

THE FLEX|N|GATE GROUP  
IN CANADA



REPORT ON ACTIONS  
TAKEN TO PREVENT AND  
REDUCE THE RISKS OF  
FORCED LABOUR AND  
CHILD LABOUR  
IN OPERATIONS AND  
SUPPLY CHAINS  
OF THE FLEX|N|GATE  
GROUP  
IN CANADA  
FOR THE FISCAL YEAR  
ENDING 31 DECEMBER  
2023

*Fighting Against Forced Labour  
and Child Labour in Supply Chains*

2023

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## REPORT ON ACTIONS TO FIGHT AGAINST FORCED LABOUR AND CHILD LABOUR IN OPERATIONS AND SUPPLY CHAINS

### FLEX|N|GATE GROUP IN CANADA - 2023

#### ARTICLE 1 THE REPORTING CONTEXT

Section 1.1 The Modern Slavery Act. In this report, “Flex Canadian Group”, “we”, “our”, and “us” means the entities listed in Section 1.2 below. Federal law in Canada - the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* S.C. 2023, c.9 (the “Act”) - requires that our Canadian companies state the actions taken during the most recently completed fiscal year to prevent and reduce the risk of forced labour or child labour within our operations and supply chains.

Section 1.2 A Joint Report. This is a joint report (“Report”) under the Act and was prepared by Flex|N|Gate Group’s member entity, Ventra Group Co. (“Ventra”) for itself and for its Canadian affiliates Flex-N-Gate Canada Company, a Nova Scotia unlimited liability company, Vari-Form Manufacturing Inc. / Les Fabrications Vari-Form Inc., an Ontario corporation and Ventra Assembly Company, a Nova Scotia unlimited liability company (collectively, the “Flex Canadian Group”).

For the purposes of the Act, the reporting entities covered in this report include companies that have been wholly-owned and/or operated by the Flex|N|Gate Group of companies ([www.flex-n-gate.com](http://www.flex-n-gate.com)) in Canada between 1 January 2023 and 31 December 2023, inclusive (the “Report Period”).

Section 1.3 The Flex|N|Gate Group.

(a) About Flex|N|Gate. The Flex|N|Gate Group of companies (the “Group”) is a privately-owned, leading designer, manufacturer and supplier of parts, components, sub-systems and systems for the automotive industry with a global platform of 78 integrated manufacturing, product development and advanced product engineering facilities. The Group employs a global team of over 25,500 individuals. Founded in 1956, it ranked as one of America's Best Large Employers by Forbes magazine in both 2021, 2022 and 2023 and one of Canada’s Best Large Employers in 2024. The Group operates facilities in the United States, Canada, México, Spain, France, Germany, the United Kingdom, China, and Argentina. The Group’s headquarters and principal operations are in the United States and it is 100% American-owned.

(b) Flex|N|Gate Group Customers. Flex|N|Gate Group products are found on virtually all of the world’s leading automotive badges.

(c) Flex|N|Gate Products. The Group companies design, manufacture and supply the global automotive industry with complete advanced bumper assemblies,

mechanical components, assemblies and systems, exterior painted plastic trim, interior plastic, stamped body-in-white, complex welded structural assemblies and advanced forward vehicle, and rear vehicle lighting for the passenger automotive market. The Group provides a complete range of design services from initial conceptual renderings to fully functional prototypes and models. The Group owns over 540 U.S., Canadian, Mexican and World Intellectual Property Organization patents and over two dozen pending patent applications.

(d) The Group’s Achievements. Flex|N|Gate Group’s achievements for quality, technical development, reliability, diversity and advanced product development are consistently recognized within the automotive industry. In 2022, Automotive News ranked the group as North America’s 7th largest supplier (31st largest globally).

(e) Minority Certification. In the United States, Flex|N|Gate Group has enjoyed over two decades of minority supplier certification (NMSDC National Minority Supplier Development Council). NMSDC re-certification is currently pending, and approval expected on 31 May 2024. During a comparable timeframe, in Canada, the Group including its Flex Canadian Group member entities, have been proud Canadian Aboriginal and Minority Suppliers (awarded by the Canadian Aboriginal and Minority Supplier Council).

(f) Flex|N|Gate Group’s History in Canada. Flex|N|Gate Group has operated production facilities in Canada continuously since 1998 through the Flex Canadian Group. The Flex Canadian Group companies operate exclusively in the Province of Ontario.

#### Section 1.4 Ventra Group Co.’s Canadian Corporate Structure.

(a) Ventra Group Co. Ventra is a Nova Scotia unlimited liability company with a registered address located at 1300, Purdy’s Tower 2, 1969 Upper Water St., Halifax, Nova Scotia, Canada, B3J 3R7, and is licensed as an extra-provincial corporation in Ontario with its registered office at Suite 700, One Riverside Drive West, WINDSOR, Ontario, Canada N9A 5K3.

(b) Ventra’s Products, Operations & Customers. Ventra and its Flex Canadian Group affiliates engage in the design, manufacturing, sales and service of stamped, welded, hydro-formed, plastics injection molded, and painted components for the automotive passenger vehicle and light truck industry in Canada and elsewhere in the world. Flex Canadian Group products include automotive vehicle structures (e.g. vehicle frames, bumpers, structural elements, body elements, etc.), painted and unpainted exterior fascias (plastic bumpers), fluid reservoirs, plastic exterior body elements, and various mechanical assemblies, including brake pedals. Ventra also operates a leading-edge advanced lithium-ion battery research and development and prototype battery production center in Windsor, Ontario.

Flex Canadian Group customers are original equipment automotive vehicle manufacturers and their various production and service part divisions. We are a Tier 1 supplier to our customers (and a Tier 2 Supplier to other Flex|N|Gate Group entities outside Canada). We purchase raw materials, parts, sub-components, components, sub-systems and systems from many Tier 2 suppliers (including other Flex|N|Gate Group entities outside Canada).

(c) **Ventra's Supply Chains.** Our predominant purchased raw materials comprise steel, plastics, resins and paint. We purchase materials and goods locally to the greatest degree possible, but for certain components, the nature of our business requires that our supply chains remain global in geographical scope. We also purchase manufacturing equipment, including stamping presses, welding equipment, robotic assembly lines, dies, tools and fixtures, injection molding machines, paint lines, and EV battery production equipment. We purchase electronics, sensors, actuators, lighting systems and various sub-components which we integrate into the products we supply to our customers. Our Flex-Ion™ battery innovation center procures highly specialized battery testing, formation and assembly equipment and diverse battery and electrode-active raw materials.

Section 1.5 **Authority for this Report.** This Report is made pursuant to section 11(2) of the Act and was approved by each Flex Canadian Group's Board of Directors on 28 May 2024.

## ARTICLE 2 INTRODUCTION

Section 2.1 **Our Risks of Forced and Child Labour.** Flex Canadian Group entities employ over 4,000 associates in total across 11 production and design facilities in Ontario, Canada. The Group plays a role in promoting respect for human rights and responsible business practices across our world-wide operations, including the Flex Canadian Group members companies. We recognize the risks of forced labour and child labour that exist in our operations and supply chains, and we therefore acknowledge that reducing and striving to eliminate all such risks requires that we collaborate with our communities, suppliers, associates and other stakeholders, meaningfully and persistently.

Section 2.2 **This Report's Effective Period.** This Report outlines Flex Canadian Group's governance processes, investigations, measures, and the progress we have achieved in the Report Period to identify, mitigate, and eliminate the risks of forced labour and child labour across our supply chain.

## ARTICLE 3 STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Section 3.1 **Global Supply Chains.** Flex|N|Gate Group, including the Flex Canadian Group members, have established comprehensive supply chains whose purposes include purchasing raw materials, services, equipment, and other manufactured products for our

manufacturing production needs. We work with suppliers already approved by our customers, and with those suppliers who demonstrate sufficient continuing commitment to the automotive industry through the pursuit of recognized standards of improvement, operational excellence, community leadership, including adherence to universal principles in favour of universal human rights and against forced and child labour. We expressly communicate that our suppliers must adhere to global principles in favour of universal human rights and against forced and child labour.

We hold all suppliers to high standards of ethical conduct, including requiring them to establish, maintain and demonstrate their own processes that prohibit the use of forced labour and child labour in their operations and their supply chains.

#### ARTICLE 4 FLEX|N|GATE GROUP'S POLICIES AND DUE DILIGENCE PROCESSES

**Section 4.1 Global Policies; Local Application.** Flex Canadian Group has implemented measures to assure due respect for all relevant human rights both within our own organization and along our entire supply chain. We have documented our affirmative stances favouring the promotion of human rights, rejecting discriminatory practices, modern slavery, human trafficking, forced labour and child labour and affirming fair and equitable treatment of all stakeholders.

Our commitment to respect for and promotion of human rights is a key element within the Group's common directive to its member entities across their operations and group value chain, and extends to their dealings with all suppliers, business partners, contractors, and customers.

**Section 4.2 Diligence Activities and Codes.**

(a) **Published Ethics and Community Principles.** The Group's affirmation of human rights and rejection of forced labour and child labour are central features of our published Supplier Code of Conduct policy and our Community Principles statement. These documents apply to each Group entity, including each Flex Canadian Group member entity.

(b) **The Role of Our HR Specialists.** Individual human resources departments within each Flex Canadian Group facility are tasked with ensuring that newly hired associates meet minimum age requirements, are eligible to work within Canada, and are not subject to any form of forced or involuntary labor, subject to all applicable local, provincial, and federal regulations. We adhere to the laws, guidelines, and standards set forth by the jurisdictions in which we operate, including the Province of Ontario and the federal laws of Canada which apply in Ontario. Our commitment to regulatory compliance is integral to our operations, ensuring that we conduct business ethically and responsibly.

(c) **How We Communicate Ethics.** In the course of hiring and on-boarding associates, we furnish each individual with printed (or online links to) copies of: (i) our Code of Business Conduct and Ethics, and (ii) our Supplier Code of Conduct. We make these policy statements continuously accessible to each associate in the Flex Canadian Group through a continuously accessible global corporate intranet. Therein, associate employees learn about and acknowledge our expectations of their ethical conduct and their vigilance in assuring that each supplier adheres relentlessly to the high ethical principles by which we operate our own businesses.

Beyond merely establishing a baseline for appropriate business conduct, our policies benchmark personal performance requirements related to our associates' fairness and respect for the dignity and worth of each individual and organization with whom we interact and foster a continuing respect for fundamental human rights. This is a foundation upon which Flex Canadian Group entities build and expand, intending that all associates work within a framework that combines the most favourable possible work environment which concurrently exemplifies and reinforces our high values for individual human rights.

(d) **Our Community Principles.** Our commitment to support the expansion of human rights is grounded in our firm published declaration of opposition to any use of forced and child labour in our operations and our supply chains. Our Community Principles explain, embody and exemplify our affirmative value for positive human rights and they specifically address our corporate stances against all instances of forced and child labour in our operations and supply chains.

(e) **Actions Taken in 2023.** We commit to affirmatively combatting slavery and human trafficking within our operations and supply chains. In 2023, we updated and republished a new Supplier Code of Conduct. This Code expressly confirms that forced and child labour are strictly prohibited.

Our suppliers must also adhere to our Standard Terms and Conditions of Supply which contain specific provisions reiterating - as a continuing condition of entitlement to do business with us - our opposition to forced and child labour, and our requirement that each supplier adopt and abide those obligations.

Each member of the Flex Canadian Group is dedicated to continuous improvement in our relentless efforts to address the problems of forced and child labour in our operations and supply chains. We regularly review and update (and will continue to review and update) our policies and procedures to assure alignment with best practices and legal requirements and compliance with our stated principles and policies.



ARTICLE 5  
IDENTIFYING AND REPORTING RISKS

Section 5.1 Risk Reporting; Multiple Access Points. We offer individuals who wish to report a business concern (including a child or forced labour) multiple channels to communicate unethical or unsafe or potentially unethical or unsafe behaviors and situations. These include a whistleblower hotline, direct employment feedback, right of escalation and iterative feedback. We encourage all stakeholders to report any instances of modern slavery or human trafficking they encounter, including by doing so anonymously.

Section 5.2 Anonymous Reporting: Lighthouse™. The Group proactively manages forced labour and child labour risks by providing an external, independent, global reporting portal that uses a free telephone line accessible 24 hours a day, 7 days a week. The hotline is available to any individual to report all unethical and safety violations, including child labour or forced labour concerns. It is persistently available to the member entities in the Flex Canadian Group.

Maintained by a confidential and third person agency, The Lighthouse Services, Inc. (“Lighthouse™”) provides a hotline service made widely available to employees, suppliers, and external stakeholders. Reports can be made by phone, email or through our website, always anonymously. We expressly assure callers/reporters that all reports will be received without fear of attribution or reprisal.

Lighthouse™ reports are recorded, transcribed and are reviewed immediately, both centrally in our security department and locally at plant levels, as required. We take each Lighthouse™ report seriously and, if the reporter expressly requests such contact, we reach out to each caller/reporter immediately to continue our investigation. Potential claims are evaluated, properly disseminated, and fully investigated using an industry-tested Lighthouse Investigation Procedure.

Lighthouse™ reports customarily lead to either specific remediation of reported situations of concern or confirmation that no such situations are present.

Section 5.3 Staff Allocated to Modern Slavery Compliance. In 2023, we established and now maintain a team of specialists to oversee compliance with relevant laws and regulations regarding modern slavery and human trafficking. This team comprises of member representatives from various functions including human resources, procurement, customs and corporate compliance, and legal.

Section 5.4 Continuing Education of our Team Members. We actively participate in industry initiatives and training programs designed to enhance transparency and foster ethical conduct in operations and supply chains. We actively collaborate with other organizations, including customers and suppliers to exchange knowledge and best practices in combatting slavery and human trafficking.



Section 5.5 Planned Risk Evaluation. In 2023, we committed to engage in a focused risk assessment to specifically identify potential areas of vulnerability to modern slavery and human trafficking within our operations and supply chains. This assessment includes analyses of our geographic footprints and supply chain structures. We intend that all forced labour or child labour concerns we receive through our customer or supplier affiliations, will be promptly and fully investigated, and pursued through to the implementation of a fair and equitable conclusion for all affected.

## ARTICLE 6 REMEDATION MEASURES

We hold our suppliers to high standards of ethical conduct. Flex|N|Gate Group communicates its expectations regarding human rights and labour practices through our Supplier Code of Conduct and Standard Terms and Conditions of Supply. We actively engage with suppliers to ensure compliance with these standards.

Our continuing identification of the risks of forced labour or child labour in our businesses requires that we conduct a comprehensive review of our operations and supply chains, including both our direct suppliers and their subsidiary tier suppliers.

Nothing has yet come to our attention to date that indicates we need to take any direct actions or implement any remediation measures concerning forced or child labour. Regardless, our Standard Terms and Conditions of Supply empower us to design and implement appropriate remediation measures where required and hold our suppliers responsible for assuring the remedial effectiveness.

## ARTICLE 7 ASSOCIATE TRAINING

Section 7.1 Policy Publication. We make our Supplier Code of Conduct policy and our Community Principles statement readily and continually available to our employees, both at time of hire, and on our global corporate intranet. Our code of conduct and ethics expectations against the evils of modern slavery are also hard-coded into our Standard Terms and Conditions of Supply, thereby forming a binding and enforceable contract of performance between each of our member entities and their respective suppliers.

Section 7.2 Continuing Education of Employees. In 2023, we resolved to conduct additional, targeted employee training to amplify our message and broaden our commitment against modern slavery. We will work to be certain our employees understand these expectations and are empowered to freely bring any concerns forward that may require investigation.

## ARTICLE 8 ASSESSING EFFECTIVENESS

In 2023, we focused on rigorously deepening our understanding of the broader expectations of sustainability, especially as they apply to forced labour and child labour. With this amplified knowledge, we have now reassessed and revised several of our foundational documents and policies.

We assessed our alignment to these sustainability expectations using multiple iterative sustainability surveys, responses and written evidence which we submitted to third-person sustainability agencies. These independent agencies in turn ranked us with specific scores and comprehensive feedback on our current processes, providing us with meaningful guidance on how best to aim or future efforts to improve our performance and eliminate modern slavery within our businesses.

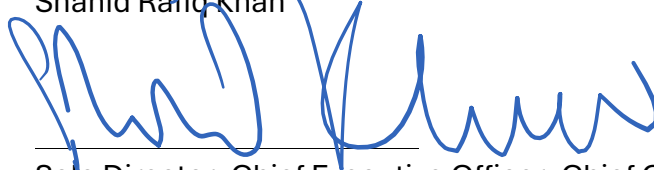
ARTICLE 9  
APPROVAL AND ATTESTATION

The 2023 joint report was approved with effect on 28 May 2024, pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of each of Ventra Group Co., Ventra Assembly Company, Flex-N-Gate Canada Company and Vari-Form Manufacturing Inc. / Les Fabrications Vari-Form Inc.

In accordance with the requirements of the Act, 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 Reporting Period.

Ventra Group Co. for itself an on behalf of its affiliates,  
Ventra Assembly Company, Flex-N-Gate Canada  
Company and Vari-Form Manufacturing Inc. / Les  
Fabrications Vari-Form Inc.

Shahid Rafiq Khan



Sole Director, Chief Executive Officer, Chief Operating  
Officer & President  
29 May 2024