

## **HIROTEC AMERICA Modern Slavery Statement**

HIROTEC AMERICA, Inc. does not tolerate any forms of modern slavery including slavery, servitude, forced and compulsory labor, or human trafficking, all of which involve the deprivation of a person's liberty by another individual in order to exploit them for personal or commercial gain.

The Company is committed to acting ethically and with integrity in all business dealings and relationships, including implementing and enforcing effective systems to ensure modern slavery does not exist within the business environment.

### **Our Business**

HIROTEC AMERICA is global automotive industry leader specializing in the production/automation of body-in-white closures, exhaust systems, and closure manufacturing equipment. HIROTEC America is typically a Tier 1 Supplier to OEM customers HIROTEC AMERICA entity operates in Michigan, United States of America.

### **Our Policies**

We have implemented policies and procedures to ensure compliance with applicable laws and regulations regarding modern slavery and human trafficking. These policies include:

1. **Supplier Code of Conduct:** We require all 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. Our Supplier Code of Conduct can be found on our company's website at <https://www.hirotecamerica.com/SupplierCodeofConduct.html>
2. **Anti-Slavery Policy:** Our policy prohibits any form of slavery, servitude, forced or compulsory labor, or human trafficking within our organization.
3. **Whistleblower Protection Policy:** Our policy protects worker confidentiality and prohibits retaliation against workers who report workplace grievances. Should any individual of the Company need to raise concerns of illegal, dishonest, unethical, or otherwise improper activities, the Company shall uphold a policy of confidentiality, protection from retaliation, and anonymity to ensure employees are comfortable doing so. Any concerns of illegal, dishonest, unethical actions and/or violations including but not limited to violation of company policies, can be reported directly to HIROTEC AMERICA, Inc. through [grievancematters@hirotecamerica.com](mailto:grievancematters@hirotecamerica.com).
4. **Due Diligence Processes:** We conduct due diligence on our suppliers and will continue to assess and address the risk of modern slavery and human trafficking within our supply chain. HIROTEC AMERICA is making this a large focus in 2024.

### **Remediation of Income Loss**

HIROTEC AMERICA, Inc. is not aware of any instances of any of forced labor or child labor in either our own operations or those of our vendors, suppliers, or service providers and therefore have not taken any action.

**Reporting**

Employees are encouraged to report any concerns related to modern slavery or human trafficking through our whistleblowing mechanism ([grievancematters@hirotecamerica.com](mailto:grievancematters@hirotecamerica.com)). Reports will be investigated promptly and appropriate actions will be taken.

**Assessing Effectiveness**

HIROTEC America will regularly monitor and review our efforts to combat modern slavery and human trafficking, and we will continue to refine our assessment methods to enhance our understanding of the effectiveness of our actions.

**Attestation**

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 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 HIROTEC AMERICA, Inc.



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**Sharon Beetham**

Chief Financial Officer

May 31, 2024