IN SUPPLY CHAINS ACT**

Issue Date: May 30, 2025

# ABOUT THIS REPORT

Black Diamond Group Limited's Annual Joint Report (2024) (the "Report") has been prepared in accordance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act")<sup>1</sup>.

Black Diamond Group Limited (Black Diamond) is a party to this joint report including two additional entities:

- Black Diamond Lodging Inc. (Black Diamond Lodging & Accommodations)
- BOXX Modular LP (BOXX Modular)

## INTRODUCTION

Black Diamond is committed to respecting human rights and acting with integrity in all operations and business dealings. One area of particular focus is modern slavery, which is an umbrella term for a number of serious exploitative work practices that represent violations of human rights.

This Report covers the reporting entities listed above for the Financial Year January 1, 2024 to December 31, 2024. It provides an overview of the steps Black Diamond is taking to prevent our involvement in human rights harm by positively influencing our supply chains and other business partnerships to act responsibly and ethically.

## ABOUT US

### BLACK DIAMOND

Black Diamond owns and operates a portfolio of businesses specializing in modular buildings and remote and temporary workforce accommodations, along with a digital marketplace for business-to-business crew travel management. With approximately 575 employees, and approximate assets of \$750 million worldwide, Black Diamond offers a comprehensive suite of solutions and services, including:

- Modular space solutions through BOXX Modular, which owns a large rental fleet of modular buildings of various types and sizes. Its network of local branches rent, sell, service, and provide ancillary products and services to a diverse customer base in the construction, industrial, education, financial, and government sectors.
- Workforce accommodations and solutions through Black Diamond Lodging, which owns a large rental fleet of modular accommodation assets of various types. Its regional operating terminals rent, sell, service, and provide ancillary products and services including turnkey operated camps to a wide array of customers in the resource, infrastructure, construction, disaster recovery, and education sectors.

<sup>1</sup> Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c.9).

## MISSION, VISION & VALUES

At Black Diamond Group, we're committed to our mission of Creating A Better Way. This mindset guides everything we do, from delivering effective modular space solutions to providing comprehensive remote accommodation solutions and innovative crew travel management.

Our vision is to build a world-class Company that is a leading provider of modular space solutions, workforce accommodations, and business-to-business crew travel management.

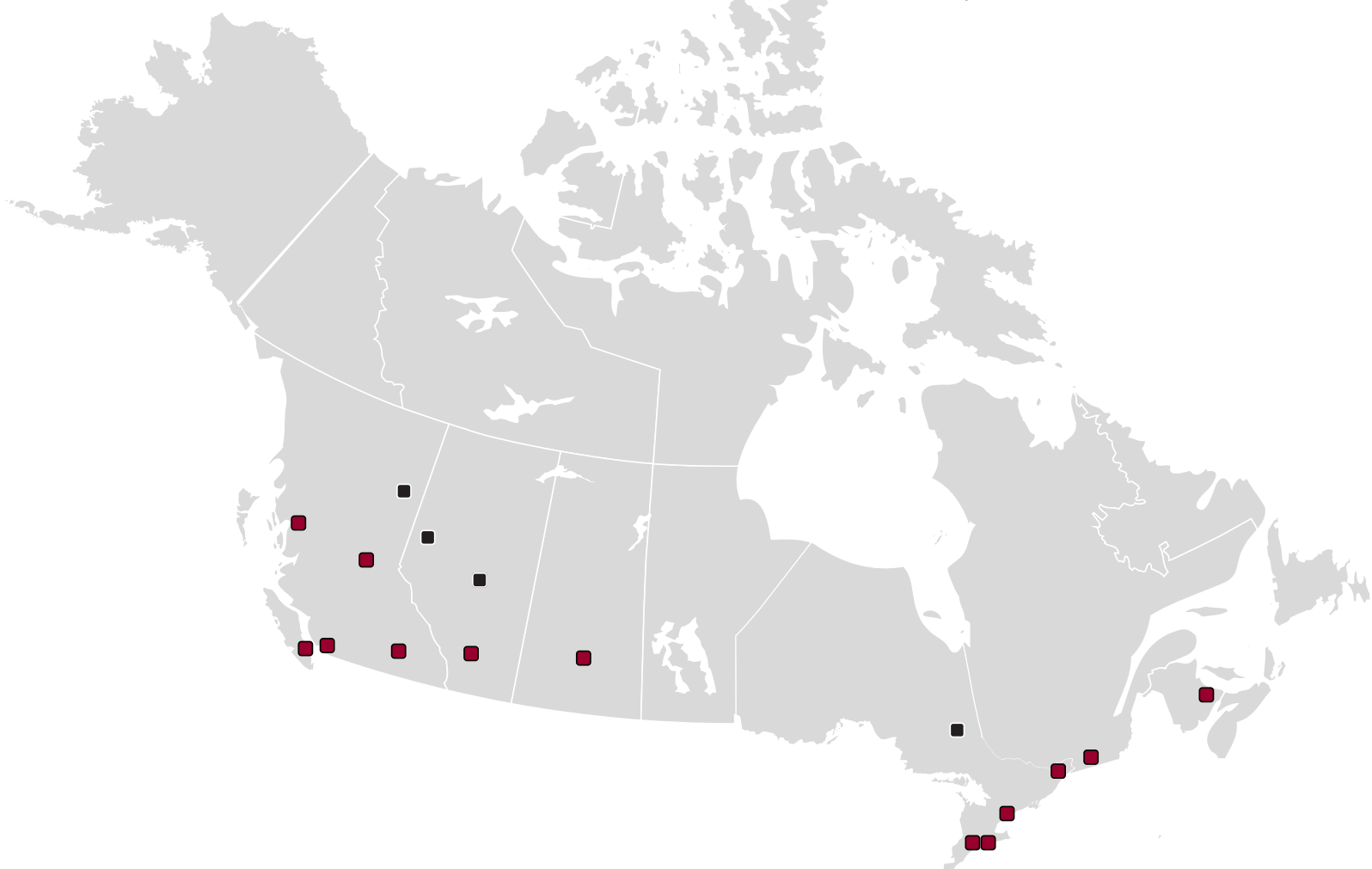
We believe in the power of our high-performing team and our values-based culture driven by three non-negotiables, which are at the heart of everything we do – integrity, trust and safety. Our values – dependability, respect, collaboration, innovation, creativity and determination – are more than just words; they are the foundation upon which we build our success.

We strive for an environment where the best people want to come to work and feel fairly rewarded for their work. We offer careers, not jobs, in an environment known for strength and brilliance – just like that of a Black Diamond.

## MAP OF OPERATIONS

Black Diamond has locations across Canada, operating in:

Terrace, BC • Nanaimo, BC • Langley, BC • Prince George, BC • Kelowna, BC • Fort St. John, BC • Grande Prairie, AB • Calgary, AB • Edmonton, AB • Regina, SK • Timmins, ON • Waterloo, ON • Toronto, ON • Ottawa, ON • Montreal, QC • Moncton, NB



# BLACK DIAMOND ENTITIES & ACTIVITIES

This Report covers the following entities:

- **Black Diamond Group Limited**

Black Diamond Group owns and operates a portfolio of businesses specializing in modular buildings and remote and temporary workforce accommodations.

- **BOXX Modular LP**

BOXX Modular provides high quality, cost effective modular space solutions to a diversified client base which includes general contractors, education providers, construction trades, manufacturers, commercial businesses, financial institutions, government agencies and various companies involved in the resource industry.

- **Black Diamond Lodging Inc.**

Black Diamond Lodging & Accommodations provides workforce accommodations and associated services throughout Canada to a client base which includes oil and natural gas exploration and development companies, mineral and metals mining and processing companies, catering and food services providers, engineering and construction companies, general contractors, pipeline constructors, disaster recovery, social housing initiatives and varying levels of governments. Black Diamond Lodging also provides turnkey lodging services, remote facility management and sophisticated supply chain management services to customers to improve efficiency of remote accommodation facilities.

## OUR SUPPLY CHAINS

Black Diamond delivers its services and solutions using a combination of our internal workforce, external suppliers, and contractors to ensure that activities, projects, and work program resources are deployed efficiently and at the lowest sustainable cost, maintained over the long-term. Black Diamond's success is linked to the performance of our supply chain.

# POLICIES AND DUE DILIGENCE

Black Diamond recognizes that modern slavery persists in regions where poverty rates are high, the rule of law is underdeveloped, and enforcement is absent or undermined by corruption.

Black Diamond's commitment to this is currently outlined in our "2023 Black Diamond Supplier Code of Conduct"<sup>2</sup> (Code of Conduct), setting out the standards of conduct we expect of ourselves and our suppliers:

## **X. Child Labour**

*Suppliers shall not exploit child labour and shall not employ any workers under the minimum legal age as dictated by law where the work is performed. In no instance shall a supplier permit a child to perform work that exposes them to undue physical risks that can harm their physical, mental, or emotional development or improperly interfere with their education or vocational needs.*

## **XI. Forced Labour**

*Suppliers must refrain from violating the rights of others, adhere to regulations prohibiting slavery, human trafficking and forced labour and comply with all applicable local laws in the country in which they operate. Employment decisions must be based on free choice and not under threats of violence or coercion. Work agreements must clearly state employment terms and must not restrict worker movement through the confiscation of identification documents.*

In addition, Black Diamond has other key procedures and practices which govern business activities, including:

- Code of Business Conduct and Ethics
- Whistleblower Policy

Each of these policies are published on our website. Awareness of these policies is supported by on-line training modules and annual acknowledgement for all Black Diamond employees.

<sup>2</sup> 2023 Black Diamond Supplier Code of Conduct

## DUE DILIGENCE

Black Diamond believes in working with business partners who demonstrate high standards of ethical business conduct. We expect them to be guided by the principles outlined in our policies and codes of conduct, and we will not knowingly work with business partners who operate unethically, unsafely or who violate the law, compete dishonestly, or use unfair business practices.

When engaging with our business partners, we take steps to retain them on commercially reasonable terms and conditions and are aware of, and contractually bound by, our standards of business conduct.

### **Risk of Forced Labour or Child Labour and Steps to Assess and Manage the Risk**

Black Diamond has started the process of identifying risks of forced labour or child labour in our activities or supply chains. We have identified a potential risk of a tier three supplier in the manufacturing sector, but there are still gaps in our assessment.

### **Measures taken to Remediate any Forced Labour or Child Labour or the Loss of Income to Vulnerable Families**

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

In accordance with the requirements of the Act 1, 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.



**Trevor Haynes**

*Chairman & CEO, Black Diamond Group Limited*

**Date: 05/30/2025**

*I have the authority to bind Black Diamond Group Limited, Black Diamond Lodging Inc., and BOXX Modular LP.*