

AUTOKINITON

**Autokiniton Modern Slavery and Human Trafficking
Prevention Measures, Annual Report**

November 2024

This report is made pursuant to the Subsection 11(2) of the Fighting Against Forced Labour and Child Labour Supply Chains Act, Statutes of Canada 2023, Chapter 9 (the “Act”) and has been prepared by Autokiniton US Holdings, Inc. for itself and each of its subsidiaries and affiliates listed on Appendix A (collectively, “Autokiniton”).

The report summarizes the steps Autokiniton has taken to prevent and reduce the risk of forced labor and child labor within our operations and supply chain. Unless otherwise noted, the terms “we”, “our”, “us”, “Company”, and Autokiniton collectively refer to the entities on Appendix A.

If you have any inquiries concerning this report, please contact supplier.sustainability@autokiniton.com

About Autokiniton

Autokiniton is a leading North American supplier of propulsion-agnostic, structural automotive components and assemblies, headquartered in New Boston, Michigan. In May 2018, Autokiniton US Holdings, Inc. was founded and acquired L & W, Inc. (now L & W, LLC d/b/a Autokiniton) and its family of companies (“L&W”). L&W is a leading Tier 1 supplier in the automotive industry, specializing in hot and cold metal stampings, welded assemblies, and tubular products. In September 2019, Autokiniton US Holdings, Inc. acquired Tower International, Inc. (NYSE: TOWR) and each of its subsidiaries and affiliates (collectively, “Tower”), a leading Tier 1 manufacturer of structural metal automotive components and supplier of metal stampings, welded assemblies, frame structures, and chassis structures. This combined group of companies has made Autokiniton the number two (2) Body-In-White and vehicle frame supplier in North America, employing approximately 5951 employees. The Company’s product portfolio is well-positioned for key automotive trends, including electrification, lightweighting and emission reduction regulations.

Autokiniton’s supply chain is complex with several tiers between material, components and services suppliers. Raw materials and components are sourced globally, and some materials are sourced and supplied by our customers (such as direct-buy steel). Services are sourced in the country where the service is provided and internationally.

Autokiniton Policies and Commitment to Human Rights

Autokiniton strives to be a good corporate citizen within the communities we operate. We believe that making a positive impact in the community is an important part of our overall principles. We expect our Suppliers to abide by all applicable employment, environmental, health and safety laws and regulations. Recognizing our supply chain spans many different regions around the globe, Autokiniton is committed to maintaining global working conditions and standards that result in dignified and respectful treatment of all associates within all our global operating locations, as well as those of our supply chain. Autokiniton has policies, procedures, and systems in place, to support the following standards.

- Child labor shall not be utilized. Underage labor, as defined by local labor law, will not be utilized unless it is part of a government approved training or apprenticeship program that clearly benefits the participants.
- Any form of forced or compulsory labor is prohibited.
- Workers, without fear of reprisal, intimidation, or harassment, should be able to communicate openly with management regarding working conditions. They shall also have the right to associate freely and join labor unions and workers' councils in accordance with local laws. In fact, 32% of Autokiniton's U.S. workforce is covered by collective bargaining agreements with the UAW and Steel Workers unions.
- Workers shall be protected against any form of harassment and discrimination in any form, based upon race, color, religion, age, sex/gender, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity, or expression, or any other characteristic protected by federal or local laws.
- Workers shall have a safe and healthy workplace that meets or exceeds all applicable standards for occupational health and safety.
- Workers shall be compensated with wages and benefits that are competitive and comply with local law, including minimum wages, overtime hours and legally mandated benefits.
- Working hours shall comply with all applicable local laws regulating hours of work.
- Anti-Corruption: Integrity and ethical conduct have always been an inherent part of our culture. Ethical conduct is one of the cornerstones on which Autokiniton's excellent reputation is built. Our customers count on it, but also all other stakeholders and all personnel working for Autokiniton. Therefore, there is no room for negotiation or interpretation when it comes to following our Supplier Sustainability Guide and Supplier Code of Conduct.

Supplier Contracts and Policies

Autokiniton has developed and implemented the Autokiniton Supplier Sustainability Guide and Supplier Code of Conduct (“Supplier Code”). The Supplier Code outlines Autokiniton’s requirements and expectations for our suppliers, contractors, and subcontractors and each of their suppliers, contractors and subcontractors in areas related to human rights, social responsibility, environmental stewardship and ethical business practices. The Code applies to any company that provides a product or service to Autokiniton and we expect that all Suppliers cascade these expectations and requirements to their Suppliers. Autokiniton reserves the right to terminate any Supplier relationship if the Supplier fails to comply with our requirements and expectations set forth in the Supplier Code.

Autokiniton is committed to protecting and promoting human rights and good labor practices in our operations, and Suppliers are expected to make the same commitments. We expect our Suppliers to abide by all applicable employment, environmental, health and safety laws and regulations. Suppliers are required to comply with laws governing the minimum working age and hour restrictions, established by local laws, or under the age of 18 where local laws do not specify minimum work age and/or hour restrictions, and to ensure workers do not perform work that, due to its nature or the circumstances in which it is performed, would endanger their safety, health or well-being, including night shifts, overtime, or hazardous work. Suppliers shall not use or condone forced labor, human trafficking, or any form of abusive disciplinary practices and must prohibit the use of bonded, indentured, or exploitive prison labor. Work must be undertaken for fair compensation and must not be undertaken to repay a debt incurred. Suppliers must never confiscate, destroy, conceal, and/or deny access to worker passports or other government-issued identity documents. Further, Suppliers are required to provide workers with written notification in a language well understood by them, stating in a truthful, clear manner, their rights, and responsibilities.

Suppliers are required to pay fair and appropriate compensation that complies with applicable laws regarding minimum and living wage and to pay wages in a traceable manner at a specified time without unauthorized deductions. Additionally, Suppliers are expected to recognize the rights to freedom of association and collective bargaining.

Contractors required to perform services in accordance with the Autokiniton Contractor Service Agreement and the Contractor Methods procedure to ensure work practices are in compliance with applicable laws and Autokiniton’s Code of Conduct and Ethics, including safe work practices and conditions.

Assessment of Risk, Due Diligence

Several of Autokiniton's corporate functions manage policies and business practices that have been implemented to manage social risks, including forced, child and slave labor.

Governance is managed by a Compliance Committee which oversees the compliance program including the Code of Conduct and Ethics, ethics training, and investigates any report of non-compliance.

Autokiniton's purchasing function is responsible for sourcing decisions. The Purchasing function works cross functionally with other departments to develop and implement the standards for our Suppliers. Further the Purchasing function has access to Supplier Assurance used to assess key supplier policies and business practices and determine risk in the supply chain.

Autokiniton is committed to continuing to improve our understanding of labor and human rights issues by engagement with key stakeholders including investors and customers. We actively participate in automotive supplier roundtables including Supplier Partnership for the Environment and review guidance documents distributed from credible sources such as Deloitte.

Remediation Measures

Forced Labor, Child Labor, Loss of Income to Vulnerable Families

No remediation measures were identified in the prior year.

Training

Autokiniton requires all associates to acknowledge and agree to comply with the Autokiniton Code of Conduct and Ethics annually. Additionally, our Purchasing team is in the process of assessing our key suppliers using Supplier Assurance to identify risks in the supply chain.

Our workforce is trained on labor aspects including safety. Policies, including the Autokiniton Code of Conduct are on-line and made available at kiosk in each facility. Autokiniton maintains an Ethics Hotline, which ensures an anonymous reporting mechanism for any associate to report ethics concerns which are investigated and reported to the Compliance Committee.

Effectiveness

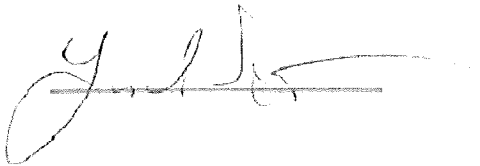
Autokiniton currently measures effectiveness of our effort to manage social risks, including forced, child and slave labor based on reports to the Ethics Hotline, and findings from management. In the coming year our supplier assessment process will be fully implemented through our recent partnership with Supplier Assurance who ranks supplier responses to the SAQ to determine and report risks, including forced, child and slave labor.

Additionally, Autokiniton implemented a compliance concern channel for suppliers to report Supplier Code of Conduct concerns or violations that is outlined in the Supplier Code of Conduct. In the last year there were no compliance concerns sent to the e-mail listed in the Supplier Code of Conduct for this purpose.

Lastly, in accordance with the requirements of the Act, and in particular section 11 thereof, as an Executive Officer of the entity or entities listed in Appendix A, I attest I have reviewed the contents of the report. I also attest that based on my knowledge and having applied reasonable due diligence, the information in the report is true, accurate, and complete as it relates to the purposes of the Act for the required reporting period.

I have the authority to bind Tower Automotive Operations USA I, LLC.

Signed:



Name: Larry Schroth

Title: Vice President – Program Management, Quality, Purchasing, Logistics

Company: Tower Automotive Operations USA I, LLC (entity of Autokiniton US Holdings, Inc.)

Date: 11/1/04

Appendix A

Autokiniton Entities

Autokiniton US Holdings, Inc.

L & W, LLC

Jaytec, LLC

Southtech, LLC

Oakland Stamping, LLC

L&W Cleveland, Inc.

Euclid Manufacturing Co., Inc

Haggerty Logistics, Inc.

Tower Automotive Operations USA I, LLC