# Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report

#### 1. Introduction

This Report is produced by Mueller Canada Ltd. ("Mueller" or the "Corporation" or "our" or "we") for the financial year ending September 30, 2023 (the "Reporting Period") and sets out the steps taken 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 or of goods imported into Canada by the Corporation. This Report constitutes the first report prepared by the Corporation pursuant to Canada's new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").

# 2. Steps to prevent and reduce risks of forced labor and child labor

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the highest importance on respecting human rights while conducting our business activities everywhere we operate. We expect the same from our business partners. We took the following steps during the Reporting Period to prevent and reduce the risk of forced labor or child labor in our business and supply chains:

- reviewed and updated our Supplier Code of Conduct;
- conducted a preliminary initial internal assessment of the risks of forced labor and/or child labor in our supply chains to enhance our supplier due diligence process; and
- updated our supplier due diligence, which includes modern slavery risks, with better auditing processes for new and existing suppliers.

Details of the above actions are set out in this Report.

# A. Structure, Activities and Supply Chains

Mueller Canada Ltd. is incorporated under the *Canada Business Corporation Act*. Headquartered in Ontario, Canada, with less than 200 employees. Mueller Canada is a subsidiary of Mueller Water Products, Inc. (NYSE: MWA), a leading manufacturer and marketer of products and services used in the transmission, distribution, and measurement of water in North America. Our broad product and service portfolio includes engineered valves, fire hydrants, pipe connection and repair products, metering products, leak detection, pipe condition assessment, pressure management products and software technology that provides critical water system data.

Water Management Solutions develops technologies and offers products and services under the Echologics® brand name that can non-invasively (i.e., without disrupting service or introducing a foreign object into the water system) detect underground leaks and assess the condition of water mains comprised of a variety of materials. We leverage our proprietary acoustic technology to offer leak detection and condition assessment surveys. We also offer fixed leak detection systems that allow customers to continuously monitor and detect leaks on water distribution and transmission mains. Water Management Solutions sells dry-barrel fire hydrants under the Mueller and the Canada Valve<sup>TM</sup> brand names in Canada. We believe Water Management Solutions' ability to offer noninvasive leak detection and pipe condition assessment services is a key competitive advantage.

Mueller's final products are manufactured in Canada and the United States. Operations conducted in those facilities vary from manufacturing and assembly of water infrastructure components and parts to

final assembly, finishing, painting, and testing activities. Water Management Solution products ordered by customers are delivered by the Corporation or its affiliated companies. Marketing for Mueller products are provided from Canada and the US. Sales of Mueller's products are made through various offices of the Corporation and its skilled and well-trained sales representatives in the field. Maintenance services are also available through service centers located in Canada.

Mueller's global supply chain consists of product suppliers for a variety of components such as electronics, cable, and connector assemblies, PCBA, acoustic sensors, plastics, metalwork, and hardware. Our suppliers and business partners are reputable and certified by the highest industry standards (ISO or similar). The materials, components, items, and systems required to manufacture leak detection devices, valves, and hydrant components are procured from suppliers around the world and vary from product to product. Most of these materials, components and systems are provided by suppliers with which Mueller has long-term contracts. Mueller currently does business with less than 10 suppliers for Mueller Canada and 79 for the Echologics brand. Suppliers are located in 7 countries.

# B. Policies, Governance and Due Diligence processes

# 1. Environmental, Social and Governance Initiatives

Mueller is committed to incorporating the fundamental principles of sustainability by lowering our environmental impact on the world around us and operating our business in a safe, inclusive, and ethical manner. Mueller sees the management of Environmental, Social and Governance ("ESG") risks and opportunities as an inherent part of Mueller's success as a business. Mueller has delegated an Audit Committee, Environmental, Health, & Safety Committee, and the Compensation & HR committee with oversight of sustainability and corporate social responsibility, including monitoring of the Corporation's ESG plan, practices, related policies, and disclosure with respect to same, as well as monitoring and ensuring compliance with the Corporation's Code of Ethics.

#### 2. Human Rights Statement

In furtherance of Mueller's commitment to upholding human rights through, our Human Rights Statement reiterates Mueller's position to not use child or forced labor. In support of this commitment, we expect all employees at all levels, as well as our business partners, to act accordingly. Our Human Rights Statement can be found on our website: Human Rights Policy (muellerwaterproducts.com)

## 3. Supplier Code of Conduct

Mueller actively engages its supply chain by the adherence of its suppliers to its Supplier Code of Conduct. We contractually require all suppliers to agree to our The Supplier Code of Conduct and Business Code of Ethics. We continually update The Supplier Code to detail our expectations of suppliers in respect of human rights, labor, legal compliance, health and safety, the environment, anti-corruption, ethics, and governance. The Supplier Code can be found here: <a href="MWA Supplier Code of Conduct\_08-2023.pdf">MWA Supplier Code of Conduct\_08-2023.pdf</a> (muellerwaterproducts.com).

#### 4. Code of Ethics

All directors and employees of Mueller Water Products, Inc. and its subsidiaries are expected to carefully read and adhere to our Code. We expect all our contractors, consultants, representatives, agents, and others working temporarily for or providing services to us to comply with this Code in connection with any work or services performed on our behalf. Our managers have a special responsibility to lead by example. Managers must instill a culture of integrity and ethical business practices and cannot ignore violations or potential violations of our Code. The Code details the standards of behavior expected from everyone to whom it applies in their daily activities and in dealings with others. As part of our Code, we explicitly condemn human rights abuses and do not condone the use of slave or forced labor, human trafficking, child labor, the degrading treatment of individuals, physical punishment, or unsafe working conditions. All employees are required to understand and obey local laws, to report any suspected violations, and to act in accordance with our Core Values and Code. We encourage questions, concerns, and reporting by providing a hotline number and an online reporting option available in a variety of languages.

The Code can be found here: Governance Documents – Mueller Water Products

### 5. Reporting and Non-Retaliation Policy

Without exception, we prohibit retaliation against anyone who reports a violation or suspected violation of our Code or any of our policies in good faith. In accordance with our Reporting and Non-Retaliation Policy and our Code, should employees or suppliers have concerns regarding forced or child labor, they have a responsibility to report their suspicions or concerns. Mueller provides multiple channels for reporting:

- Our Compliance Office or Chief Compliance Officer by phone or email
- Your local human resources representative or an attorney in our Legal Department; or
- The Mueller Helpline or third-party online reporting platform in a variety of languages and from anywhere in the world

#### 6. Assessing and managing our risk

Mueller requires all new suppliers be submitted through a vetting and approval process prior to onboarding. This includes physical visits to the supplier's place of business to complete audits and inspections, and maintaining a supplier compliance checklist that includes forced labor and child labor concerns. Mueller is currently implementing a risk-based approach to assess and manage the risk of forced labor and child labor. This approach will help us prioritize our efforts and adjust our actions. The approach will help identify risks in supply chain through a due diligence process based on country-of-origin risk indicators and the types of products supplied. The risk score will determine the level of additional due diligence to be performed with respect to forced and child labor, and how often we will review and monitor the supplier.

#### C. Forced Labor and Child Labor Risk

- a. Our Supplier Code specifically includes provisions prohibiting child labor and forced labor, as follows:
  - . Suppliers are expected to:
    - Promote equal opportunities for and treatment of its employees, irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex, age, pregnancy, ancestry, medical condition, marital status, gender identity or genetic information.

- Respect the personal dignity, privacy and rights of each individual.
- *Not force any person to work against his or her will.*
- Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual or personal harassment or unlawful discrimination.
- Prohibit behavior, including gestures, language or physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- Provide fair remuneration and guarantee the applicable national statutory minimum wage.
- Comply with the maximum number of working hours set forth by applicable laws.
- Recognize, to the extent legally permitted, the right of free association of employees, and not discriminate in favor of or against members of employee organizations or trade unions; and
- Prohibit human trafficking and the use of child, forced, or imprisoned labor and provide working conditions that are safe and fair.
- Allow Mueller to immediately perform onsite audits if violations are suspected

#### b. Our Code of Ethics specifically prohibits forced and child labor, as follows:

We condemn human rights abuses and do not condone the use of slave or forced labor, human trafficking, child labor, the degrading treatment of individuals, physical punishment, or unsafe working conditions. All employees are required to understand and obey local laws, to report any suspected violations, and to act in accordance with our Core Values and Code.

#### D. Remediation Measures

As reflected in our Supplier Code, Code of Ethics, Reporting and Non-Retaliation Policy, and our Human Rights Policy, Mueller offers multiple reporting mechanisms for our employees, suppliers, and anyone who does business with us to report violations, ask questions, or voice concerns. As stated in our Code of Ethics, we will promptly and thoroughly investigate any reports anywhere in the world and corrective action including termination of any supplier in violation in addition to implementing a plan to remedy the violation.

#### E. Remediation Loss of Income

Mueller has not identified any violations requiring remediation. Therefore, no vulnerable families have experienced loss of income as a result of steps Mueller has taken to eliminate forced labor or child labor risks.

#### F. Training

Mueller's employees receive annual training on ethical topics and our policies. All new employees are assigned a mandatory onboarding training package which includes training on our Code of Ethics. On an annual basis, all employees are required to certify their abidance by our Code of Ethics. Mueller intends to provide training to all employees that will include child and forced labor.

# G. Assessing effectiveness

Mueller intends to prioritize assessing its effectiveness in preventing and reducing risks of forced labor and child labor in its activities and supply chains in 2024.

#### H. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. 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.

I have the authority to bind Mueller Canada Ltd.

By: Sthat

Full name: Krutin Shah

Title: Vice President, Supply Chain

Date: