



S A N M I N A

Fighting Against Forced Labour and Child Labour in Supply Chains

July 2024

Annual Report

1.0 Report Information

Report Revision Number: 1.0
Report Revision Date: July 9, 2024
Document Created: July 9, 2024
Financial Reporting Year: October 1, 2022 to September 30, 2023

2.0 Identifying Information

Legal Name: SCI Brockville Corp.
Business Name: Sanmina
Business Number: 119409274
Industry Type: Manufacturing
Entity Principle Location: Ottawa, Ontario, Canada
Parent Company Location: San Jose, California, United States of America
Entity Structure: Corporation

3.0 Purpose

This Annual Report is designed to comply with the Annual Report requirement as outlined in Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This document includes the steps that SCI Brockville Corp., doing business as Sanmina, has taken in the October 1, 2022 to September 30, 2023 financial year to prevent and reduce the risk of forced labour or child labour in the production or import of goods in the supply chain. This is not a joint report with any other entity.

SCI Brockville Corp., doing business as Sanmina, is also subject to reporting requirements under the UK Modern Slavery Act 2015 and California's Supply Chain Act. Sanmina has implemented a *Slavery and Human Trafficking* policy that outlines the following:

California Senate Bill 657 requires retailers and manufacturers which do business in California and have annual worldwide gross receipts over \$100 million to describe on their websites the extent to which they:

- Verify their product supply chains to evaluate and address risks of human trafficking and slave labor.



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- Conduct audits to ensure their suppliers adhere to company standards, require their direct suppliers to certify that materials used to make their products are from countries that do not engage in slavery and human trafficking.
- Maintain internal accountability standards for employees or contractors that fall short of company requirements.
- Ensure that employees who are responsible for supply side management receive training on human trafficking and slavery, with a focus on the risks within supply chains.

U. K. Modern Slavery Act 2015 requires every organization carrying on a business in the UK with a total annual turnover of £36m or more will be required to produce a slavery and human trafficking statement for each financial year of the organization. Sanmina meets this threshold for reporting under the Modern Slavery Act.

Sanmina's *Slavery and Human Trafficking* policy is posted on Sanmina's public website: <https://www.sanmina.com/social-responsibility/ethics-governance/anti-trafficking-slavery/>

4.0 Structure, Activities, and Supply Chains

SCI Brockville Corp. is a division of Sanmina, a global corporation that has a global supply chain, utilizing both local and international suppliers. SCI Brockville Corp. operates out of Ottawa, Ontario, Canada and produces goods inside and outside of Canada, sells goods inside and outside of Canada, distributes goods inside and outside of Canada, and imports goods produced outside of Canada into Canada.

SCI Brockville Corp. is listed on a stock exchange in Canada and meets the entity size related thresholds defined in Section 2 of the *Against Forced Labour and Child Labour in Supply Chains Act*.

5.0 Forced Labour and Child Labour Risk Prevention and Reduction

Sanmina prides itself on conducting its business ethically and responsibly and seeks to employ best practices in corporate governance and supply chain management. Sanmina has developed and implemented its Business Ethics Code of Conduct which sets out the measures we take to ensure we conduct business ethically and responsibly for the benefit of our shareholders, customers, employees, suppliers and other stakeholders.

The Sanmina Corporation *Code of Business Conduct and Ethics* is posted on Sanmina's public website: <https://www.sanmina.com/wp-content/uploads/2024/06/ENGLISH-CODE-OF-BUSINESS-CONDUCT-ETHICS.pdf>



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Sanmina has a zero tolerance approach towards any form of slavery, servitude, forced or bonded labor, or human trafficking. In this regard, Sanmina has adopted the Responsible Business Alliance (“RBA”) Code of Conduct (the “Code”). The Code provides that adopters must not use forced, bonded, indentured or prison labor, that work shall be voluntary and that workers shall be free to leave their employment. This policy precludes the use of unlawful child labor in accordance with the RBA and international standards. All of Sanmina’s plants adhere to this provision of the Code and Sanmina has notified all of its suppliers of its expectation that they adhere to the Code.

The Responsible Business Alliance (“RBA”) Code of Conduct (the “Code”) can be found on the RBA website:

https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf

In addition, Major Suppliers (as defined by the RBA) must complete a questionnaire by which they confirm whether they, too, have adopted the Code or participate in an equivalent social code in the countries in which they operate. This information is used to help Sanmina decide whether to select a supplier (other factors include cost, alignment of operations with our own, customer requirements, quality, shipping time and warranty). We conduct our supplier reviews internally and not through a third party or independent, unannounced audit. If a supplier fails to live up to our standards, including those contained in the Code with respect to labor rights and conditions, we may terminate our engagement with them and replace them with a supplier which does.

Sanmina has not identified any forced labor or child labor in our activities and supply chains. Any risks have been identified to the best of our knowledge and we will continue to strive to identify emerging risks.

Sanmina conducts a regular review and/or audit of the organization’s policies and procedures to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

6.0 Training

Sanmina provides training titled *Protecting Human Rights in the Supply Chain*. This course is mandatory for employees making contracting or purchasing decisions. The training covers:

- Human trafficking and modern-day slavery in today's supply chain
- How to identify human trafficking in the supply chain
- Responsibilities for suppliers and sub-suppliers



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7.0 Attestation and Approval

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity 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 *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, for the reporting year listed above.

I certify that all the information in this report is accurate and I have the authority to bind the organization.

Geoff Beale
Senior Vice President East Coast Operations

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Date