

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR

2023 Report

Introduction:

This report is made pursuant to subsection 11(1) and 11(3) of the Bill S-211, to enact the fighting against forced labor and child labor in the business and supply chain. The report is prepared for RB&W Corporation of Canada, as required by the Act, it summarizes the steps that the entity has taken in the financial year ended December 31, 2023, to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada by RB&W or of goods imported into Canada by RB&W. The terms “we,” “our,” “us,” “Company,” and “RB&W” as used in this document refer collectively to RB&W Corporation of Canada.

RB&W has policies and processes in place to prevent and reduce the risks of forced labour and child labour in our operations and supply chains, outlined in more detail further in this report. These policies and processes apply company-wide and support our commitment to upholding human rights. We have a zero-tolerance policy for human rights abuses, which extends to the use of forced labour and child labour in our supply chain and that is discussed in the report in detail.

A: ORGANIZATIONAL STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

RB&W Corporation is a limited liability corporation registered in Canada, owned by a US based publicly listed company called Park Ohio Holdings Corporation. RB&W with its head office in Brampton Ontario, is a leader in cold-forming technology and is one of the largest suppliers of cold-formed parts in the U.S. RB&W Corporation’s industrial products and engineering expertise have provided a variety of industries worldwide with innovative and effective manufacturing solutions. The company has served the needs of the transportation industry since its embryonic stage. RB&W Corporation cold-formed and manufactured fastener products are found on millions of cars and trucks in hundreds of critical applications. It continues to grow as an important source for customers in the automotive and automotive aftermarket industries.

RB&W is a manufacturer of fasteners and fixings, such as nuts, bolts, washers, and spacers. Our global network includes suppliers of raw materials, component parts, finished goods, and services. Our suppliers are primarily located in North America, with significant partnerships in Taiwan as well. A significant portion of our purchases comes from large, well-known suppliers who are also required to comply with reporting obligations under relevant Acts. We prioritize establishing relationships based on trust and integrity with our suppliers, ensuring mutual benefits. Our supplier selection and onboarding process involves thorough due diligence, focusing on the supplier’s reputation and their adherence to health, safety, and environmental standards.

To mitigate forced / child labor risks and uphold our commitment to ethical practices, RB&W ensures that all suppliers are subject to rigorous due diligence. This process includes evaluating the supplier’s reputation and their compliance with health, safety, and environmental standards. Our goal is to establish relationships with our suppliers based on trust and integrity, benefiting both parties while adhering to strict compliance protocols.



B: POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Park-Ohio Holdings Corp. (“the Company” or “Park-Ohio”) strictly prohibits its employees, contractors and agents from engaging in any form of human trafficking, slavery or illegal child labor. Modern slavery can take various forms to include slavery, servitude, forced and compulsory labor, and human trafficking. This policy specifically prohibits, but is not limited to, the following conduct:

1. Engaging in the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjecting that person to involuntary servitude, peonage, debt bondage or slavery.
2. Engaging in sex trafficking, which means the recruitment, harboring, transportation, provision or obtaining of a person for the purpose of a commercial sex act, where the sex act is induced by force, fraud or coercion or involves a person under 18 years of age.
3. Procuring commercial sex acts.
4. Using forced labor.
5. Destroying, concealing, confiscating or otherwise denying access by an employee to the employee’s identity or immigration documents such as passports or drivers’ licenses.
6. Using misleading or fraudulent methods in recruiting or offering employment to persons, including making material misrepresentations regarding wages, benefits, location of the work, living conditions, housing and associated costs (if provided by the Company or its agents), any costs to be charged to the employee and hazardous nature of the work.
7. Using recruiters that do not comply with local labor laws of the country in which the recruiting occurs.
8. Charging employees recruitment fees.
9. Failing to provide return transportation or to pay the cost of return transportation for (a) an employee who is not a national of the country in which the work is performed and who was brought into that country to perform the work, or (b) for an employee who is not a U.S. national and who was brought into the U.S. to work on the contract or subcontract where the payment of such costs is required under a temporary worker program or an agreement with the employee. Payment of return travel costs is not required where the employee is legally permitted to remain in the country of employment and chooses to do so following the completion of work.
10. Providing or arranging housing that fails to meet the host country’s housing and safety standards.



11. Where required by law, failing to provide an employment agreement to the employee. Such agreement must be in the language the employee understands and describe all pertinent details of the employment.

Park-Ohio Holdings also has zero tolerance for illegal child labor by its subsidiaries, employees, contractors or agents. Employees, contractors or agents of the Company who violate one or more of these prohibitions will be subject to disciplinary action up to and including termination of employment, contract or agency. Any Company employee, contractor or agent who becomes aware of any such violation shall report it immediately to the Company's Human Resources Department, its Office of the General Counsel or Convercent.

C: RISK ASSESSMENT AND MANAGEMENT STRATEGIES

A major risk of potential involvement in forced or child labor within our business is associated with overseas supply chain. However, the chances that our company directly engages in such practices are exceedingly minimal.

To reduce the risk within our supply chain, we have obtained commitments from our supplier confirming that they do not employ forced or child labor in their production operations.

RB&W strictly prohibits the use of forced labor in any form, including but not limited to slavery, human trafficking, and involuntary prison labor. We uphold the principle that all employment must be voluntary, and workers must have the freedom to leave their employment at any time without penalty or coercion.

RB&W prohibits the employment of any individual under the legal minimum age for work as defined by applicable laws and regulations or under the age of 15, whichever is higher. We are committed to ensuring no child labor is used in any stage of our operations or supply chain. Furthermore, we recognize the importance of young workers aged 15 to 18 by providing appropriate working conditions and adhering to relevant labor standards.

D: MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

RB&W conducts due diligence to identify and assess the risks of forced labor and child labor within our operations and supply chain. This includes evaluating suppliers and subcontractors to ensure compliance with our policies and applicable laws. Suppliers will be required to certify that they do not engage in forced labor or child labor and to provide evidence upon request.

If forced labor or child labor is identified within our operations or supply chain, RB&W takes immediate corrective action, including but not limited to terminating relationships with non-compliant suppliers, and reporting violations to relevant authorities. All employees are encouraged to report any concerns related to forced labor or child labor without fear of retaliation.

RB&W has not identified any instances of forced or child labour in its activities and supply chains within the financial year ended December 31, 2023, and therefore, no remediation measures have been taken.

E: MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME

Should we uncover instances of forced or child labor directly associated with our business activities within our supply chain, and if the eradication of such labor might impose financial hardships on the families involved, we commit to responding with integrity. We will engage collaboratively with both the impacted parties and regulatory bodies to determine fair compensation and to provide necessary support to these families.

RB&W has not identified any instances of forced or child labour in its activities and supply chains within the financial year ended December 31, 2023, and therefore, no cases report where there was a loss of income to the effected labor or their family members. Hence no measures taken to remediate the loss of income.

F: TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

RB&W demonstrates its commitment to the fight against forced labour and child labour by ensuring all employees are trained, educated, and understand the importance and their role in the organization as it relates to the policy. New employees are trained during the onboarding process and refresher training is provided to all employees.

G: ASSESSING EFFECTIVENESS

RB&W monitors compliance with the policy through supplier assessments and vendor surveys. Compliance with this policy and the progress will be reviewed by the senior management team on an annual basis.

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. 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.



Dennis Bolden
Chief Financial Officer

May 17, 2024

Contact us:

If you have any inquiries concerning the 2024 fighting against forced labour and child labour in supply chains and operations report, please contact Dennis Bolden, Chief Financial Officer:

RB&W Corporation of Canada
10 Sun Pac Boulevard
Brampton, On L6S 4R5

Telephone: (905) 595-9725
Email: dbolden@rbwmfg.com
Website URL: <https://www.rbwmfg.com/>