

## **ADDÉNERGIE TECHNOLOGIES INC. DBA FLO**

### **2024 Report on Efforts to Prevent Forced Labour and Child Labour**

FLO is committed to conducting business ethically, responsibly, and in compliance with applicable laws and regulations. The *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (“**Act**”) requires reporting entities to publish annual public reports about the measures that they have taken to address and prevent forced labour and child labour in their supply chains during their previous fiscal year. This 2024 Report on Efforts to Prevent Forced Labour and Child Labour reflects FLO’s progress during its fiscal year ending March 31, 2024 (“**FY24**”) and its ongoing efforts to identify, mitigate, and prevent the risk of forced labour and child labour being used in its supply chain and procurement operations.

For the purposes of the Act, this 2024 Report on Efforts to Prevent Forced and Child Labour is a joint report made on behalf of AddÉnergie Technologies Inc. dba FLO (a Canadian corporation) and its wholly owned subsidiaries that meet the size thresholds in the Act, Services FLO Inc. (a Canadian corporation) and FLO Services USA Inc. (a Delaware corporation). The term “**FLO**” as used in this 2024 Report on Efforts to Prevent Forced Labour and Child Labour refers collectively to AddÉnergie Technologies Inc. dba FLO and the two wholly owned subsidiaries listed in the previous sentence.

#### **1. Our Business**

Founded in 2007 and with nearly 600 employees, FLO is a leading North American electric vehicle (EV) charging network operator and a manufacturer of smart charging solutions. We help overcome climate change and accelerate EV adoption through our vertically integrated business model and by delivering EV drivers the best charging experience from curbside to countryside. Every month, we enable more than 1.5 million charging events thanks to over 100,000 fast and level 2 EV charging stations deployed at public, private, and residential locations. FLO is headquartered in Quebec City, Quebec, operates assembly plants in Shawinigan, Quebec and Auburn Hills, Michigan, and operates its network across Canada and the United States. More information about our company is available at [www.flo.com](http://www.flo.com).

#### **2. Management and Oversight of our Supply Chain**

At FLO, we believe that a strong commitment to ethical supply chains starts with strong leadership in manufacturing, procurement, and logistics. It’s one of the reasons FLO appointed a Chief Manufacturing Operations Officer in February 2023 to oversee its procurement process and all aspects of supplier assessment. The Chief Manufacturing Operations Officer is ultimately accountable to FLO’s executive committee and board of directors for governance within this area and regularly liaises with both corporate bodies to ensure that FLO’s manufacturing operations align with FLO’s organizational goals, commitment to corporate responsibility, and legal compliance obligations.

Appointing an executive-level member to head FLO’s manufacturing operations has also been instrumental in incorporating supplier risk assessment into FLO’s broader assessment of

enterprise risk and in promoting clear and consistent communication throughout the organization about FLO's efforts to identify, mitigate, and prevent forced labour and child labour in its supply chain and procurement operations.

A dedicated team of procurement professionals, led by FLO's Supply Chain Director, supports the Chief Manufacturing Operations Officer in the day-to-day management and operations of FLO's supply chain. The Supply Chain team also receives advice from FLO's Legal team and Environmental, Social, and Governance ("ESG") team in identifying areas of FLO's supply chain that could present a risk of forced labour or child labour, and more generally to ensure that FLO's supply chain operations comply with applicable laws and regulations as well as FLO's ESG commitments. We believe our integrated and cross-functional approach to overseeing supply chain risk helps us focus on our commitments and avoid blind spots.

### **3. FLO's Policies**

#### **a. FLO's Supplier Code of Conduct**

In FY24, FLO developed the first iteration of its Supplier Code of Conduct. FLO will publish the Supplier Code of Conduct in French and English, make it publicly available on FLO's website, and require all its suppliers to comply with it beginning next fiscal year. If a supplier is unwilling or unable to meet the requirements set out in FLO's Supplier Code of Conduct, the supplier will risk being removed from FLO's supply chain.

The Supplier Code of Conduct expressly prohibits the use of forced labour or child labor, emphasizing the importance of voluntary work arrangements and adherence to the International Labour Organization ("ILO") Conventions on child labour to eradicate child labor practices. The Supplier Code of Conduct also addresses the following topics (revisions may apply in published document):

- Anti-harassment and abuse: Suppliers are required to maintain a workplace free of harassment and abuse, prohibiting practices such as verbal abuse, psychological harassment, and sexual harassment.
- Prevention of Involuntary Labor and Human Trafficking: Suppliers must ensure that all work is voluntary and refrain from using any form of slave, forced, bonded, or prison labor. Additionally, suppliers are prohibited from withholding workers' original identification documents and imposing unreasonable restrictions on movement within the workplace.
- Prevention of Underage Labor: Suppliers must only employ workers who meet the minimum legal age for employment and ensure that juvenile workers are not subjected to work that jeopardizes their health, safety, or morals.
- Juvenile Worker Protection: Suppliers may employ juveniles aged between the legal minimum age and 18 years, provided their work does not endanger their well-being or involve overtime or nighttime shifts.
- Working Hours: Suppliers must adhere to ILO standards on working time.

- **Wages and Benefits:** Suppliers must pay at least the minimum wage, provide required benefits, and compensate workers for overtime at the legal premium rate. All wage-related practices must comply with local laws and regulations.

**b. FLO's Procurement Policy**

In FY24, FLO also enhanced its supply chain governance by developing an internal Procurement Policy. This policy strictly prohibits the use of forced labour and child labour in our business and supply chain. It also reinforces our commitment to regular identification and mitigation of potential forced labour and child labour risks by establishing formal supplier screening procedures and supplier selection criteria, which include compliance with legal and ethical standards.

**c. FLO's Code of Ethics**

Since 2022, FLO has operated under a Code of Ethics, which establishes the ethical rules, standards of conduct, and business practices that all of its employees, officers, and directors must adhere to in the workplace. FLO's Code of Ethics emphasizes the values of honesty, fairness, and integrity, and underscores an organizational commitment to professional responsibility and compliance with internal policies, industry best practices, and applicable laws and regulations. It also prescribes, among other things, the conduct of appropriate due diligence before selecting suppliers.

**d. FLO's ESG Policy**

FLO's ESG Policy sets out FLO's commitment to embed environmental stewardship, accessibility, and sound governance practices into our business activities. We recognize that engaging in responsible business practices is necessary to ensure FLO's long-term success and we believe that upholding robust ESG practices will create long-term value for our customers, employees, shareholders and the communities in which we operate. Our ESG Policy applies to all our operations, employees, suppliers, and contractors, and we call on all our stakeholders to continually engage in how we integrate ESG into the way we operate. We strive to integrate ESG into our operations in several ways, including by setting clear objectives and accountability for ESG and regularly monitoring our ESG performance and that of our vendors, and by maintaining high ethical standards within and outside of the workplace by championing honesty, professional responsibility, and compliance with FLO's standards.

**4. Evaluating and Managing Risk of Forced or Child Labour in FLO's Supply Chain**

**a. Identification of Forced Labour and Child Labour Risks**

FLO recognizes that identifying the risk of forced labour or child labour in its supply chain is the first step to addressing such risk. As noted throughout this 2024 Report on Efforts to Prevent Forced Labour and Child Labour, FLO takes the identification and mitigation of such risks seriously. To date, FLO has not identified any use of forced labour or child labour in its supply chain.

Having said that, FLO has identified that its manufacturing of electric vehicle supply equipment (“EVSE”) and the procurement of the necessary products and parts to produce EVSE to be the business function that carries the greatest risk of forced labour or child labour in its supply chain. As noted below, most of FLO’s procurement expenditure was allocated to suppliers based in Canada and the United States. However, FLO also procures items from many other countries globally including France, Germany, Japan, Singapore, China, and Vietnam. FLO is focused on ensuring that the products and parts procured from these countries are not produced in whole or in part with forced labour or child labour. FLO will continue to monitor these activities on an ongoing basis.

#### **b. Supplier Screening and Due Diligence**

In FY24, FLO improved its policies and systems for identifying and mitigating forced labour and child labour risk by developing (in FLO’s Procurement Policy) a formal screening process designed to assess suppliers prior to onboarding. This screening process investigates key risk factors including geographic risk, manufacturing process risk, the supplier’s own supply chain risks, and the supplier’s policies and procedures for mitigating those risks. If the supplier screening process identifies that the supplier might use or benefit from forced labour or child labour at any point in its supply chain, FLO will decline to engage with that supplier.

Moreover, FLO has developed requirements for construction and installation contractors to provide all applicable business licenses, permits, and compliance certificates (including CNESST confirmations for operations in Quebec) during contractor onboarding.

During the supplier screening process, we have also occasionally conducted onsite assessments. While these onsite assessments have tended to focus on evaluating supplier capabilities and reliability, they have also been used to review health and safety risks. Our Supply Chain team recognizes that onsite assessments present an excellent opportunity to review human rights risks more systematically along with other supply chain risks that FLO already assesses when onsite. To this end, FLO has committed to developing an ESG-related questionnaire to guide its supplier assessment during onsite visits. The questionnaire will help FLO assess compliance by its suppliers with FLO’s Supplier Code of Conduct.

#### **c. Responsible Procurement**

FLO’s ESG Policy requires our Supply Chain team to assess and monitor the ESG performance of our suppliers and, where appropriate, to source materials locally and from recycled sources in order to help mitigate risks to people and the environment. Accordingly, FLO has demonstrated a preference for nurturing relationships with domestic and regional suppliers. For example, in FY24 most of our procurement expenditure was allocated to suppliers based in Canada and the United States. Not only does this reflect our ESG commitments, it also dovetails with our deeply Canadian roots, our ambition to become a North American flagship, and our commitment to parts quality and product reliability. This North American focus has also played a role in mitigating the risk that forced labour and child labour is used in our supply chain, because it has kept our supply chain

significantly based in two countries – Canada and the United States – that have strong commitments to human rights, are actively committed to eliminating forced labour and child labour, and have implemented robust statutory frameworks to enforce these commitments.

#### **d. Reporting Concerns**

FLO has systems and processes for receiving and investigating potential violations of its policies or applicable laws and regulations. Its Whistleblower Policy applies to all employees, officers, and directors of the company, and sets out FLO's approach to protecting individuals who report potential misconduct. FLO encourages its employees to raise any concerns they have about violations of FLO's Code of Ethics, FLO's policies, including FLO's ESG Policy, or legal or regulatory requirements.

#### **5. Remediation Measures and Remediation of Loss of Income**

As noted above, during FY24, FLO did not identify any use of forced labour or child labour in its supply chain. FLO has therefore not taken any steps to remediate the use of such forced labour or child labour. FLO has also not taken any measures to remediate loss of income to vulnerable families because it does not believe there has been any such loss related to its supply chain decisions.

#### **6. Employee Training**

All FLO employees undergo mandatory training upon joining FLO and annually thereafter. FLO's training program currently requires all employees to read and acknowledge FLO's core policies, including our Code of Ethics and Whistleblower Policy. Standardized and recurring employee training helps every member of our workforce understand and execute on our organizational values, commitments, and obligations. It also fosters a culture of accountability, integrity, and respect across all levels of our operations.

While FLO does not currently provide employee training dedicated to identifying, mitigating, and preventing forced labor or child labor in its supply chain, FLO intends to implement mandatory training on these topics for members of its Supply Chain team next fiscal year.

#### **7. Assessing Effectiveness**

The Procurement Policy FLO developed in FY24 serves as a guiding framework for assessing the effectiveness of our risk mitigation measures. The Procurement Policy prescribes internal accountability for developing legal and ethical supply chain operations, defines risk assessment categories and processes based on supplier location and risk level, and establishes rules for barring or removing suppliers from our supply chain that are unwilling or unable to meet the requirements set out in our Supplier Code of Conduct. The effectiveness of FLO's supplier screening procedures is scheduled to be reviewed annually by FLO's Chief Manufacturing Operations Officer. During this annual review, FLO's Chief Manufacturing Operations Officer will oversee a review of randomly selected samples of the prior year's supplier screening outcomes and determine whether the procedures used during the screening process were sufficient.

## 8. Capability-Building Moving Forward

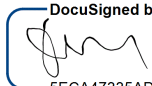
FLO intends to continue building its supply chain governance in the following ways next fiscal year:

- Policies: We will develop a Human Rights Policy that will outline how FLO treats individuals and business partners at every level of its supply chain. We are committed to respecting internationally recognized human rights, to mitigating the risks of human rights abuses, and to remedy any adverse human rights impacts arising from our supply chain. With those commitments in view, we expect to base our Human Rights Policy on the UN Guiding Principles on Business and Human Rights.
- Supplier Screening:
  - As described earlier, in our next fiscal year we plan to develop a self-assessment questionnaire for suppliers focused on various human rights and ESG concerns. This questionnaire will enable us to systematically and proactively screen suppliers against consistent, established standards and, thereby, enhance our ability to identify risks associated with forced or child labor and other human rights violations.
  - In addition to consistently and proactively screening suppliers, FLO also intends to implement a process for monitoring reports published by human rights advocacy groups and other civil society organizations that may alert FLO to specific geographic or business risks and aid its due diligence prior to selecting new suppliers.

## 9. Attestation of a Board Member

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.

- Thomas Werner
- Director
- 29/3/2024

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I have the authority to bind AddÉnergie Technologies Inc. dba FLO, Services FLO Inc., and FLO Services USA Inc.