

Reporting entity's legal name: KIRCHHOFF Automotive Canada Inc.

Financial reporting year: 2023

Sector/industry: Manufacturing/Automotive

Location: 200 Vandorf Sideroad, Aurora, ON L4G 0A2 CANADA +1 905 727 8585

Mandatory information

Effective January 1, 2024, entities must, on or before May 31 of each year, submit a report to the Minister of Public Safety on:

- The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity

Within our published "Code of Conduct" for suppliers, we outline our human rights and labor practice requirements. 2. Respect for Human Rights The Suppliers must permanently respect and protect human rights, including the rights of minorities and Indigenous peoples, as well as women's rights. All forms of forced labor (including compulsory labor, debt bondage, and human trafficking), as well as all forms of modern slavery (including practices akin to slavery, serfdom, and servitude) or other forms of domination or oppression in the workplace (such as extreme economic or sexual exploitation and humiliation), must be prohibited by our Suppliers. The Suppliers must ensure that child labor is not tolerated within their operations and throughout their entire supply chain under any circumstances. The Convention No.182 of the International Labor Organization concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor of June 17, 1999 must be observed. Young workers do not work overtime or night shifts and are protected against hazardous conditions that harm their health, safety, morals, and development. Maintenance of adequate social working conditions is required. The Suppliers must respect the legally established minimum wages. Wages / remuneration must not be withheld. The Suppliers are required to comply with countries' applicable labor laws regarding working hours, overtime compensation, medical leave, government-mandated benefits, and respect binding laws related to leave entitlements. The Suppliers must respect employees' rights to associate freely, form, join in trade unions, bargain collectively, seek representation, and join workers' councils. Employees have to be allowed to communicate frankly with management without fear of reprisal, discrimination, harassment, or intimidation. Unlawful, forced evictions must be avoided. The Suppliers have to restrain themselves from any illegal deprivation of land, forests, and waters via the acquisition, development, or other use thereof. Hiring or use of private or public security forces to protect business projects must be avoided if, due to a lack of instruction or control on the part of the Supplier, there is a risk of violating human rights (such as torture and cruelty, inhumane or degrading treatment, damages to one's life or limb(s), or withholding the right to organize and freedom of association).

- Its structure, activities and supply chains

Kirchhoff Automotive is a global automotive parts manufacturing supplier. The family-owned company, which has existed since 1785, is part of today's KIRCHHOFF Group, which is made up of the Automotive, Ecotec, Mobility and WITTE Tools divisions. With more than 8,100 employees and 27 production plants in 11 countries, KIRCHHOFF Automotive represents the largest division in the group.

- Its policies and due diligence processes in relation to forced labor and child labor

Kirchhoff Automotive has a company policy and a vetting process with our supplier base that expressly prohibits child labor practices. Kirchhoff and its supplier base is required to adhere to standards. Kirchhoff Automotive has implemented an audit process for our supplier base to ensure that they comply with labor policies.

- The parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk

- Any measures taken to remediate any forced labor or child labor

Explained above and within the supplier code of conduct and audit process.

- Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains

Explained above and within the supplier code of conduct and audit process.

- The training provided to employees on forced labor and child labor

Upon employee onboarding, employees are trained on Kirchhoff's Code of Conduct which outlines the company's policy on human rights and labor.

Fair Working Conditions and Respect for One Another Discrimination, harassment and disrespectful behaviors at KIRCHHOFF Automotive are not tolerated. No one at KIRCHHOFF Automotive may be at a disadvantage, excluded, benefitted or preferred because of their race, ethnic background, gender, religion or ideology, handicap, age or sexual identity. Respect for Human Rights KIRCHHOFF Automotive prohibits the use of child or forced labor. Workers employed by KIRCHHOFF Automotive and its Suppliers, must be past the national legal age of compulsory schooling and statutory minimum

working age. KIRCHHOFF Automotive respects the legally established minimum-wages, the principle of "equal pay for equal work" and complies with countries' applicable labor laws regarding working hours and holidays. KIRCHHOFF Automotive respects Employees' freedom of association and the rights to representation. Employees are expected to respect human rights in their areas of responsibility and require the same level of respect from the Company's Suppliers and other Business Partners. Operational Safety and Health Protection The adherence to the relevant safety rules is evident at KIRCHHOFF Automotive. All Employees are required to know and comply with applicable safety rules and ensure that others comply as well. Employees are expected to set an example by strictly applying the safety rules themselves and ensuring that others do the same, remaining cautious of accidents and/or risks and promptly acting to ensure that potential hazards are addressed immediately

- How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains

Kirchhoff Automotive has an audit process "KASAR" with the purpose of auditing our supplier's labor practices to ensure compliance.

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Sumit Dutta
Vice President Procurement