

Modern Slavery Statement for the Financial Year ended 2023

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by ASC Engineered Solutions, LLC and its affiliated entities (“ASC”) to identify and address the risks of forced labor and child labor in its business operations and supply chains during the financial year commencing January 2023 and ending December 2023.

ASC does not tolerate any form of child labor in our supply chain. ASC expects our Suppliers to prohibit child labor in their operations and encourages our Suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

ASC does not tolerate any form of abusive or illegal labor in our supply chain such as forced labor or human trafficking. ASC requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including but not limited to any form of prison, slave, bonded or forced indentured labor. The recruitment, transportation, transfer, harboring, or receipt of persons, by means of threat or use of force, coercion, or other means, for the purpose of exploiting them is prohibited. In advance of employment, workers are provided accurate and understandable information about the basic terms of their employment clearly stating their rights and responsibilities as well as information on wages, hours, and holidays. Workers are free to leave work and terminate their employment upon reasonable notice without penalty and employers must not retain any personal identification, travel documents or wages as conditions of employment. Job seekers and current employees are not charged or required to pay fees or deposits to gain or maintain their employment.

ASC Engineered Solutions, LLC a Delaware limited liability company, was established in 2019 after the merger of Anvil International and Smith-Cooper International. It trades under the business name ASC Engineered Solutions, LLC, with its head office located in Oakbrook, IL 60523, USA. Ward Manufacturing, LLC is a subsidiary of ASC Engineered Solutions, LLC.

ASC is committed to engaging in employment practices that meet all ethical and legal standards, including laws and regulations related to forced and child labour, in the markets in which it operates. ASC requests suppliers to commit to the ASC Supplier code of conduct that also establishes that each party in the supply chain will meet all applicable ethical and legal standards, including laws and regulations related to forced and child labour.

ASC is deeply committed to ensuring that forced labor and child labor have no place in its operations or supply chain. Although our primary operations are based in North America, we recognize the complexities and global reach of our supply chain.

ASC's approach involves evaluating and reassessing both our internal operations and those of our supply chain partners. By identifying areas of highest risk, we can allocate resources effectively to mitigate and manage potential labor violations. This commitment reflects our dedication to ethical business practices and our responsibility to uphold human rights across all facets of our supply chain.

The Company's efforts are ongoing, and we remain vigilant in our pursuit to protect vulnerable workers and ensure compliance with international labor standards. We believe that by working collaboratively with our partners and stakeholders, we can foster a safer, more equitable global work environment.

To uphold our commitment to eradicating forced and child labor in our supply chain, ASC has implemented a series of comprehensive actions. We have established a robust Supplier Code of Conduct that explicitly prohibits forced labor and child labor. Both ASC and the supplier review this Code of Conduct, and both parties sign to acknowledge their understanding and commitment to its terms. This Code of Conduct includes provisions for ASC to discontinue the business relationship if the supplier fails to meet these expectations.

ASC works collaboratively with suppliers to review and understand the expectations outlined in the Code, ensuring that suppliers are fully aware of our standards and the importance we place on ethical labor practices. With the support of the ASC Sourcing Team, Quality Assurance Team, and Trade Compliance Team, we closely monitor and audit suppliers to ensure compliance with the Supplier Code of Conduct. These teams conduct regular and thorough assessments, identifying any areas of concern and ensuring immediate action is taken if any violations are found. Additionally, the ASC Quality Assurance Team and Sourcing Team actively visit suppliers as needed, incorporating observations of adherence to the Supplier Code of Conduct into their evaluations.

ASC is actively continuing to refine its action plan to address forced labor and child labor. This includes creating additional due diligence policies, processes and employee training to identify, address, and prohibit such practices in our operations and supply chains. Through these

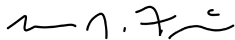
comprehensive efforts, ASC strives to maintain a supply chain free from forced and child labor, reflecting our core values of integrity, responsibility, and respect for human rights.

As of December 31, 2023, ASC has not faced situations of forced labor or child labor and has therefore not had to remedy and rectify such situations.

Reporting entity's legal name: ASC Engineered Solutions, LLC
Financial reporting year: Year-Ended December 31, 2023
Joint report for the following entities: Ward Manufacturing, LLC

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act. In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for the 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. I have authority to bind ASC Engineered Solutions, LLC.

Signed,

A handwritten signature in black ink, appearing to read "Richard Fine", is written below the "Signed," text.

Richard Fine
General Counsel and Secretary
May 29, 2024