



## **Fight Against Forced and Child Labour Code of Ethics**

### **1. INTRODUCTION**

This is a joint report encompassing the entities NASG Canada, Inc. and North American Stamping Group Holdings, LLC for the financial reporting year from January 1, 2023 to December 31, 2023 (The Reporting Period), and sets out the steps taken to prevent and reduce the risk that forced labour and child labour was used at any step in the production of goods in Canada or elsewhere or of goods imported into Canada. North American Stamping Group Holdings, LLC, and its controlled entity NASG Canada are the reporting entities for the purposes of the Act.

This report has been prepared and filed pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act).

### **2. STEPS TAKEN DURING THE REPORTING PERIOD TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR**

The following steps were taken to prevent and reduce the risk of forced labour and child labour for the reporting period.

- Reviewed our corporate code of conduct to incorporate elements in support of the Act and to expressly prohibit activities that could aid forced labour or child labour within our organization.
- Reviewed our supplier qualify manual to incorporate the prohibition of forced labor or child labour within our supply chain.
- Prepared communications to all associates of NASG to raise awareness of forced and child labour risks.
- Examined our supply base to identify risks associated with forced labour or child Labour.

### **3. STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS.**

North American Stamping Group Holdings, LLC (NASG) and its affiliates that include NASG Canada, Inc. are privately owned with headquarters in Portland, Tennessee. NASG Canada, Inc. operates in Woodstock Ontario Canada.

NASG is an automotive component manufacturer specializing in metal stampings and welded assemblies in Canada, United States, and Mexico.

Our supply chain consists of products used in the manufacture of automotive assemblies which includes steel, aluminum, fasteners, stamping and welding tooling and all types of



mechanical equipment directly and indirectly employed in the manufacturing process. Most of our supply chain is within the Canadian, United States, and Mexico corridor, but some equipment/tooling is manufactured overseas which are imported by NASG. Indirect supplies and services are typically locally sourced.

#### 4. POLICIES AND DUE DILIGENCE PROCESSES

##### Respect for Human Rights

We respect and support compliance with international human rights policies and laws, including, but not limited to, international conventions, the Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

##### Zero-Tolerance for Forced Labour

NASG Canada has a zero-tolerance policy toward all forms of forced labour, including bonded labour, slavery, and human trafficking within all operations and supply chains.

##### Child Labour and Young Workers

We will not employ individuals under the legal employment age at any of our facilities, and we will not support suppliers who employ individuals under the legal age requirement.

##### Fair Employment Practices and Worker Empowerment

NASG Canada will ensure that all recruitment efforts and employment practices are conducted fairly and ethically, while focusing on providing safe working conditions, fair wages, and opportunities for development. We will empower workers with knowledge of their rights and avenues for reporting any instances of forced labor or exploitation.

##### Monitoring and Remediation

Monitor and assess compliance with ethical standards and identify any instances of forced labour among NASG Canada suppliers.

##### Commitment to Continuous Improvement

NASG Canada is committed to continuously improving our policies, procedures, and training programs to ensure best practices while addressing emerging challenges.

#### 5. FORCED LABOR AND CHILD LABOUR RISKS.

NASG annually assesses risk of forced labour and child labour in our supply chain by identifying the type of goods and manufacturing countries for products purchased. The Research that NASG has done shows that the risk for the types of goods are low from the manufactured locations.



NASG will continue to monitor risk with research reported by notable agencies and assess accordingly if emerging threats affect our approved sourcing channels.

**6. REMEDIATION MEASURES – Loss of income to the most vulnerable families**

NASG did not identify and risk or occurrences of forced labour or child labour, and we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labor our child labour in our activities and supply chains. Therefore, no remediation measures were taken during the Reporting Period.

**7. TRAINING**

NASG is committed to enforcing our policies related to ethics, codes of conduct, and respect for human rights. NASG is taking steps to strengthen our policies to incorporate the risks of forced labor and child labour. All NASG associates receive training annually. NASG is researching opportunities to better communicate our policies.

**8. ASSESSING THE EFFECTIVENESS IN ENSURING THAT FOURCED LABOR AND CHILD LABOUR ARE NOT BEING USED IN ENTITIE’S BUSINESS AND SUPPLY CHAIN.**

NASG has not identified specific risks requiring remediation measures during the Reporting Period. NASG will continue to enforce our policies with due diligence internally with our associates as well as externally with our suppliers and customers. NASG will review at least annually our policies and procedures related to forced labor and child labour.

**9. APPROVAL AND ATTESTATION**

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

Date: May 30, 2024

NAME: \_\_\_\_\_  \_\_\_\_\_ Rick Marsh

Title: Vice President and Chief Financial Officer

I have authority to bind the corporation.

The Report was approved pursuant to Section 11(4)(b) by the North American Stamping Group Holdings, LLC directors on May 15, 2024.