

# Modern Slavery Report for the Fiscal Year Ended December 31, 2023 Hubbell Canada ULC

*This Modern Slavery Report (the “Report”) addresses the period from January 1, 2023 to December 31, 2023 (“Fiscal 2023”) and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”). This Report is made on behalf of Hubbell Canada ULC (“Hubbell Canada”). References to “we”, “us” or “our” contained herein relate to Hubbell Canada or Hubbell Incorporated, as the applicable context requires.*

## 1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading manufacturing business, Hubbell Canada recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada by Hubbell Canada or of goods imported into Canada by Hubbell Canada.

## 2. Our Business

Hubbell Canada is a Canadian unlimited liability corporation incorporated in Nova Scotia pursuant to the Nova Scotia *Companies Act*. Hubbell Canada manufactures and assembles high quality electrical products in Canada from its locations in Ontario and Quebec and sells and distributes such products both inside and outside of Canada. We source raw material from within Canada and the United States, and import finished goods primarily from the United States, the United Kingdom, China, Mexico and India.

Hubbell Canada is a subsidiary of Hubbell Incorporated (“Hubbell”), a United States corporation founded in 1888. Hubbell and its divisions and subsidiaries (together, the “Hubbell Enterprise”) manufacture electrical and utility solutions, with more than 75 brands used around the world. Many of the finished goods that we import into Canada are sourced from various Hubbell manufacturers.

### 3. Our Policies

#### **Policies**

The obligation to respect, promote and protect fundamental human rights is ingrained in our culture and the way we conduct business. We are committed to eliminating the occurrence of human rights violations from our operations and supply chain. We strictly prohibit all forms of involuntary labor, child labor, bonded labor and human trafficking in our business dealings. Through our policies we communicate our values and expectations for ourselves, our suppliers, and our partners. Our relevant policies are discussed in further detail below:

#### **Code of Business Conduct and Ethics**

We are committed to conducting our business in a lawful and ethical manner. We are subject to Hubbell's Code of Business Conduct and Ethics (the "Code"), which is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Hubbell Canada employees should always act lawfully, ethically and in the best interests of Hubbell Canada. The Code expressly prohibits the use of child labor, bonded labor, involuntary servitude or forced labor in any of our global operations or facilities.

#### **Third Party Code of Conduct**

Hubbell also has a Third Party Code of Business Conduct and Ethics (the "Third Party Code") which details the minimum standards of ethical and responsible conduct required for our third parties, including suppliers, vendors, sales agents, distributors, subcontractors and any other third parties that work for or with us. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Third Party Code in their own operations and supply chain. Hubbell Canada requires, as part of a verification process before engaging potential suppliers, that all suppliers enter into a supply agreement or be bound by a purchase order that obligates the adoption of the Third Party Code and requires compliance by such suppliers with all applicable laws and regulations. Such applicable laws include, without limitation, prohibiting the use of forced labour, modern slavery, human trafficking and child labour.

The Third Party Code also sets forth our principles of inclusivity and accountability. We engage with suppliers that are committed to these same principles and suppliers commit to these standards as a condition of doing business with us.

Hubbell's assurance activities periodically include conducting in-person compliance audits of top spend suppliers for compliance with the Third Party Code and evaluation of potential quality, security, anti-corruption and human rights risks, including the use of forced labour, modern slavery, human trafficking and child labour. Hubbell also screens all of its sales agents and distributors for compliance risks, including the risk of using forced labour or child labour.

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We review the Third Party Code on a periodic basis to ensure that this policy is in line with current best practices.

### **Global Human Rights Policy**

Hubbell's Global Human Rights Policy and the Code, to which all entities in the Hubbell Enterprise are subject, set the expectations for our employment practices to safeguard the principles of freely chosen employment, non-discrimination, and the elimination of forced and underage labour.

Hubbell Canada also has a robust recruitment and onboarding process that adheres to all applicable labour laws and is committed to supporting the fundamental human rights of our employees.

### **Conflict Minerals Policy**

Hubbell Canada is also subject to Hubbell's Conflict Minerals Policy and related procedures (the "Conflict Minerals Policy"), which require Hubbell Canada's procurement teams and employees to carefully analyze the sourcing of certain minerals in our global supply chains originating from the Democratic Republic of Congo and adjoining jurisdictions to help ensure that we do not inadvertently fund armed groups which, among other things, may perpetrate modern slavery, human trafficking and other human rights abuses.

## 4. Assessing Our Risk

We consider all potential risks to the organization as part of annual enterprise risk management processes. As discussed in other sections of this Report, we have taken steps to assess and prevent the use of forced labour and child labour. Although we have identified parts of our activities and supply chains that carry a potential risk of the use of forced labour or child labour, and continue to strive to identify emerging risks, we have not identified any use of forced labour or child labour in our activities or supply chains. Accordingly, Hubbell Canada has not engaged in any remediation efforts concerning the use of forced labour or child labour.

## 5. Our Commitments

As previously noted, Hubbell Canada requires, as part of a verification process before engaging potential suppliers, that all suppliers enter into a supply agreement or be bound by a purchase order that obligates the adoption of the Code and requires compliance by such suppliers with all applicable laws and regulations. Such applicable laws include, without limitation, prohibiting the use of forced labour, modern slavery, human trafficking and child labour.

In the majority of its supply agreements, Hubbell Canada also reserves the right to commission independent audits of suppliers.

All employees of Hubbell Canada are required to comply with the Code and undertake an annual code of ethics training program. Among other things, the Code includes:

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- guidance and obligations on ethical decision making, including in relation to Hubbell Canada's procurement processes;
- arrangements for raising concerns about potential violations of the Code or Third Party Code, and speaking up to ensure that employees continue to promote the highest ethical standards in our business practices; and
- obligations and shared values in relation to protecting human rights.

Hubbell Canada recognizes the importance of promoting individual health and welfare, economic development and political stability and preventing crimes and human rights abuses such as modern forms of slavery and human trafficking. The Code puts such issues at the fore, with express commitments to avoiding child or forced labour in any of our global operations or facilities and not tolerating known instances of unacceptable treatment of workers or involuntary servitude.

As previously noted, Hubbell Canada is subject to the Conflict Minerals Policy and the Third Party Code. The Conflict Minerals Policy requires Hubbell Canada's procurement teams and employees to analyze the sourcing of certain minerals in our global supply chains originating from the Democratic Republic of Congo and adjoining jurisdictions to help ensure that we do not inadvertently fund armed groups which, among other things, may perpetrate modern slavery, human trafficking and other human rights abuses.

Hubbell Canada's procurement teams work with our suppliers to identify potential alternative sources where it is considered that such a risk may arise. Our due diligence measures related to conflict minerals have been designed to conform, in all material respects, with the framework in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

When Hubbell Canada enters into new contracts with suppliers, we also seek to include an obligation requiring suppliers to provide information about the source of Conflict Minerals and smelters.

The Third Party Code describes the minimum standards of ethical and responsible conduct required for our third parties.

Hubbell Canada's third parties include, without limitation, suppliers, vendors, sales agents, distributors, subcontractors and any other third parties that work for or with Hubbell Canada. All third parties are expected to inform and educate their employees, officers, directors, agents and subcontractors about this Third Party Code.

Any third party providing or receiving a service or product to or from Hubbell Canada is subject to this Third-Party Code. Failure to follow any of the provisions of this Third-Party Code can result in termination of any and all agreements with Hubbell Canada.

Employees of Hubbell Canada are also covered by grievance and whistleblowing procedures which facilitate the voicing of concerns that our staff may have regarding the ethical standards applicable to our supply chains. Employees and investors who suspect there may have been a breach of the Code or the Third-Party Code are encouraged to contact Hubbell's Speak Up Today hotline, a confidential reporting service managed by an independent third party 24 hours a day, 7 days a week, which is accessible for both employees and third parties via web or phone.

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## 6. Our Progress and Effectiveness

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through the Speak Up Today hotline and other informal mechanisms of employee feedback. As discussed above, we consider all potential risks to the organization as part of annual enterprise risk management processes.

## 7. Approval & Signature

This Report was approved by Hubbell Canada's Board of Directors on May 29, 2024 pursuant to paragraph 11(4)(a). This Report is also available on Hubbell Canada's website at <https://www.hubbell.com/hubbellcanada/en>.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Hubbell Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

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Katherine Anne Lane

*Director, Vice President and Secretary*

May 29, 2024

I have the authority to bind Hubbell Canada.