

2023 Modern Slavery Report

1. Introduction

This joint report is produced by Previaan Holding Inc., a corporation governed by the *Business Corporations Act* (Québec) and its subsidiaries Previaan Technologies Inc. (“**Previan**”), Eddyfi Canada Inc. (“**Eddyfi Technologies**”), NDT Global Corporate Limited (“**NDT Global**”) and Zetec, Inc. (“**Zetec**”) (collectively, the “**Reporting Entities**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”). This report outlines the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Reporting Entities, pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

2. Previaan’s Business and Structure

All Reporting Entities are part of the Previaan Group, a fast-growing and highly innovative privately held industrial technology group providing advanced diagnostic technologies to ensure the health of infrastructure and critical assets. Built on a core foundation of ground-breaking Non-Destructive Testing (NDT) technologies, Previaan has expanded into a much broader range of cutting-edge inspection and monitoring technologies, as well as advanced data analytics software and services. The Previaan Group employs about 1,700 people throughout 28 offices worldwide and serves clients in more than 110 countries.

The Reporting Entities’ business segments include the following:

- Diagnostic and Remote Monitoring Technologies (DRMT), which consists of designing, producing and distributing advanced phased array ultrasonic testing, eddy current array, and other ultrasonic and electromagnetic equipment including instruments, sensors, software and robotic solutions to key industries such as aerospace, energy, mining, power generation, and transportation.
- Technologies as a Services (TaaS), which consists of providing ultra-high-tech diagnostic inspection solutions, advanced data analysis and integrity assessment services for ensuring the safety and longevity of energy sector infrastructure assets.
- Corporate, which consists of Previaan’s corporate activities supporting all entities of the Previaan Group.

3. Reporting Entities’ Supply Chains

Previan is headquartered in Québec, Canada and the manufacturing facilities of the Reporting Entities are located in Canada (Québec), Germany (Stutensee) and the United States (Snoqualmie, Washington). The supply chains across the Reporting Entities are similar, with their suppliers mainly providing mechanical and electronic parts and components and tooling equipment required to build the group’s inspection instruments. The majority of the Reporting Entities’ suppliers are located in Canada, the United States, the United Kingdom, and Germany.

4. Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

Previan advocates respect for the principles of the Universal Declaration of Human Rights (UDHR) and the core conventions of the International Labour Organization (ILO). It formalizes this commitment in its internal *Code of Conduct & Ethics* and publicly available [Supplier Code of Conduct & Ethics](#), which were both updated during the Reporting Period. The Reporting Entities are guided by Previaan's global policies, best practices, and procedures which apply to the whole group; however, they are afforded the entrepreneurial latitude to operate as autonomous platforms and to also put in place policies and procedures specific to their context.

All Reporting Entities aim to prevent and reduce the risk that forced labour or child labour is used in their business activities and supply chains. The Reporting Entities' *Terms and Conditions of Purchase* embed Previaan's *Supplier Code of Conduct & Ethics* or include a standalone clause on anti-human trafficking and slavery.

5. Policies and Due Diligence Processes

All Reporting Entities have policies in place that embed the human rights considerations into business conduct. Previaan's Board of Directors has oversight and responsibility for the group's Environmental, Social, and Governance (ESG) strategy, policies and practices, as well as for interpreting the *Code of Conduct & Ethics* and investigating any potential breaches.

5.1 Code of Conduct & Ethics

Previan's internal *Code of Conduct & Ethics* (the "**Code**") applies to Previaan, all its direct and indirect subsidiaries, and all its employees and consultants, who are bound by it. The Code was last updated in November 2023 and includes legal and ethical principles to which employees and consultants are expected to adhere, including a commitment to complying with freedom of association, collective bargaining and immigration laws, as well as laws prohibiting forced labour and child labour. Breaches or alleged breaches of the Code are investigated and may result in disciplinary action, up to and including termination of employment or business relationship, and may lead to civil, criminal or penal proceedings. For regulatory purposes, Zetec has adopted its own *Code of Conduct & Ethics*, which is based on the same principles as Previaan's and also includes a statement on anti-human trafficking and modern-day slavery. Likewise, its *Employee Handbook* contains a zero-tolerance statement on any form of human trafficking by its employees, agents or subcontractors.

5.2 Supplier Code of Conduct & Ethics

Previan's [Supplier Code of Conduct & Ethics](#) (the "**Supplier Code**") defines expectations regarding suppliers, consultants, subcontractors, service providers, agents and distributors (together, "**Suppliers**") for Previaan and all its direct and indirect subsidiaries.

The Supplier Code, last updated in May 2023, requires Suppliers to respect the principles of the Universal Declaration of Human Rights (UDHR) and the core conventions of the International Labour Organization (ILO). It further requires that Suppliers commit to complying with labour standards, freedom of association, collective bargaining and immigration laws, as well as laws prohibiting human trafficking, modern slavery, forced labour and child and underage labour.

NDT Global and Eddyfi Technologies' *Terms and Conditions of Purchase* requires the supplier to comply with the Previaan *Supplier Code of Conduct & Ethics*. Zetec's *Purchase Order Terms and Conditions* were updated in May 2023 and include a 'Human Trafficking and Slavery' clause requiring the seller to ensure that no items are manufactured or

handled by indentured, slave, or prison labor or by children under the age of 14 (or such older age as applicable in any jurisdiction). The seller is expected also to comply with Zetec's *Policy against Human Trafficking and Slavery*.

5.3 Policy Against Human Trafficking and Slavery

Zetec's *Policy Against Human Trafficking and Slavery* defines how it makes efforts to eradicate human trafficking, forced labour and unlawful child labour from its organization and its supply chains. The policy covers all employees of Zetec and all its suppliers, subcontractors or business partners.

5.4 Due Diligence Processes

During the Reporting Period, the Reporting Entities did not have a formal due diligence process related to forced or child labour in place. Previa intends to first conduct a risk identification assessment related to forced and child labour, after which it can determine the appropriate due diligence process in response.

Actual or suspected violations of the Code or Supplier Code can be reported, anonymously and confidentially, through the Previa Alert Platform accessible toll-free by telephone at (800) 461-9330 or via the [website](#). This platform is available 24 hours a day, 7 days a week and is operated by Convercent, an independent entity. Previa undertakes not to retaliate against any person who, in good faith, reports a violation.

6. Assessing and Managing Risk of Forced and Child Labour

The Reporting Entities did not have a formal risk identification mechanism in place during the Reporting Period to assess the risk of forced labour and child labour in their supply chains, but this has been noted as an area of improvement.

7. Remediation Measures and Remediation of Loss of Income

During the Reporting Period, the Reporting Entities did not identify any specific instances of forced labour or child labour or a situation where families could have experienced any loss of income as a result of steps taken to address forced labour or child labour. As such, no remediation measures have been undertaken.

8. Training

The Reporting Entities do not currently provide training to employees specifically on forced or child labour topics. All employees of the Reporting Entities have an obligation to read and acknowledge Previa's *Code of Conduct & Ethics* upon joining Previa or one of its subsidiaries and on an annual basis thereafter. Employees are asked questions related to the Code's content before signing their acknowledgement to confirm their understanding of the Code. All Reporting Entities' employees also have access to an online course catalog which includes training on ethical topics.

Zetec's employees are also required to review and sign its *Code of Conduct & Ethics* each year. Its employees are also required to sign a statement of understanding of the *Employee Handbook*, which includes a statement of zero tolerance for human trafficking.

9. Assessing Effectiveness

As there was no formal due diligence process related to forced or child labour in place during the Reporting Period, the Reporting Entities could not assess its effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains.

10. Approval and Attestation

This report was approved by the Board of Directors of Previa Holding Inc. pursuant to subparagraph 11(4)(b)(ii) 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 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 year listed above.

I have the authority to bind Previa Holding Inc.

Per:  _____

Martin Thériault
CEO and Chairman
May 15, 2024