

Modern Slavery Act Report

Renold Canada Ltd. (“**Renold Canada**”, business number 104476130 RC) is pleased to present its report (the “**Report**”) pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for its financial reporting year ended March 31, 2024. This Report also references Renold plc (“Renold Parent”, and together with Renold Canada “Renold”), where appropriate.

Renold is committed to ensuring that its business activities and supply chains do not undertake any activity which contravenes the Act. This goal is managed on an ongoing basis by ensuring that our practices to combat child and forced labour (also known as “modern slavery”) and human trafficking are robust, current and aligned with our values.

Our values reflect our commitment to acting ethically and with integrity in all our business relationships, activities and supply chains. This includes a commitment to implement and enforce effective systems and controls to ensure modern slavery and human trafficking does not take place anywhere in our activities and supply chains. More information about Renold’s values can be found on our website: <https://www.renoldcanada.com/company/corporate-social-responsibility/our-values/>.

Structure, Activities and Supply Chains

Renold operates in the wholesale trade industry and is a global leader in the manufacture of industrial chains. Renold also manufactures a range of torque transmission products, which are sold throughout the world to a broad range of original equipment manufacturers and distributors. We have a well-deserved reputation for quality that is recognized worldwide. Our products are used in a wide variety of industries including manufacturing, transportation, energy, steel and mining.

Renold Parent is listed on the Alternative Investment Market (AIM: RNO) and is the parent company of Renold Canada. Renold Parent and its subsidiaries (collectively, the “**Renold Group**”) released a Slavery and Human-Trafficking Statement for 2023 pursuant to the United Kingdom's *Modern Slavery Act 2015* (the “**UK Act**”). Renold Canada’s head office is located in Quebec, Canada, and Renold Parent’s head office is located in the United Kingdom.

Renold Canada sells goods inside Canada, and Renold Parent controls Renold Canada, an entity selling goods inside Canada. Renold Canada, on the basis of being a controlled entity, meets the definition of “entity” under the Act. Renold Canada has a place of business, does business and has assets in Canada and, as a controlled entity of Renold Parent, meets the size-related conditions for its two most recent financial years: it has at least \$20 million in assets, has at least \$40 million in revenue and employs an average of at least 250 employees.

Renold has taken the following steps to prevent and reduce the risk of forced and child labour in its activities and supply chains:

- ***Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chain:*** Renold undertakes an annual review of our supply chain, focusing on large suppliers and those in high risk areas and activities, per the Transparency International Index.
- ***Developing and implementing anti-forced labour and/or -child labour contractual clauses:*** Given our zero tolerance policy to modern slavery and human trafficking (see *Policies and Due Diligence Processes* for further details), Renold specifically incorporates contractual clauses preventing the use of modern slavery in its supplier agreements.
- ***Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists:*** Renold’s basic principles of conduct require its companies and employees to comply with all laws relating to human slavery and human trafficking.

Policies and Due Diligence Processes

Renold is committed to a zero tolerance policy of modern slavery and human trafficking throughout its activities and supply chains. We pride ourselves on creating work environments that are safe, enjoyable, productive and encouraging of full engagement and participation.

Anti-Slavery and Human Trafficking Policy

Renold Parent has adopted an Anti-Slavery and Human Trafficking Policy (the “**Anti-Slavery Policy**”), which sets out the basic principles of conduct for employees and suppliers doing business with the Renold Group. Each Renold supplier is aware of the Anti-Slavery Policy, and it requires suppliers to comply with all laws relating to modern slavery and human trafficking, as well as requiring such adherence from suppliers up their supply chains.

Due Diligence Processes

Since the coming into force of the UK Act, Renold Parent has required suppliers to enter into its Supply Chain Compliance Programme (the “**Programme**”). This annual review focuses on large suppliers and those in high risk areas or high risk activities and involves identifying and assessing potential risk areas in the supply chain; mitigating the risk of slavery and human trafficking; and monitoring potential risk areas in the supply chain. The Programme is subject to audit by Renold’s compliance structure.

Renold has also implemented an annual review of its supply chain, focusing on the largest suppliers, those in high risk areas (as identified by the Transparency International Index) and those participating in high risk activities. This program involves: identifying and assessing potential related risk areas in our supply chains; mitigating the risk of modern slavery and human trafficking occurring in our supply chains; and monitoring potential risk areas in our supply chains.

Moreover, we endeavour to ensure that all our standard terms of purchase, supplier contracts and contracts with distributors of Renold products contain contractual clauses which acknowledge our zero tolerance approach to modern slavery and human trafficking and adhere to compliance with all applicable legislation.

In addition, Renold will not do business with any entity associated with or known to be involved in any form of modern slavery.

Reporting

Renold operates a confidential, third-party administered whistle-blower hotline, whereby any person, employee or supplier can raise issues relating to unethical behaviour, including child and forced labour, in confidence. Concerns raised through the hotline are subject to immediate investigation. The hotline is widely publicized on each member of the Renold Groups' respective websites with the corresponding toll-free number for each jurisdiction. Through this process, employees are able to relay information to senior leadership about any concerns with full anonymity. The number of reports, the nature of the reports and the business response is regularly reviewed at the senior management and Board levels.

Values and Behaviours

Renold's Values and Behaviours Statement ("**Values and Behaviours Statement**") serves as a standard to which we hold ourselves and our employees.

Forced Labour and Child Labour Risks

At the end of 2023, each member of the Renold Group completed an annual due diligence review of their key supply chains and, having reviewed the same, Renold Parent assessed that all entities of the Renold Group are at a low risk of modern slavery, forced labour, child labour and human trafficking. Our assessment is based on several factors, including:

- whether the supplier has any prosecutions for the violation of any relevant legislation;
- whether the supplier has its own policy in relation to anti-slavery and human trafficking; and
- whether the nature of the goods and services are not of the type recognized as commonly produced by forced or child labour.

Nevertheless, Renold is committed to remaining vigilant and continually improving the transparency of its supply chains to minimize such risk.

Renold is committed to ensuring that our business and business partners do not undertake any activity which contravenes the Act and the UK Act. As at the date of this report, Renold has not been notified in writing of any incident of modern slavery or human trafficking.

Remediation Measures

Renold has not identified any instances of forced or child labour in its activities and suppliers involved in Renold's due diligence review. Therefore, we have not undertaken any remediation measures.

Remediation of Loss of Income

Renold has not identified any loss of income to the most vulnerable families resulting from any measure taken to eliminate the use of child or forced labour. Therefore, we have not undertaken steps to remediate any loss of income.

Training

Renold personnel are trained to use our due diligence questionnaire, and we are also contemplating further training.

Assessing Effectiveness


The General Counsel of Renold Parent and the respective legal representatives of the companies in the Renold Group assess the responses from the supplier questionnaires and recommend appropriate follow-up action if and where appropriate.

Signed Attestation

This report was approved by the Board of Directors of Renold Canada on May 31, 2024.

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.

DATED as of May 31, 2024. I have the authority to bind Renold Canada Ltd.

By 
Name: Rick Hamilton
Title: President