



---

17 Elm Drive South • Wallaceburg • Ontario • Canada • N8A 5E8 • Tel: 519-627 6078 • Fax: 519 627 5925

## **Modern Slavery Statement for the Financial Year ended 2023**

At AarKel Tool and Die Inc, we are committed to upholding the highest standards of ethics and integrity in all aspects of our business operations. We recognize the responsibility we must respect and uphold human rights, including combating modern slavery and human trafficking in all its forms. This statement outlines our commitment to preventing modern slavery within our own operations and supply chain.

### **Our Business**

AarKel Tool and Die is in the industry of manufacturing plastic injection moulds and die cast moulds. The moulds are shipped from our Wallaceburg facility to Canada/US and Mexico. The AarKel Tool and Die plant is a 135,000 ft facility and employs 185 people, which includes 183 full-time and 2 part-time employees. Our facility is located at: 17 Elm Dr. S. Wallaceburg, ON N8A 5E8.

### **Action Plan**

In response to the urgent need to address modern slavery and human trafficking, we have developed this action plan to comply with the Modern Slavery Act. This plan outlines our commitment to combatting these grave violations of human rights within our operations and supply chains. Through rigorous policies, diligent due diligence, and collaborative efforts, we aim to uphold our ethical standards and contribute to the global fight against modern slavery. This plan serves as our roadmap toward a more just and responsible future.

### **Completed Steps**

#### **Policy Development:**

We have developed a comprehensive modern slavery and human trafficking policy and communicated it to all stakeholders.

#### **Employee Training and Awareness:**

Comprehensive training for employees has been completed.

## **Ongoing Steps**

### **Risk Assessment and Due Diligence:**

A thorough risk assessment has been conducted, and due diligence processes are being implemented to mitigate identified risks.

### **Supplier Engagement:**

Engagement with suppliers has begun, and expectations regarding ethical standards are being communicated.

### **Continuous Improvement:**

We are continuously reviewing and updating our action plan based on emerging risks and feedback from stakeholders.

## **Scheduled Steps**

### **Reporting and Transparency:**

We are planning the implementation of robust reporting mechanisms and the publication of annual statements in accordance with the Modern Slavery Act.

### **Training:**

Training for employees on identifying and reporting signs of modern slavery has been completed. While some steps of our action plan have been completed, others are still in progress or scheduled. We remain committed to combatting modern slavery and human trafficking within our operations and supply chains.

We have also completed training with all of our employees regarding Bill S-211 during training sessions on May 7, 2024. Evidence of training is available upon request. Training will be conducted annually.

Below are AarKel Tool and Die's Policies and Procedures that include Fighting against Forced Labour and Child Labour.

Corporate and Social Responsibility Policy

Code of Conduct and Ethics Policy

Selection and Control of Suppliers and Contractors Procedure

Supplier Corporate Social Responsibility Compliance Letter



17 Elm Drive South • Wallaceburg • Ontario • Canada • N8A 5E8 • Tel: 519-627-6078 • Fax: 519-627-5925

## **Our Policies**

We have developed and implemented robust policies and procedures to prevent modern slavery and human trafficking within our operations and supply chain. These include:

**Supplier Code of Conduct:** We require all our suppliers and business partners to adhere to our Supplier Code of Conduct, which prohibits the use of forced labor, child labor, and any form of human trafficking.

**Due Diligence:** We conduct due diligence on our suppliers to assess the risk of modern slavery in our supply chain.

**Supplier Management:** All suppliers that provide services or products that directly affect our product quality shall be listed as active and on the approved supplier list maintained in the ERP system. Supplier audits are conducted by AarKel personnel depending on how critical or complex the product or service will be.

**Liability Insurance:** The Supplier/Outsource will provide a copy of their Certificate of Insurance for Liability where AarKel Tool and Die is listed as one of the named holders. The certificate is to be returned to AarKel with the Supplier Quality System Survey.

**Vendor Setup:** Following approval of the Supplier Quality System Survey, an internal Vendor Setup Request form (FM-PUR-07) must be completed and forwarded to the Finance Department for approval of terms before a Supplier can be set up.

**Document Management:** Purchasing will be responsible for logging all documents as required by this procedure and assuring that Suppliers are notified when documents expire and need to be replaced by the Suppliers.

## **Supply Chain**

AarKel Tool and Die has 153 suppliers which are located across Canada/US/Mexico/China and India. AarKel Tool and Die gives each supplier a copy of our Supplier Corporate Social Responsibility Compliance Letter that they are required to read, sign and return to demonstrate compliance.

## **Our Commitment**

AarKel Tool and Die Inc is committed to continuously improving our efforts to prevent modern slavery and human trafficking. We recognize that eradicating these practices requires ongoing vigilance, collaboration, and transparency across our organization and throughout our supply chain.



17 Elm Drive South • Wallaceburg • Ontario • Canada • N8A 5E8 • Tel: 519 627 6078 • Fax: 519 627-5925

## **Conclusion**

AarKel Tool and Die Inc is unwavering in our commitment to upholding human rights and combating modern slavery and human trafficking. We will continue to work diligently to ensure that our operations and supply chain are free from these abuses, and we will hold ourselves and our partners accountable for maintaining the highest ethical standards.

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 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.

**I have the authority to bind AarKel Tool and Die Inc.**

A handwritten signature in black ink, appearing to read 'Larry Delaey', is written over a light blue circular stamp.

**Larry Delaey**  
**President / CEO**  
**AarKel Tool and Die Inc.**  
**May 17, 2024**