



Hammond Manufacturing
394 Edinburgh Road North
Guelph, Ontario, Canada
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Forced Labour In Canadian Supply Chains Fiscal Report Year 2023

This statement is made pursuant to Canadian Bill S-211 and sets out the steps that Hammond Manufacturing and related subsidiaries have taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Hammond Manufacturing has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Hammond Manufacturing is a global supplier of enclosures to the electronic and electrical industries, power transformers, outlet strips, data cabinets, and accessories. Our operations include metal fabrication and painting, plastic injection moulding, outlet strips, aluminum extrusion cutting and packaging, production of electronic production. Hammond sources aluminum die castings from Taiwan and India. We source electronic transformers and 19" cabinet products from China. We have sources for enclosures and accessories in Italy and Germany.

Hammond Manufacturing operates manufacturing facilities and offices in the following locations:

Canada	394 Edinburgh Road North, Guelph, Ontario 55 Wilbert Drive, Guelph, Ontario 215 Minto Road, Palmerston, Ontario 485 Conestogo Road, Waterloo, Ontario 52 Rankin Drive, Waterloo, Ontario 505 Dutton Drive, Waterloo, Ontario 601 Colby Drive, Waterloo, Ontario 295 Frobisher Drive, Waterloo, Ontario 7 Nicolas Beaver Road, Aberfoyle, Ontario 525 Southgate Drive, Guelph, Ontario 985 Rue Bergar, Laval, Quebec	Metal fabrication, painting Metal fabrication, painting Metal fabrication, painting Plastic moulding Electronic transformers Outlet strips, extrusions CNC machining, printing Packaging, storage Warehousing, shipping Warehousing Sales office
USA	475 Cayuga Road, Cheektowaga, New York	Plastic moulding, sales office
UK	1 Onslow Close, Basingstoke, Hampshire	Warehousing, sales office
Australia	11-13 Port Road, Adelaide, South Australia	Sales office

Supply Chain – Finished Products. Main Vendors:

Electronic Transformers	Supplier 1	Dongguan, China
Electronic Transformers	Supplier 2	Dongguan, China
Electronic Transformers	Supplier 3	Dongguan, China
Electronic Transformers	Supplier 4	Taipei, Taiwan
19" Cabinets	Supplier 1	Ningbo, China
Plastic enclosures	Supplier 1	Shenzhen, China
Plastic enclosures	Supplier 2	Ningbo, China
Plastic and aluminum enclosures	Supplier 3	Taipei, Taiwan
Plastic and aluminum enclosures	Supplier 4	Rinteln, Germany
Plastic and aluminum enclosures	Supplier 5	Mumbai, India
Plastic enclosures	Supplier 6	Varese, Italy
Air Conditioner products, accessories	Supplier 1	Hamburg, Germany

(For competitive reasons the supplier names are not given)

Supply Chain – Raw Materials. Main Vendors:

Steel and aluminum	Concord Steel	Ontario, Canada
Steel and aluminum	Samuel Steel	Ontario, Canada
Powder paint	Protech	Quebec, Canada
Powder paint	Sherwin Williams	Ontario, Canada
Plastic pellets	PRL	NY / CT, USA
Plastic pellets	Sabic	OH / MI, USA
Aluminum extrusions	Supplier 1	Toronto, Canada
Aluminum extrusions	Supplier 2	Toronto, Canada
Aluminum extrusions	Supplier 3	Toronto, Canada
Transformer laminations	Tempel Steel	Burlington, Canada
Transformer bobbins	Foremost plastics	Illinois, USA

(Some names omitted for competitive reasons)

Hammond Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. In all regions where we operate our own facilities we comply with local laws regarding hours of work and wages.

4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
5. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Policy Towards Suppliers

Hammond Manufacturing operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and for most this includes on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. We operate on a principle of “Know Your Supplier” and rely on regular contact, including factory visits, to ensure that our supply chain meets our standards. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees any prevailing minimum wage applicable within their country of operations
4. We may terminate the contract at any time should any instances of modern slavery come to light

Our High Risk Areas

We have taken a special interest in suppliers in China and India. For Chinese suppliers the current focus is on any activities in the Xinjiang Uyghur Autonomous Region to ensure compliance not only with Bill S-211 but also the UK Modern Slavery act and US House Resolution 6256 which covers goods produced with forced labour. Our suppliers are typically in the Dongguan and Ningbo areas, and their supply chain is in the local area as well. Our due diligence has not shown any links to the Xinjiang area. Our on-site visits have not led to any suspicions of issues that would violate our Code of Conduct.

Training

We regularly conduct training for our procurement / buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This training is also part of our onboarding process for new staff in these roles. Training covers the Canadian, UK, and US legislation on this issue, along with best practices on the subject.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the company on March 4, 2024 to reflect our activities in 2023. As corporate officer and signing authority I have the authority to bind Hammond Manufacturing.

Name: Alex Stirling

Signature:

A handwritten signature in black ink, appearing to read 'A. Stirling', written over a horizontal line.

Title: Executive Vice President

Date: March 27, 2024