

## **MODERN SLAVERY STATEMENT FOR FISCAL YEAR 2023**

#### Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") in Canada, UK Modern Slavery Act 2015 (the "UK MSA"), and the California Transparency in Supply Chains Act 2010 (the "CTSCA") require certain businesses to provide disclosures concerning their efforts to address forced and child labour, human trafficking and modern slavery in their supply chains.

This statement is made by Celestica Inc. for itself and Celestica group companies for the financial year ended December 31, 2023 (the "**Statement**"). Although not all Celestica entities are subject to the requirements of the Act, the UK MSA and/or the CTSCA, Celestica's policies and procedures apply across the Celestica group, as set out in the Statement. Any references to "Celestica" or "we", "us" or "our" herein refer to the Celestica group.

The following entities within the Celestica Group are reporting entities for the purposes of the Act: Celestica Inc. and Celestica International LP (collectively, the "Canadian Reporting Entities").

#### Celestica's Code of Conduct and Policies

Celestica is committed to complying with all applicable labour and employment laws, rules, and regulations, and working to mitigate the risk of forced and child labour, human trafficking and modern slavery in our business and supply chain.

We maintain a Business Conduct Governance Policy ("**BCG Policy**"), which outlines the ethics and practices we consider necessary for a positive working environment, as well as the high legal and ethical standards to which our employees are held accountable. In addition, we have well-established policies regarding fair labour practices and guidelines intended to create a respectful, safe and healthy work environment for our employees globally.

We are a founding (and remain a) member of the Responsible Business Alliance ("**RBA**"), a non-profit coalition of companies that, among other things, establishes standards for its members in responsible and ethical practices in the areas of labour, environmental compliance, employee health and safety, ethics, and social responsibility (the "**RBA Code of Conduct**").

At Celestica, we believe in maintaining the highest standards of ethical behaviour in all of our dealings including those with our customers and suppliers. We closely monitor all applicable laws, regulations, and customer requirements related to our operations and products in order to comply, including adherence to our BCG Policy and the RBA Code of Conduct. This commitment is reflected in the values we uphold and in the way in which we treat others with dignity, honesty, and respect.



#### A. Our Business

## **Business and Structure Overview**

Celestica Inc. (TSE and NYSE: CLE) is incorporated under the *Business Corporations Act* (Ontario), and its corporate headquarters are located in Toronto, Ontario. Celestica conducts its business through subsidiaries operating on a worldwide basis.

We deliver innovative supply chain solutions globally to customers in two operating and reporting segments: Advanced Technology Solutions ("ATS") and Connectivity & Cloud Solutions ("CCS"). Our ATS segment consists of our ATS end market, and is comprised of our Aerospace and Defense, Industrial, HealthTech, and Capital Equipment businesses. Our CCS segment consists of our Communications and Enterprise (servers and storage) end markets.

Our customers include original equipment manufacturers, cloud-based and other service providers, including hyper-scalers, and other companies in a wide range of industries. Our global headquarters are located in Toronto, Ontario, Canada and we have sites in Canada, the U.S., China, Ireland, Japan, Laos, Malaysia, Mexico, Romania, Singapore, South Korea, Spain, Indonesia, India, the Philippines and Thailand. We operate a network of sites and centers of excellence strategically located in North America, Europe and Asia, with specialized end-to-end supply chain capabilities tailored to meet specific market and customer product lifecycle requirements. As of December 31, 2023, we employed approximately 26,000 employees.

We offer a comprehensive range of product manufacturing and related supply chain services to customers in both of our segments, including design and development, new product introduction, engineering services, component sourcing, electronics manufacturing and assembly, testing, complex mechanical assembly, systems integration, precision machining, order fulfilment, logistics, asset management, product licensing, and after-market repair and return services. Our Hardware Platform Solutions offering (within our CCS segment) includes the development of infrastructure platforms, hardware and software design solutions, including open-source software that complements our hardware offerings, and services that can be used as-is, or customized for specific applications in collaboration with our customers, and management of program design and aspects of the supply chain, manufacturing, and after-market support, including IT asset disposition and asset management services.

A more detailed description of our business and operations can be found in our Annual Report on Form 20-F for the year ended December 31, 2023, which is available on our website at <a href="https://www.celestica.com">www.celestica.com</a>.

## **Suppliers for the Canadian Reporting Entities**

In 2023, the Canadian Reporting Entities engaged with suppliers that provided it with the following general categories of goods: electronic components, printed wiring boards, custom mechanical components, optical and storage components. These goods were imported or sourced primarily from the following regions: Asia, Europe and North America.



#### **B.** Our Policies

## **Our Policies**

At Celestica, we have adopted and audit our operations and supply chain to the RBA Code of Conduct. The RBA Code of Conduct outlines standards to ensure that working conditions in the operations and supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible. The standards set out in the RBA Code of Conduct reference international norms and standards, including the Universal Declaration of Human Rights, ILO International Labour Standards, OECD Guidelines for Multinational Enterprises, ISO and SA standards, and the UN Guiding Principles on Business & Human Rights.

We also maintain the following policies:

- BCG Policy for all employees, which outlines our expectations regarding ethics and compliance. This policy is available in English and is translated in the following languages Chinese, German, Indonesian, Japanese, Korean, Laotian, Malay, Romanian, Spanish (Latin American), Spanish (European), Thai and Vietnamese. The BCG Policy requires employees to report violations of the BCG Policy through various reporting channels. Employees have the option to remain anonymous in their reporting by using Celestica's Ethics Hotline or web based reporting. These third party managed channels are available globally in all Celestica languages and are operated 24 hours a day, 7 days a week. Confirmed violations of the BCG Policy can result in disciplinary action, up to and including termination.
- <u>Child Labour Prevention Policy</u> addresses our approach to preventing child labour within our operations and provides guidance to Celestica managers and employees should child labour be identified.
- Global Hours of Work Policy addresses our approach to employee working hours, work week hour limits, and compensation guidance for hours worked. This policy is based on the RBA Code of Conduct.
- Supply Chain Management Policy and Practices provides guidance for our employees to extend our BCG Policy to our suppliers, and requires that RBA labour and ethics standards are applied across our supply chain.
- Responsible Minerals Sourcing Policy outlines the requirements for our suppliers, and addresses our approach to the sustainable sourcing of specified minerals and their derivative metals, the diligence and disclosure of which is regulated by Rule 13p-1 under the Exchange Act, the US Securities and Exchange Commission rule implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "US Conflict Minerals Rule").

## **Ethics Reporting**

Celestica has implemented an ethics program to maintain a workplace of high ethical standards. This program is available on our website and intranet as well as contained in our BCG Policy. Ethics Awareness Centers are prominently posted at each of Celestica's sites providing all of the details around this program, including the local hotline number in each geography. In addition, Celestica has a dedicated mailbox to receive any compliance related inquiries or reports, including about its management of forced and child labour, human trafficking and modern slavery risks in its operations. Any concerns can be reported to compliance@celestica.com.



# **Recruitment and Employment Practices**

Celestica hires employees directly and conducts independent due diligence and checks on those employees, in compliance with our policies. We outsource some recruitment activity to external recruiters for specific roles.

Our <u>Ethical Labour Practices</u> address our approach to preventing child labour and ensuring the protection of foreign migrant workers and regulated working hours across Celestica. We ensure the above policies are available to all employees.

## C. Due Diligence

We carry out due diligence toward our suppliers, including taking the following steps:

- We provide an on-boarding "Welcome Package" to our new suppliers with reference to the RBA Code of Conduct and links to relevant Celestica policies;
- Celestica's standard terms and conditions provided to suppliers contain a requirement that the suppliers comply with the RBA Code of Conduct and the BCG. These terms and conditions are accepted by most but not all suppliers;
- In order to ensure compliance with section 321(b) of the Countering America's Adversaries Through Sanctions Acts ("CAATSA"), which creates an automatic presumption that any goods mined, produced, or manufactured wholly or in part by North Korean nationals or citizens, outside of North Korea, are considered to be produced through forced labour (and hence prohibited from importation under the US Tariff Act of 1930), new suppliers are requested to complete a supplier workforce composition surveys to identify North Korean labour presence and/or sign CAATSA declarations;
- In-scope suppliers are also requested to complete an affidavit and/or survey to determine compliance with Section 307 of the U.S. Tariff Act of 1930 (19 U.S.C. 1307) and all related laws which seek to enforce it:
- Celestica also keeps a Discontinued Supplier Relationship List ("DSRL"), which
  identifies the companies and/or individuals that Celestica cannot or does not want to
  purchase products or services from. Each organization within Celestica must review
  the DSRL prior to entering into a relationship with a new supplier; and
- For all suppliers governed by the Annual Supplier RBA Compliance Program, we conduct supplier qualification and verification programs as described below.

Suppliers that are part of the Annual Supplier RBA Compliance Program are subjected to the following due diligence:

Expected to complete the RBA Facility Risk Self-Assessment Questionnaire ("SAQ"), which is a risk-assessment tool that enables corporations to evaluate specific supply chain risk areas, including labour (targeted at the prevention of forced and child labour, human trafficking and modern slavery), health and safety, environment, and ethics. These suppliers are required to meet a minimum score to pass the self-assessment. Upon receipt of the SAQ, and depending on the answers, Celestica may also carry out a verification on the supplier;



- As part of the RBA Compliance Program, these suppliers may be assessed every two
  years through the RBA's Validated Assessment Program ("VAP") by a RBA
  independent third-party audit firm, which addresses, among others, issues relating to
  modern slavery and human trafficking. Celestica receives the VAP audit reports and,
  based on the outcomes of the audits, considers whether any follow-up action is
  necessary; and
- RBA compliance assessments of suppliers are scored pursuant to the SPOT Performance Scoring Process and suppliers are required to meet a minimum score to pass.

#### **Conflict Minerals**

Celestica is committed to a sustainable supply chain management, and we have adopted a Responsible Minerals Sourcing Policy to promote the sustainable sourcing of minerals in the products that we manufacture. While Celestica does not directly source minerals from mines, Celestica recognises the need to address extractives-related issues, including human rights abuses, forced, bonded, and child labour, by enabling responsible sourcing of its suppliers.

Celestica expects all of its suppliers to comply with the U.S. Conflict Minerals Rules and provide all necessary declarations using the Responsible Minerals Initiative Conflict Minerals Reporting Template, which Celestica uses in conjunction with the Responsible Minerals Assurance Process (RMAP) to reasonably assure that the Tantalum, Tungsten, Tin or Gold in the products that Celestica manufactures do not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries (DRC Region). Celestica will assess future business with suppliers that are non-compliant with its Responsible Minerals Sourcing Policy.

Celestica annually produces a Conflict Minerals Report pursuant to Rule 13p-1 and Form SD promulgated under the Securities Exchange Act of 1934, as amended and publishes its Conflict Minerals Report on its website on the Compliance and Ethics page. Celestica's due diligence measures were designed to conform to the framework established in the Organization for Economic Cooperation and Development's (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016) and accompanying Supplements.



#### D. Risk Assessments

#### Risk Assessments

We conduct annual self-assessments at the corporate level and at the site-level at our manufacturing facilities using the RBA Facility Risk SAQ, which enables us to evaluate labour, environmental compliance, employee health and safety, ethics, and social responsibility in our operations and supply chain.

We conduct further reviews of our suppliers based on risk factors, such as location and commodity, to validate labour practices within the supply chain.

Every two years, we conduct peer or third party VAP audits at each of Celestica's manufacturing sites to ensure we manage a broad range of risks, including, but not limited to, risks of forced and child labour, human trafficking and modern slavery.

## Risk of Child and Forced Labour in Our Operations and Supply Chain

Based on the steps taken by Celestica in 2023 and as part of our business practices and policies, as described in this Statement, we consider the risk of forced and child labour within our operations to be negligible.

We are aware that there may be a risk of forced labour at all levels of our supply chain. Currently the processes in place within Celestica to determine the risk of forced or child labour within our supply chain is limited to suppliers that participate in the Annual Supplier RBA Compliance Program The prevalence of the risk increases for suppliers located further down the supply chain.

Celestica also has increased supply chain controls on an ad-hoc basis for suppliers subject to specific legislation, including requirements to provide specific documentation on a case by case basis.

## **Remediation Measures**

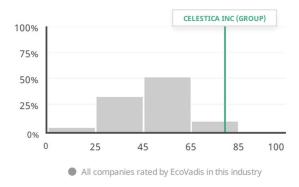
Where we have discovered the potential or confirmed presence of forced or child labour in our supply chain, we have taken the following steps:

- engaged with the supplier to investigate the need for remediation;
- where remediation was needed, we required that the supplier take action to eliminate the risk and take preventative measures to prevent further instances of forced and child labour; and
- where the supplier failed to implement corrective action to our satisfaction, we had the discretion to elect to terminate our relationship with such supplier.



## **Industry Participation, Co-operation and Engagement**

Celestica annually participates in an independent, third party assessment of our sustainability management systems conducted by EcoVadis, a sustainability ratings provider that works to improve the environmental and social practices of companies by leveraging the influence of global supply chains. At the end of its audit, EcoVadis provides a rating covering a broad range of non-financial management systems including Environmental, Labour & Human Rights, Ethics and Sustainable Procurement impacts. Celestica's score for its Labour and Human Rights practices for 2023 was 80/100 as shown below:



# E. Training and Assessing Effectiveness

## **Training**

Every employee that joins Celestica is trained on our Business Conduct Governance. 100% of our employees have completed BCG Policy training, and we conduct annual re-certifications. RBA training regarding forced and child labour, human trafficking and modern slavery is also made available to employees on Celestica's learning platform.

# **Assessing Effectiveness**

We continually monitor the effectiveness of the actions and policies described herein to address the risk of forced and child labour, human trafficking and modern slavery in our operations and supply chain. In addition, Celestica presently intends to continue to review and, where applicable, improve on existing practices.



## F. Approval Pursuant to the MSA and CTSCA

## **Approvals**

The Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and Section 1714.43 of the California Civil Code (the California Transparency in Supply Chains Act of 2010 and constitutes Celestica Group's forced labour, modern slavery and human trafficking statement for the financial year ending December 31, 2023. The Statement has been approved by the Board of Directors of Celestica Inc. (the "Board") with respect to the financial year ending on December 31, 2023 and is signed on behalf of the Board by Robert A. Mionis, Director, President and Chief Executive Officer of Celestica Inc.

Dated: April 24, 2024

Robert A. Mionis

Director, President and Chief Executive Officer of Celestica Inc.

# G. Approval and Attestation pursuant to the Act for the Canadian Reporting Entities Only

This Statement was made pursuant to sections 11(1) and 11(3) of the Act and was Approved by the Board of Directors of Celestica Inc., pursuant to section 11(4)(b)(ii) of the Act.

In respect of Celestica's Canadian Reporting Entities only and in my capacity as President and Chief Executive Officer of Celestica Inc., and not in my personal capacity, I make the following attestation in accordance with the requirements of the 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 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.

Dated: April 24, 2024

Robert A. Mionis, I have the authority to bind Celestica Inc. and Celestica International GP Inc. being the general partner of Celestica International LP

Director, President and Chief Executive Officer of Celestica Inc.

Director, Celestica International GP Inc. being the general partner of Celestica International LP