

## **Forced Labour Report for Novatronics Inc. d/b/a Curtiss-Wright Sensors & Controls**

### **Introduction**

This report is made in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") by Novatronics Inc. t/a Curtiss-Wright Sensors & Controls, a corporation incorporated under the laws of Canada ("Novatronics", "we", or "our"). Novatronics' ultimate parent company is Curtiss-Wright Corporation, a Delaware corporation publicly traded on the New York Stock Exchange ("Curtiss-Wright") with its principal place of business in Davidson, North Carolina.

This report has been prepared for the calendar year ending December 31, 2023.

### **Section 1: Structure, Activities and Supply Chains**

Novatronics is a Canadian corporation based in Stratford, Ontario, Canada with a manufacturing facility in Nogales, Mexico. Curtiss-Wright is the ultimate parent company of Novatronics. We operate within the Sensors Division of the Curtiss-Wright Aerospace and Industrial segment. We conduct activities associated with engineering design, limited manufacturing, and sale of products from our Stratford, Ontario facility with support from centralized services provided from the Sensors Division. Our primary business is the design, manufacture, and sale of electro-mechanical actuators and sensors into the global commercial and military aerospace markets.

Our supply chain consists of hundreds of suppliers that supply a range of product from complex machining components, simple catalogue items, to manufacturing and processing services. These suppliers are largely based in the U.S. and Canada, however, we also buy from suppliers located globally. Our supply chain is managed centrally from the Sensors Division office in Gilbert, Arizona.

### **Section 2: Policies and Due Diligence Processes in relation to Forced Labour and Child Labour**

#### *Policies*

Novatronics commitment to prevent forced labour and child labour in its business and supply chains is underpinned by appropriate policies. Novatronics believes that ethical conduct goes beyond compliance and resides in a comprehensive governance culture. The policies and procedures of Curtiss-Wright apply to all of its global subsidiaries and affiliates. These include the: (i) Curtiss-Wright Code of Conduct, (ii) Curtiss-Wright Human Trafficking and Slavery Policy, (iii) Curtiss-Wright Anti-Slavery and Human Trafficking Statement 2020, and (iv) Curtiss-Wright Code of Conduct – Suppliers and Customers. These policies can be found on the Curtiss-Wright's internet site at: <https://www.curtisswright.com/investor-relations/governance/governance-documents>.

Novatronics recognizes the fundamental importance of human dignity and is committed to protecting human rights through its operations and relationships. This commitment is anchored by both the Curtiss-Wright Human Trafficking and Slavery Policy and the Curtiss-Wright Anti-Slavery and Human Trafficking Statement 2020, which prohibit the use of all forms of forced labour and child labour by Novatronics as well as its suppliers.

The Curtiss-Wright Code of Conduct, which applies to all employees, directors, and officers of Novatronics, codifies the expectation that such persons be good corporate citizens and comply with all applicable laws and regulations, including specifically the prohibition on employing forced labour and child labour.

The Curtiss-Wright Code of Conduct – Suppliers and Customers, extends the principles of the Code of Conduct and Human Trafficking and Slavery policy to our suppliers and customers. It requires our suppliers and customers to comply with all applicable laws and regulations, including specifically the prohibition on employing forced labour and child labour.

### *Due Diligence*

Novatronics takes steps to evaluate the risks of slavery and human trafficking in its supply chain. This may include, where appropriate, audits of our suppliers and potential suppliers to evaluate our suppliers' ability to adhere to our Supplier Code of Conduct. Any failures to meet our requirements or concerns are addressed on a case-by-case basis.

### **Section 3: Risks of Forced Labour or Child Labour in Our Operations and Supply Chains and Steps Taken to Assess and Manage That Risk**

Novatronics supply chain is largely based in Canada and the United States and their businesses and operations are subject to a common set of laws and regulations applicable to our business. Given the commercial and military aerospace industry that we operate in, our products require a high degree of technical manufacturing expertise and quality and operational control both in our facilities and in our supply chains. As such, our suppliers are required to comply with and be audited against quality and operational requirements, such as AS9100, ISO9001, or similar quality and operational management systems. Our requirements for traceability and quality assurance require the use of suppliers that are able to trace their supply chain back to original manufacturers. Due to the highly technical nature of our products and how these requirements are incorporated into our supply chain, the result is a low exposure to the risks associated with forced labour or child labour.

In addition to the requirements described above regarding Curtiss-Wright's Code of Conduct and Curtiss-Wright's Code of Conduct – Suppliers and Customers, a clause found in Novatronics terms and conditions of purchase requires suppliers to certify that the production of materials incorporated into any products sold or otherwise provided to Novatronics complies with laws regarding slavery and human trafficking of the states, provinces or countries in which the supplier does business. We preserve the contractual and legal right to take warranted action, up to and including termination of the contractual relationship, against any supplier that acts in violation of this undertaking.

Before entering into any contractual relationship with a supplier, Novatronics conducts supplier due diligence, which includes searching publicly available databases to ascertain supplier's compliance with applicable laws and regulations and may include, where appropriate, a visit to the supplier's premises.

### **Sections 4 and 5: Actions taken to Remediate Forced Labour or Child Labour and Impact to Vulnerable Families**

As Novatronics has not identified any forced labour or child labour in its business or supply chain, it has not had to take any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.

Curtiss-Wright's Code of Conduct and Curtiss-Wright Code of Conduct – Suppliers and Customers provides a robust reporting mechanism for employees and suppliers/customers to address ethical or legal violations, as well as other concerns. The Curtiss-Wright hotline is a global, multi-lingual, toll-free

telephone and web-based system through which employees and suppliers/customers may report concerns confidentially and anonymously and is available 24 hours a day, seven days a week.

To protect whistleblowers, the Curtiss-Wright Code of Conduct prohibits retaliation against any person for reporting, in good faith, contraventions of the policy, or for filing a complaint.

**Section 6: Training**

In order to enhance understanding of and compliance with the Curtiss-Wright Code of Conduct, all employees of Novatronics are required to complete a training program annually which details ethical business practices, an inclusive workforce, and respectful treatment of our employees, and certify to their commitment to act in compliance with the Code of Conduct. Curtiss-Wright also requires all employees to complete annual training programs covering such topics as data privacy management, anti-bribery/trade compliance (including the Foreign Corrupt Practices Act and the UK Bribery Act), fraud, harassment, Foreign Corrupt Practices Act (FCPA), and cybersecurity. While the Code of Conduct training does not directly address issues of forced labour and child labour, it affirms our commitment to ensuring everyone working on behalf of Novatronics adheres to compliance with all applicable laws and regulations and the highest ethical standards.

**Section 7: Assessing Effectiveness**

To date, no actions have been taken to assess the effectiveness of measures in place to mitigate the risks of forced labour and child labour in its business and supply chain.

**Approval and Attestation**

This report was approved by the Board of Directors of Novatronics.

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 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.

I have the authority to bind Novatronics Inc.

Signature:

Name: Michael Whitehouse



Title: Senior Director of Operations

Date: May 28, 2024