



# Report for Canada's Fighting Forced Labour & Child Labour in Supply Chains Act

## Scope of Report

This report applies to every wholly owned entity of Myers Emergency & Power Systems LLC and entities over which Myers Emergency & Power Systems LLC has control, including the reporting entities identified in the Organizational Structure paragraph below. This Report constitutes the first report prepared by Myers Emergency & Power Systems ("Myers EPS") pursuant to Canada's new Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Representatives from each entity covered by this report were consulted in developing the report, to ensure consistency in our policies and standards, due diligence programs, and approach to mitigating forced labour and child labour risks in our operations and supply chain.

This report is issued in compliance with the Fighting Forced Labour and Child Labour in Supply Chains Act and serves as our disclosure for the fiscal year ending Dec 31, 2023. The report outlines the steps we have taken to prevent, identify, and address forced labour and child labour risks across our business and supply chain.

## Organizational Structure

Myers Emergency & Power Systems, LLC (Myers EPS), a designer, and manufacturer of highly engineered emergency lighting backup power technology such as inverters, battery backup systems, control devices and other emergency power solutions. Myers EPS is headquartered out of Bethlehem, Pennsylvania with 154 employees. Myers EPS acquired the following companies:

Storage Power Solutions, Inc. (SPS) was acquired in January 2024 located in Ontario, Canada with 5 employees. SPS is a battery energy storage solutions company that designs, manufactures, and distributes lithium-iron-phosphate based battery energy storage. The acquisition of SPS enables Myers EPS to Launch its EnerShed product line, a smart energy storage solution that reduces customers' reliance on the energy grid, manage energy usage and pricing fluctuations, and ultimately decrease energy costs.

Emergency Lighting Equipment Service Company, Inc. (ELESCO) was acquired in May 2023. ELESCO specializes in providing comprehensive services related to emergency lighting systems. The main office is in Mesa, Arizona with a service center in Costa Mesa, CA and another service center is in Stockton, CA. ELESCO employs 18 employees.

Low Voltage Systems, LLC was acquired in November 2019, and is a manufacturer of commercial lighting solutions in the emergency lighting control and mini-inverter segment of the industry. Headquarters are in San Leandro, California with 9 employees.



## Supply Chain

Myers EPS purchases products such as raw materials, sub-assemblies, electrical components, and contract manufactured goods from domestic and international suppliers. We work with multiple direct suppliers having manufacturing facilities located in over 8 countries, encompassing suppliers of all sizes, from small manufacturers through to global multi-nationals. Our supply chain includes raw material suppliers, component manufacturers, and logistics providers. Our largest procurement categories in fiscal year 2023 were VRLA batteries and PCBA assemblies with the main country of supply being Vietnam.

## Policies and Due Diligence Processes

### Governance and Policy Framework

Myers EPS has adopted a series of core policies that communicate our position on forced labour and child labour and explicitly prohibit their use in our operations and supply chains and describe the steps we will take to prevent them.

All Myers EPS employees and joint venture employees over which we have management control are required to comply with our anti-discrimination, employment equity, respect in the workplace, workplace violence and harassment policies. These policies set clear expectations, define desired behavior for our employees, contractors, and any other person present at the workplace and help us monitor compliance with our standards. These policies are based on the requirements under Ontario employment law and included all Ontario standard and/or required employment-related policies.

Myers EPS is committed to respecting human rights throughout our supply chain. We give effect to this commitment in various ways, including through the conflict minerals program we have implemented for several years, through which we actively engage with our customers and suppliers on the use of conflict minerals. We have adopted a conflict minerals policy articulating the conflict minerals supply chain due diligence process and our commitments to reporting obligations regarding conflict minerals.

### Internal Responsibility

Our Board plays an essential role in guiding our approach to sustainability, including on issues related to the prevention of forced labor and child labor. We have established a cross-functional ESG Committee which is responsible for implementing our human rights commitments, including in relation to child labor and forced labor. This team has day-to-day responsibility for ESG issues such as climate impacts, responsible sourcing and human rights. This team ensures Myers EPS' expectations are communicated to employees and



suppliers. It is also responsible for ensuring that relevant staff who select and interact with suppliers, including procurement teams, contract managers and purchasing staff, receive training on how to identify, prevent and address risks of forced labor and child labor in the supply chain. The team briefs senior management about the results of all our due diligence efforts. In addition to the company's supply chain due-diligence efforts, internal controls are in place to ensure compliance with the 1986 Immigration Reform and Control Act which requires US employers to ensure that all candidates for employment are legally authorized to work in the country.

## Supplier Vetting

Prior to on-boarding, Myers EPS screens new suppliers to ensure they are in conformance to requirements regarding forced labour and child labour laws. Suppliers with manufacturing located in higher-risk countries or categories are subjected to greater scrutiny. We perform due diligence to ensure compliance with the Dodd-Frank Conflict Mineral reporting.

## Contractual Clauses

One of the key ways in which Myers EPS articulates expectations and controls the potential risk of forced labour and child labour in our supply chain is through our contracting process with our direct suppliers. We have incorporated specific provisions on human rights, including the prohibition of child labour and forced labour into procurement contracts and terms of conducting business.

## Grievance Mechanism

Myers Emergency & Power Systems LLC has established a grievance mechanism that enables any interested party (affected persons or whistle-blowers) to report concerns including on forced and child labor issues, without fear of retribution. Grievances can be filed with Human Resources by phone or email.

Our process helps ensure that complaints are swiftly received, risk-assessed, prioritized, investigated, and resolved while respecting the privacy of its workers as much as possible.

The Human Resources Department will determine who will conduct the investigation into the incident or complaint. If necessary due to the nature of the incident or the individuals involved (for example, in the case of a complaint involving executives, an external person qualified to conduct an impartial investigation will be retained to conduct the investigation.

## Forced Labour and Child Labour Risks

We recognize that in certain countries and certain industries, there is a greater risk of forced labour and child labour. The primary areas of our business and supply chains that carry a risk of forced or child labour include raw material sourcing and component manufacturing. As a leading designer and manufacturer of advanced backup power solutions, with operations in several countries, we recognize that we are exposed to the risk of forced labour in the mining and manufacturing sectors. In line with our risk-based approach, we have prioritized these areas of risk, ensuring that suppliers in these categories form the core of our risk assessment, and the actions we are currently taking to identify and address the risk of forced labour and child labour in our supply chain.

### Risk Assessment

We have recently partnered with Assent Inc, a third-party service provider, to assist us in reviewing our supply chain and identifying risks of forced labour and child labour. Working with Assent, we are in the process of conducting risk assessments which will give us visibility into where risks lie and also enable us to address them. This process utilizes a risk-based strategy that prioritizes the parts of our supply chain that pose elevated risks for forced labour and child labour. It consists of two key components, namely:

1. Direct Engagement with Suppliers

Utilizing a risk-based approach, as outlined above, we identified multiple suppliers for priority attention. These suppliers were selected for engagement based on the industries they operate in and the risk associated with their sourcing strategies to include countries of origin. Myers selects the suppliers for priority attention using a Spend/Commodity/Location screening method. The top 60% of suppliers by spend, plus suppliers providing “A” level commodities/products, and suppliers that manufacture in a higher risk location are included. We maintain long term supplier relationships where feasible with our average supplier relationship lasting 5 years or more. We are currently leveraging the industry-standard Slavery and Trafficking Risk Template (STRT) to collect information from these suppliers about their operational environments, policies, procedures, and practices, as well as the measures they have in place to detect, prevent, and address the risk of forced labour and child labour. The information will give us insight into risk factors such as the use of migrant or underaged workers, use of recruitment agencies, payment of recruitment fees and withholding of workers’ documents, all of which are indicators of forced labour and child labour. Additional information on the existence or otherwise of worker verification processes, forced labour and child labour risk control mechanisms, and due diligence processes for managing such risks in their operations and supply chains is also being collected. The assessment process is also enabling us to evaluate the policies and practices these suppliers have in place to address forced labour and child labour, as well as identifying whether they have adequate protective measures in place to support their workforce. The information derived from this



assessment enables us to take appropriate steps to address risks.

## 2. Ongoing Indirect Monitoring of Suppliers

In addition to the direct engagement with our suppliers we have also implemented a comprehensive monitoring solution that increases the visibility of our supply chain, helping us to quickly identify risks of forced labour and child labour among others. This monitoring solution tracks a wide variety of publicly available information, ranging from social media posts to NGO and academic reports, government sanctions lists, denied parties lists, adverse media and other reports that give us daily, ongoing insight into our supply chain and supports us in making informed decisions about working with certain suppliers or other third parties.

## Remediation Measures

As part of our due diligence, we have put mechanisms in place, through our third-party service provider to implement measures that help us address risks that may be identified. We will take action to remediate issues appropriately, depending on the type and severity of the risks or violations identified. This process is monitored, ensuring that we can keep track of progress and make decisions as to next steps for those suppliers who do not satisfactorily implement assigned actions. During the reporting year, we did not identify any actual cases of forced labour or child labour in our direct supply chain.

## Measures to Remediate Loss of Income

During the reporting year, we did not identify any actual cases of forced labour or child labour in our direct supply chain, and therefore we did not take any steps that led to loss of income to vulnerable families.

## Training and Capacity Building

With the recent additional support from our third-party partner Assent, Myers EPS plans to begin training to our employees regarding the importance of preventing forced and child labour.

These training courses from Assent will provide our employees with guidance on how to identify, prevent, and respond to potential forced labour and child labour. The training will be made available to employees who have direct responsibility for supply chain management.

## Assessing Effectiveness

While Myers EPS has put in place several measures to prevent and reduce the risk of forced labour or child labour in our activities and supply chains, as described above, we have not yet taken any actions to assess the effectiveness of those measures. We intend to assess their effectiveness at a later stage.



## Approval and Attestation

This report has been reviewed and approved by Myers Emergency & Power Systems, LLC., Chief Financial Officer, of Myers Emergency & Power Systems, LLC. and each of the reporting entities and signed by Myers Emergency & Power Systems, CFO.

In accordance with the requirements of the Act, and pursuant to section 11, sub-paragraph (4)(b) (ii) thereof, I attest that I have reviewed the information contained in the report for the entity or entities 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.

Signed,

A handwritten signature in black ink, appearing to read "Tom Donnelly", is written over a light blue horizontal line.

Tom Donnelly,  
Chief Financial Officer

Myers Emergency & Power Systems, LLC

May 31, 2024

I have the authority to bind Myers Emergency & Power Systems, LLC