



## Modern Slavery Act Statement

For the Fiscal Year Ending March 31, 2024

### Introduction:

This document constitutes ATS Corporation's Modern Slavery Act Statement covering the fiscal year ending on March 31, 2024. The statement is made on behalf of ATS Corporation ("ATS") and its subsidiaries collectively referred to as "ATS" in this document.

Slavery and human trafficking are contrary to the values of ATS, and we do not tolerate slavery or human trafficking in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect our employees, contract workers, and members of the board of directors of ATS and its subsidiaries to act with integrity and comply at all times with the laws, regulations, and rules that apply to ATS in the jurisdictions where we operate. If instances arise where these expectations are not met, we strive to respond in a timely and appropriate manner. ATS continues to prioritize ethical sourcing practices which uphold human rights and environmental protection across its global supply chain activities in accordance with UK *Modern Slavery Act*, and Canada's *Fighting Against Forced Labour and Child Labour in Supply Chain Act*.

### Who we are and our structure:

ATS is a global automation solutions provider in the Life Sciences, Consumer Products, Electronics, Energy, Food & Beverages, Mobility, Nuclear, Packaging and Warehousing & Distribution industries. ATS employs over 7000 people at more than 65 manufacturing facilities and over 85 offices in North America, Europe, Southeast Asia, and Oceania. ATS headquarters is in Cambridge, Ontario, Canada and is listed on the Toronto Stock Exchange and the New York Stock Exchange. We operate around the world both directly and through our subsidiaries.

### Our Business:

- **Advanced Applications** - Innovative SAP partner for manufacturing companies in the high-tech, medical technology, automotive, mechanical and plant engineering, plastics, and process manufacturing / pharmaceuticals industries.
- **ATS Industrial Automation** - End-to-end automated assembly and test solutions, delivering smarter solutions in Mobility, Nuclear, Energy, Warehousing & Distribution, Electronics, and Consumer Products.



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- **ATS Life Sciences Group** - Comprising ATS Life Sciences Systems, Comecer, BioDot, Avidity Science, and Scientific Products. Expertise across the supply chain for life sciences companies and OEMs.
- **ATS Life Sciences Scientific Products** - End to end custom factory automation solutions for medical devices, pharmaceuticals, and radio pharma.
- **ATS Life Sciences Systems** - A market leader for high-value automated solutions for medical devices, diagnostics, and pharmaceutical manufacturers. Innovation and dependability for complex needs.
- **Avidity Science** - A growing designer and manufacturer of automated water purification solutions for biomedical and life science applications.
- **BioDot** - Manufactures automated fluid dispensing systems for point-of-care and clinical diagnostic labs.
- **BLSG** - A consulting company specializing in process engineering and operational excellence that adds to our PA business' capacity to serve customers from problem identification to solution implementation.
- **CFT** - Global supplier of automated processing and packaging equipment to the food & beverage equipment market.
- **CFT Robotics** - Specializes in automated solutions for primary and secondary packaging equipment, sorting and product treatment.
- **CIM** - An industrial automation system integrator with automation and service capabilities for biopharma, pharmaceutical and other industries while also enhancing our digital strategy.
- **COMAC** - Designs and produces kegging, bottling and canning plants for beer, wine, and soft drinks.
- **COMECER** - A leader in designing, engineering, manufacturing, and servicing advanced aseptic containment and processing systems for the nuclear medicine and pharmaceutical industries.
- **DF** - A specialized manufacturer of pharmaceutical processing and packaging equipment and systems.
- **HSG** - An automation system integrator primarily serving the pharmaceutical sector.
- **Illuminate Manufacturing Intelligence** - Connected factory floor management system maximizing the efficiency for manufacturing environments.
- **INIMCO** - Offers knowledge, resources and IoT-based solutions for the process and manufacturing industry. Allows customers to gain insights into their machine and productivity data, improve operational efficiency and engage with third parties.



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- **IAP Industrial Automation Partners** - Design and implement control applications for production processes, ensuring information flows around complex technical processes are properly managed.
- **IWK** - Development and production of leading-edge technology of tube filling and cartoning machines.
- **MARCO** - Yield control and recipe formulation systems to help customers in the food, nutraceuticals and cosmetics sectors increase productivity and meet stringent industry regulations.
- **NCC Automated Systems** - Provides engineered-to-order sanitary automation solutions and stand-alone precision conveyance equipment that serves customers in several attractive sectors.
- **NUTRA-PACK Systems** - Packaging equipment including unscramblers, tablet counters, cappers, sleeves, case packers and palletizers. to automate your nutraceutical packaging operations.
- **Process Automation Solutions** - Provides engineering, system integration and production control solutions, automating plants in the process and manufacturing industries.
- **RAYTEC** - Producer of optical sorters and x-ray inspection machines for the food sector.
- **ROLEC** - Supplies solutions for the brewery and beverage industry including small craft and medium sized industrial breweries.
- **SIAPI** - Designs and manufactures linear blow molding machines for PET containers.
- **SYMPHONI** - Digital assembly automation technology featuring an unmatched combination of speed, versatility, and precision.

### Risks of modern slavery in our supply chain

According to the U.S. State Department 2023 Trafficking in Persons Report<sup>1</sup> employees in the automation industry in the countries where we operate are low risk for modern slavery. We recognize we may be indirectly linked to the risk of modern slavery as a result of our business activities such as importing products, and we are aware that certain sectors may pose a higher risk of modern slavery and environmental protection.

ATS manages these risks through our frameworks, policies, and due diligence processes implemented in this fiscal year. ATS supply chain involves purchasing a broad range of goods and services from international, national, regional, and local suppliers.

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<sup>1</sup> - <https://www.state.gov/reports/2023-trafficking-in-persons-report/>



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We follow a fair process of identifying, assessing, and monitoring areas in our supply chain where there may be risks of modern slavery and environmental concerns. Our principal supply chain includes suppliers of technology, software, management services, and various other professional services.

### Our Policies

#### **Code of Business Conduct**

ATS recognizes that respecting human rights is a shared responsibility of all entities regardless of where they operate globally. This perspective aligns with our values and is reflected in our policies. Our Code of Business Conduct<sup>2</sup> guides us and sets expectations for our behavior and decision making. Our Code of Business Conduct is the business practice we follow to ensure the highest integrity and ethics while we service our customers globally. It lays the foundation for how we work together in a respectful, transparent, and fair environment. It forms the basis for all our relationships and applies to all directors, officers, employees, and contractor workers of ATS and its subsidiaries.

We require actual or possible violations of our Code of Business Conduct to be reported and we take appropriate action to review and address the issues related to human rights and environmental protection.

To build and maintain the trust of our customers, employees, communities and shareholders, the board establishes the tone from the top and champions our values set out in our Code of Business Conduct.

#### **Supplier Code of Conduct**

Our Supplier Code of Conduct<sup>3</sup> requires our suppliers and subcontractors to abide by applicable laws and regulations in respective jurisdictions. We expect suppliers and subcontractors to be committed to non-discrimination principles and to not operate in a way that unfairly differentiates individuals.

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<sup>2</sup> - ATS Code of Business Conduct

<sup>3</sup> - ATS Supplier Code of Conduct



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Where we are satisfied that a supplier's policies and procedures are at least equivalent to the Supplier Code of Conduct, we may accept a supplier's commitment to comply with their own policies and procedures.

### **Supplier Due Diligence Policy**

Our Supplier Due Diligence Policy<sup>4</sup> requires our suppliers and subcontractors to demonstrate that they have policies and procedures in place to confirm that:

- Child forced or compulsory labour is not used.
- Discrimination and harassment are prohibited.
- Appropriate Labour rights are ensured.
- Appropriate environmental protection measures are used.

### **Due Diligence Processes**

Risk Management:

We have a comprehensive risk assessment and due diligence program in place for suppliers including acknowledgement of ATS's Supplier Code of Conduct. We risk assess suppliers at the beginning of the business relationship, track changes in their risk profiles on an ongoing basis through a due diligence questionnaire which covers both areas of human rights and environmental protection. A risk mapping exercise is undertaken to provide a risk profile to each supplier and based on the risk profile, appropriate mitigation actions are issued to mitigate the risks. ATS aims to prevent and mitigate adverse impacts through these mitigation actions. Additional due diligence such as third-party screening or on-site audits may be conducted if the risk profile is high based on several factors such as recent complaints, lack of progress in mitigation actions or geographic location deemed to be of high risk.

Complaints & Remediation:

Our Code of Business Conduct and Supplier Code of Conduct require all employees, contract workers, and suppliers to report actual or possible misconduct or violation of policies. Employees and contract workers are encouraged to speak to their managers, human resources, senior management, or report through the Hotline set up for this purpose.

The Hotline is available to all employees, contract workers, and potential externally aggrieved parties as applicable in respective jurisdictions. The Hotline is secure, fully accessible, and

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<sup>4</sup> - ATS Supplier Due Diligence Policy



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available 24/7. It is administered by a third party and reports may be made anonymously. ATS has a strict non-retaliation commitment for such reporting. The issues reported are objectively reviewed and resolved quickly through due diligence actions if suppliers or subcontractors are involved.

Consequences of non-adherence:

If our due diligence questionnaire, audits, or third-party screening reveal infringement of our requirements, they must be remedied by the supplier in question within a reasonable time period. In addition, the suppliers involved must agree to implement the corrective actions as defined in the action reports or audit findings report. We reserve the right to end the supplier relationship in the event serious infringements are not addressed adequately or when the supplier is nonresponsive and explicitly refuses to act on infringements which perpetuate slavery, servitude, human trafficking, forced labour, child labour, or environmental exploitation.

Our Training:

Understanding and complying with the Code of Business Conduct is a condition of working at ATS, and employees and contract workers must complete the assigned training courses and acknowledgement annually. We leverage this mandatory annual training to raise awareness of our employees and contract workers of possible violation of human rights. Similar mandatory training is leveraged for environmental protection requirements as well. Specific additional training is provided as needed to ensure necessary competency in performing the tasks of every role in a consistent manner across the organization.

### Assessing our effectiveness

We intend to continue to assess the effectiveness of this program on an annual basis through established key risk Indicators set up for this purpose. Our commitment to continuous improvement will ensure that we improve the effectiveness of the program and address any risks that may arise in our supply chain related to human rights and environmental protection. No instances were raised for review in this fiscal year, and there was no modern slavery, human trafficking, forced labour, child labour, or environmental incidents related to our suppliers identified through our supplier monitoring procedures.



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### Our Commitment

ATS remains committed to preventing slavery, human trafficking, and environmental exploitation from taking place in our businesses and in our supply chains. We will continue to review our policies, procedures, and practices periodically to determine any enhancements we can make to prevent modern slavery and human trafficking.

### Approval for this Statement

This statement was approved by the Board of Directors of ATS Corporation on behalf of ATS Corporation and its subsidiaries with respect to the fiscal year ending on March 31<sup>st</sup>, 2024.

A handwritten signature in black ink, appearing to read "Andrew Hider", is written over a horizontal dashed line.

Andrew Hider

Chief Executive Officer, Board Director,

ATS Corporation

May 15, 2024



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### Canada Annex

#### Additional Information Specific to

#### ***Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act***

##### **Reporting Context:**

ATS Corporation ("ATS") is a provincially incorporated entity subject to the legal requirements in Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This Annex is a report made pursuant to the Act and was approved by the Board of Directors) on May 15<sup>th</sup>, 2024.

This report covers ATS' last fiscal year, April 1<sup>st</sup>, 2023, to March 31<sup>st</sup>, 2024 (the "reporting period").

This is a joint report filed by ATS on behalf of itself and its subsidiaries, ATS Industrial Automation Inc. and ATS Process Automation Solutions Corp. ("reporting subsidiaries"). The reporting subsidiaries were wholly owned and/or operated by ATS during the reporting period. The information provided below applies to ATS and to the reporting subsidiaries.

##### **Structure, Activities and Supply Chain:**

ATS is the sole parent company of all the reporting subsidiaries and is headquartered in Cambridge, Ontario. ATS Corporation and its reporting subsidiaries are engaged in manufacturing, selling, distributing, and importing goods into Canada to manufacture goods in Canada, as well as the provision of services.

ATS supply chain involves purchasing a broad range of goods and services from international, national, regional, and local suppliers. ATS also exports its finished products to customers that we serve globally. Our principal supply chain includes suppliers of technology, software, management services, and components.

##### **Policies and Due Diligence:**

During the reporting period, ATS implemented a revised Supplier Code of Conduct which includes prohibitions on the use of forced labour and child labour along with other Human Rights focus areas included in our Supply Chain Due Diligence Policy. The policy outlines the necessary due diligence related to forced and child labour in our supply chain.





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Our due diligence process includes the following:

- Supplier acknowledgement of ATS's Supplier Code of Conduct.
- Ongoing risk assessment and monitoring of the suppliers.
- Ongoing risk mapping of suppliers based on risk profile.
- Due diligence questionnaire to review the policies and procedures that the supplier has put in place to prevent forced and child labour in their operations and supply chain.
- Working with our suppliers to mitigate any risks identified through action reports.
- Establishing a complaints and remediation processes for forced and child labour reporting through a 24/7 hotline.

### **Risk Management:**

ATS's major risk exposure to forced labour and child labour is through its suppliers operating in high-risk geographies. We recognize the potential risks of forced labour and child labour in our extended supply chain and the complexity and challenges in operationalizing modern anti-slavery compliance.

During the reporting period, ATS established a cross functional team of various internal stakeholders to examine our supply chain for high-risk activities related to forced labour and child labour risks. As part of this analysis, a risk review was conducted to identify geographical regions with high-risk exposure and the locations of global suppliers to ATS Corporation and the reporting entities.

The following activities were part of the review:

- Establishing a core team consisting of internal stakeholders with responsibility for supply chain management to align and further enhance due diligence and risk management activities related to supply chain due diligence on matters including forced labour, child labour and other human rights.
- Ongoing mapping of our supply chain with direct suppliers (Tier 1) and their suppliers (Tier 2) through our supplier due diligence program.
- Reviewing internal policies to implement a new Supply Chain Due Diligence Policy and updated Supplier Code of Conduct to outline the due diligence processes to prevent child labour and forced labour in our supply chain.
- Reviewing internal processes to report suspicious and actual violations of our Supply Chain Due Diligence Policy and Supplier Code of Conduct.
- Initiated ongoing improvements to internal supply chain processes, policies, and training.



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Based on an initial risk assessment of our supply chain activities, our supply chain appeared to be at low risk for forced labour and child labour. The initial risk assessment relates to our supply chain activities during the reporting period based on available information. Work continues on monitoring supplier activities efficiently and effectively with respect to forced labour and child labour compliance and on developing an internal risk matrix that is sensitive to changes in high-risk categories and geographic locations.

### **Remediation Measures**

To identify risks of forced labour or child labour in our supply chain during the reporting period, we primarily focused on understanding the operations of Tier1 and Tier 2 suppliers in accordance with our Supply Chain Due Diligence Policy.

During the reporting period, we did not identify any evidence of forced labour or child labour in our supply chains. No remediation measures were necessary to compensate loss of income to vulnerable families.

### **Training and Awareness**

All employees are required to participate in training in our Code of Business Conduct each year. The training emphasizes compliance with all applicable laws in the jurisdictions in which we operate. Every member of ATS, including those working for reporting subsidiaries, are expected to read, understand, and comply with the principles and requirements set out in the Code of Business Conduct. The training is approximately 30-45 minutes in length and contains a knowledge check test and certification.

Additionally, we conducted specialized training sessions in supply chain for individuals who are involved in the due diligence process due to their role or function. This dual layered training framework underscores our commitment to foster a culture that actively champions human rights across all facets of our operations and in supply chain.



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### Assessment of Effectiveness

We intend to perform an annual review of the policies, procedures, and due diligence processes in areas including Supply Chain and Enterprise Risk Management (ERM) with input from various stakeholders across our businesses. We also perform risk-based activities on a regular basis, which can range from specific social audits, action reports, and effectiveness reviews of implemented risk mitigation measures in our supply chain.

While we believe in the effectiveness of the measures we have implemented to prevent and mitigate forced labour and child labour within our supply chain, we strive to maintain and continually improve the program and its effectiveness. We will continue to improve the transparency in our supply chain by leveraging our relationships with our suppliers and building joint solutions to protect the human rights of the individuals who make up our supply chain.

### Report Approval and Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (Canada), 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 aspects for the purposes of the Act, for the reporting period listed above.

A handwritten signature in black ink, appearing to read "Andrew Hider", written over a horizontal dashed line.

Andrew Hider

Chief Executive Officer, Board Director,

ATS Corporation

May 15, 2024