



# **BILL S-211 REPORT**

**for**

## **Ultra-Fit Manufacturing Incorporated**

(May 17, 2024)

For the fiscal year ended March 31, 2024

*An Act to enact the Fighting Against Forced Labour and  
Child Labour in Supply Chains Act and to amend the  
Customs Tariff*





## INTRODUCTION TO ULTRA-FIT

Ultra-Fit Manufacturing (“Ultra-Fit”) is a North American leader in tube bending and parts manufacturing. Its manufacturing expertise covers a broad range of processes, from complex tube bending and forming to welded fabrication and sub-assemblies.

Founded in 1982, Ultra-Fit’s three decades of experience combined with our commitment to innovation offers customers unique flexibility and the ability to solve almost any tube bending problem. We take pride in helping customers manage their toughest production challenges whether they need a small custom order, large volume manufacturing, or something in between. Our equipment and processes have proven to be adaptable to a wide range of industries. Ultra-Fit serves customers across North America from our Toronto manufacturing facility. Ultra-Fit has been owned by Arva Inc. since 1998. Founded in 1956, Arva is a private equity company that helps businesses to grow and prosper.

**Ultra-Fit’s Vision:** Become the most innovative, competitive tubular solutions manufacturer in North America with the highest quality and service to our customers, regardless of size and industry.

**Ultra-Fit’s Mission:** To provide complex, value-added components and assemblies for low, medium and high-volume applications (programs) in the automotive, industrial and commercial markets by leveraging best in class technology, highest quality standards and utilizing a highly skilled and engaged human resources team.

Ultra-Fit works with industry-leading companies, primarily in the automotive and heavy equipment markets and are the trusted source for OE, Aftermarket, and performance exhaust products. The company guides projects from design through manufacturing to delivery. Ultra-Fit works closely with its customers to achieve the appropriate production system, from small batch runs to a constant supply of quality parts with just in time delivery.

Ultra-Fit’s success is the result of a company-wide dedication to excellence as demonstrated by ISO 9001:2015 certification, many customer certifications and LEAN process management philosophy. Its engineering expertise, skilled workforce and advanced manufacturing equipment ensure a creative, yet practical approach to every challenge. The result is consistent, reliable, high-quality precision on every Ultra-Fit project.

## ADDRESSING CHILD LABOR AND FORCED LABOR

Ultra-Fit Manufacturing is committed to engaging in employment practices that meet all ethical and legal standards, including laws and regulations related to forced and child labor, in the markets in which it operates. Similar to its internal commitment to preventing child labor and forced labor, the Company expects its suppliers to share and uphold these same commitments across their business operations as well. Further, the Company expects its suppliers to cascade these expectations through their supply chains – including to raw material, component, or ingredient suppliers.

The Ultra-Fit Business Ethics and Business Partner Code of Conduct identifies standards of business behaviour that Ultra-Fit strives to adhere to in all aspects of operation. We expect all our Business Partners including but not limited to employees, vendors, suppliers, contractors, both domestic and abroad, to adhere to the same standards of conduct in their operations. Ultra-Fit Manufacturing is committed to conducting business with honesty and integrity with respect to its stakeholders, customers, employees, supply chain, competitors, and all other entities with whom it has a business relationship.

There shall be no use of child labour at Ultra-Fit or its Business Partners. The minimum age for employment shall be greater than or equal to the age of compulsory education. Any form of exploitation of children, slavery, trafficking, forced labour are prohibited and unacceptable in Ultra-Fit's supply chain.

This report is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. It outlines the approach and initiatives by Ultra-Fit Manufacturing to identify and address the risk of forced labour and child labour in its business operations and supply chains during the financial year commencing April 2023 and ending March 2024. As Ultra-Fit is committed to upholding and protecting human rights in alignment with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labor Organization Core Conventions.

## COMPLIANCE WITH LAWS AND BUYER POLICIES (SECTION 11)

Seller, and any goods or services supplied by Seller, will comply with all applicable laws, rules, regulations, orders, conventions, ordinances or standards of the country(ies) of destination that relate to the manufacture, labeling, transportation, importation, exportation, licensing, approval or certification of the goods or services, including, without limitation, those relating to anti-trust and competition, export control and economic sanctions, environmental matters, the handling and transportation of dangerous goods or hazardous materials, data protection and privacy, wages, hours and conditions of employment, subcontractor selection, discrimination, occupational health/safety and motor vehicle safety.

Seller further represents that neither it nor any of its subcontractors, vendors, agents or other associated third parties will utilize child, slave, prisoner, or any other form of forced or involuntary labor, or engage in abusive employment or corrupt business practices in the supply of Goods, including any labor practice which, if performed in Canada, would constitute a violation of the Fighting Against Forced

Labor and Child Labor in Supply Chains Act, SC 2023, c. 9, the Customs Tariff, SC 1997, c.36, the Customs Act, RSC 1985, c.1 (2nd Supp.), and any regulations made thereunder. Upon Buyer's request, Seller will certify to Buyer in writing the origin of any ingredients or materials in the goods. Seller will promptly provide, in writing, any information regarding the goods requested by Buyer so that Buyer may comply in a timely manner with reporting requirements under applicable law with respect to Consumer protection, "conflict minerals" or similar materials or ingredients, if any.

## COMPLIANCE WITH LAWS AND POLICIES AS PER SUBSECTION 11(3)

Due diligence process that Ultra-Fit implemented in relation to forced labour and/or child labour is related to embedding responsible business conduct into policies and management systems. However, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks. However, neither we have identified any forced labour or child labour in our activities and supply chains, nor we have identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

As per Ultra-Fit's Corporate Social Responsibility and Code of business Conduct policy and training, all employees (including those employees making contracting or purchasing decisions) are obliged to complete acknowledge the training, as the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains. Ultra-Fit is working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators. However, the Company has internal policies including its Supplier Code of Conduct and Code of Business Conduct that further reinforce and clarify its commitments to responsible labor practices, including preventing the use of forced labor and child labor. The Company's governance structure ensures that its policies related to forced and child labor are effective.

The Company has several mechanisms in place to ensure compliance with its policies and to continue mitigating the risk of forced and child labor being used in the Company's operations and supply chains.



## SUMMARY

Ultra-Fit Manufacturing remains committed to preventing child labor and forced labor within the Company's operations and by its suppliers. The Company is committed to engaging with its employees, suppliers and stakeholders on these concerns and continues to fortify its approach to reducing the risks associated with forced or child labor in the Company's business and supply chains, while ensuring compliance with applicable labor laws.

**Financial reporting year:** Fiscal Year-Ended March 31, 2024

**Revised version of fiscal Report:** No

**Joint report with other entities :** No

**Business Number:** 10544-0515

**Reporting entity's legal name:** Ultra-Fit Manufacturing Incorporated

**Headquarter of company:** Mississauga, ON, Canada

**Entity Structure:** Corporation

**Operational sector:** Manufacturing

**Entity Activities:** Producing goods (including manufacturing, extracting, growing, and processing in Canada and outside Canada)



## APPROVAL

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.

I have the authority to bind Ultra-Fit Manufacturing Incorporated

A handwritten signature in black ink, appearing to read "P. Cerullo", written over a horizontal line.

**Pasquale Cerullo**

**President (Ultra-Fit Manufacturing Inc.)**