



## **Modern Slavery Statement 2023-2024**

### **The Fight against Forced Labour and Child Labour in Supply Chains Act**

#### **Introduction from the Board of Directors & Management**

At Weber Manufacturing Technologies Inc. (Weber Manufacturing), we are committed to maintaining a resilient supply chain that upholds international human rights and labour standards. We recognize our responsibility to ensure the well-being of the individuals who contribute to our raw materials and components and to actively combat modern slavery, including forced labour and human trafficking, in our supply chain.

Weber Manufacturing has a fully owned subsidiary in Germany and due to the company's size, does not have any reporting obligations in that jurisdiction.

#### **Organizational Structure and Operations**

Founded in 1962 Weber Manufacturing is a privately owned corporation headquartered in Midland, Ontario (Ontario Corporation Number 85533 3381). We operate three plants totaling 227,500 ft<sup>2</sup>, employing approximately 210 individuals.

Weber Manufacturing is a fully-integrated mold manufacturer serving the Automotive Interiors & Exteriors, Aerospace and Home & Building industries. Our tooling capabilities encompass various processes including spray, slush, compression, injection, RTM, infusion and autoclave. Additionally, our in-house model shop develops master models made from leather wrap or select wood grains, offering models in silicone, epoxy and urethane tooling board. Our tooling are primarily exported overseas and into the US.

We also own the MasterGrain brand, manufacturing fiberglass door entry systems. While our door components are distributed mainly in the US and Canada and our door entry systems are assembled and sold within Canada.

Weber Manufacturing also operates a Nickel Vapour Deposition facility. This facility is capable of producing nickel shapes in 99.98% pure nickel; to high precision, for molds or complex nickel components, including fine surface detail, grains, and textures. Tools made using NVD nickel shells offer many flexible design options and critical advantages not available with any other tool-making. We also make nickel coated graphite powder from this facility and sell this product to US and overseas.

## **Our Supply Chain**

Weber Manufacturing's supply chain is mainly in Canada and the US, but we also buy from China, Germany, UK and Italy. We procure raw materials and components for manufacturing our tooling, powder, and door products, including aluminum castings, steel and aluminum billets, nickel powder, components, and fiberglass sheet molding compound (SMC) resin.

While nickel powder and fiberglass SMC resin are procured from large-scale, internationally recognized corporations, other products and components are sourced from suppliers with extensive experience in the manufacturing and automotive sectors. All key suppliers adhere to internationally recognized quality systems such as ISO 9000 and ISO 26000. Additionally, Weber ensures compliance with industry requirements, including the absence of Conflict Minerals, through industry-standard reporting systems.

## **Policies and Due Diligence**

Weber has established Policies and Procedures aligned with combating Forced Labor and Child Labor, including:

- Social Compliance Policy
- Ethics Policy
- Hiring Policy
- Illegal Labor Policy
- Modern Slavery Remediation Policy
- The Supplier Quality Survey
- The Supplier Quality Questionnaire

## **Risk Assessment**

Weber is committed to upholding human rights and ensuring that forced labor and child labor are not present within our organization or supply chain. In order to assess risk we conducted an internal assessment of risks of forced labour and/or child labour in our own activities and supply chains.

Weber mandates an annual self-audit questionnaire for all raw material and component suppliers, focusing on Labor and Human Rights. Key suppliers identified through a risk assessment process undergo the same questionnaire. Responses are reviewed for compliance and maintained for record-keeping and potential review.

## **Remediation**

If forced/child labour is identified, we have established a remediation policy to address it. The Weber Manufacturing process for responding to violations includes the following steps:

- Conduct an initial assessment of the allegations to ensure that there is sufficient information to understand the exploitation discovered and remedy it.
- Ascertain if a supplier or labour provider is implicated.
- Report the allegations to relevant authorities.
- Capture evidence about the violations, using an independent third party if necessary.
- Gather information from those affected.
- Take immediate steps to correct the situation for the worker, which will need to be tailored to their individual circumstances.
- Where possible, contribute to programs and projects aimed at providing victim support.
- Work with local authorities and competent local organizations to provide assistance (on the express consent of the victim).
- Review progress over a suitable time period and verify that progress with local authorities and local organizations.
- Document remedial steps taken.
- Build learnings into remediation procedures and operational procedures to prevent re-occurrence.

## **Training**

Weber schedules mandatory annual training sessions for all team members on forced labor and child labor, covering various learning outcomes:

- Understanding company policies and reporting procedures
- Recognizing the impacts within global supply chains
- Identifying and evaluating risks
- Exploring the effects on business
- Learning about the legal framework and best practices for risk mitigation.

Moreover, Weber's leadership and purchasing team members undergo training on Bill S-211 and steps for compliance, focusing on:

- Defining forced and child labor
- Emphasizing the significance of labor laws, including Bill S-211
- Describing the penalties and enforcement mechanisms of Bill S-211
- Outlining compliance procedures
- Fulfilling reporting requirements.

All training is conducted via online modules, including materials from external content providers, internal policy details, and quizzes to enhance understanding.

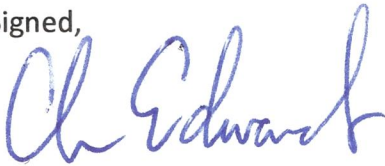
## **Assessing Effectiveness**

Weber verifies compliance with the requirements of the Forced Labor and Child Labor Act through internal assessments of our facilities in Midland, Ontario, and by selecting reputable,

long term, qualified, and regulated entities for our supply chain and by reviewing the responses to the annual supplier self-audit questionnaire for compliance. Effectiveness of compliance is further verified by senior management through the review of all policies, procedures, and assessments listed in this report.

This statement, made pursuant to Bill S-211, The Fight against Forced Labor and Child Labor in Supply Chains Act, for the financial year ending 12/31/2023, meets all requirements specified in subsection 11(3). This statement is issued on behalf of Weber Manufacturing and approved by our board of directors.

Signed,

A handwritten signature in blue ink, appearing to read "Chris Edwards". The signature is fluid and cursive, with the first name "Chris" and last name "Edwards" clearly distinguishable.

Chris Edwards  
President & CEO  
Weber Manufacturing Technologies Inc.