



# HYDRA DYNE TECH

A member of the Interpump Group

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Hydra Dyne Technology, Inc.  
55 Samnah Crescent  
Ingersoll, ON, Canada N5C 3J7

## Hydra Dyne Tech – 2024 S-211 Annual Report Fighting Against Forced Labour and Child Labour in Supply Chains Act

**Reporting Period:** January 1, 2024 – December 31, 2024

**Date of Report:** May 31, 2025

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### 1. Reporting Entity

Hydra Dyne Technology Inc.  
55 Samnah Crescent, Ingersoll, Ontario, N5C 3J7, Canada

Parent Company: Interpump Group S.p.A., Italy

This report is submitted in compliance with Canada's Bill S-211 to outline the steps taken to prevent and reduce the risk of forced labour or child labour in our operations and supply chains.

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### 2. Structure, Activities, and Supply Chain

Hydra Dyne Technology Inc. is a Canadian manufacturing company based in Ingersoll, Ontario. Founded in 1992 as a hydraulic repair business, it evolved into a specialist in custom hydraulic components for heavy-duty off-road equipment. Its key products include Rotary joints, Hydraulic cylinders, Accumulators, Block manifolds, and Electrical slip rings.

In 2019, Hydra Dyne was acquired by the Interpump Group, an Italian multinational, which expanded its reach into global markets. The company is certified under ISO 9001:2015 and ISO 45001:2018, and is actively involved in community and educational initiatives.

Hydra Dyne sources raw materials (e.g., aluminum, steel, seals, and fittings), electronic components (e.g., sensors, wiring), and subcontracts manufacturing services.

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### 3. Policies and Due Diligence

Hydra Dyne Tech follows Interpump Group's global ethical standards, including:

#### Guideline on Human Rights Policy

- **5.2. Forced Labour** – Condemning all forms of exploitation of labour

- **5.3. Child Labour** – Condemning exploitation of child labour and prohibiting employment of children under the age of 16
- **5.7. Respect for human rights within the supply chain** - Requires suppliers to comply with labour laws and international standards prohibiting forced and child labour
- **6. Whistleblower Protection** - Confidential reporting mechanisms are available for employees and partners for issues within the company

**Hydra Dyne’s internal hiring policy** includes a section regarding labour laws

- **3.4. Labour Laws** – Condemning all forms of exploitation of labour, does not allow child labour

#### **Due Diligence**

- Developed in person supplier audit plan in 2024, supplier audits to take place in 2025
- Supplier Qualification Form, signing off on: Code of Ethics Policy, Human Rights Policy, and Environment, Health and Safety Guidelines
- Developed an Approved Supplier List: suppliers that have an impact on production parts. This includes raw material including forgings, castings, steel, etc. as well as tooling, outside service vendors, gauges, etc.
- Changes implemented in 2025 include:
  - Implemented ‘Supplier Periodic Policy Acknowledgement Form’ - We require our Approved suppliers to sign off on the policies every 5 years
  - Added a question to the supplier policy acknowledgement – Does the supplier have their own internal policies regarding child and forced labour? This question will be applied for 2026 audits

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#### **4. Risk Assessment and Management**

Hydra Dyne Tech assesses the following risk areas:

- **Geographic Risk:** Suppliers in countries with known labour rights concerns
- **Sector Risk:** Metal sourcing and electronic components carry higher exposure
- **Subcontracting Risk:** Third-party manufacturing in low-cost regions is monitored

Research into the above areas was performed using data from the following sources:

- Global Slavery Index
- US Department of Labour – 2024 list of goods produced by Child or Forced Labour
- Performing in person supplier audits

Using these risk areas and indices, Hydra Dyne has assessed Tier 1 suppliers using the country of origin of the raw materials and components purchased. Hydra Dyne has not identified any purchased parts

with Geographic risk or Sector Risk. Hydra Dyne does not have any third party manufacturing outsourced to low-cost regions.

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## 5. Remediation Measures

In 2024, no confirmed instances of forced or child labour were identified, therefore no remediation measures have been taken.

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## 6. Training

- **2024 Training:** Management and procurement teams have read and acknowledged Interpump Group's Code of Ethics Policy, Human Rights Policy, and Environment, Health and Safety Guidelines
    - Completion rate for compliance training in 2024: All employees mandated to read and sign off on the policies
    - All employees must review and sign off on the policy upon hire
  - **2025 Training Plan:** Hydra Dyne will implement additional training for our supplier facing departments and staff on the requirements of Bill S-211, as well as the definitions, signs and risk factors for forced/child labour
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## 7. Effectiveness and Metrics

**In 2024, effectiveness was tracked by:**

- % of employees signed off on Interpump Group's 3 Policies: 93%
- % of suppliers signed off on Interpump Group's 3 Policies: 32%
- Incidents reported: 0
- Whistleblower reports related to labour: 0

### Plans for 2025

- % of employees signed off on Interpump Group's 3 Policies: Goal 100%
  - Supplier audits to be conducted
  - Revising the supplier audit form to include a question regarding supplier policies regarding child and forced labour for future supplier audits
  - Begin to re-certify suppliers adhere to Interpump Group Policies
  - Training hours for internal staff
  - Further investigation on Country of Origin of Tier 1 suppliers
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## **8. Approval and Attestation**

This report was approved and has been signed by an authorized officer as per the requirements of the Act.

I, Stephan Bohner, certify that the information contained in this report is true, accurate, and complete, and meets the requirements of Bill S-211

Signed,

A handwritten signature in black ink, appearing to be 'SB' with a stylized flourish.

Stephan Bohner, CEO  
Hydra Dyne Technology Inc.  
Date: May 31, 2025