



Government of Canada BILL S-211

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

Armada Toolworks LTD - Modern Slavery Statement for the Financial Year ending December 31, 2023

Initial Report dated April 17, 2024

This statement is made pursuant to **Bill S-211, An Act to enact the Fight against Forced Labour and Child Labour in Supply Chains and to amend the Customs Tariff**. This statement outlines the approach and initiatives by Armada Toolworks LTD to identify and address the risks of forced labour and child labour in our business operations and supply chains during the financial year commencing January 1, 2023 and ending December 31, 2023.

Armada Toolworks LTD (Armada) operating as Armada Automotive has been in existence since 1971 and is fully committed to respecting human rights and ensuring our supply chain is free from forced labour and child labour (also known as Modern Slavery).

Armada does not have any manufacturing or other entities in any other jurisdictions and is thus does not have any reporting obligations in any other jurisdictions.

Company Structure

Armada Toolworks LTD is a privately owned corporation incorporated in the province of Ontario (Ontario Corporation Number 001404261) located at:

**6 LOF Drive
Lindsay, Ontario
Canada, K9V 4S5**

Armada is active in the automotive manufacturing industry. Armada designs, develops and manufactures automotive parts such as interior door handles. Armada sells these parts to the North American auto industry having both OEM and Tier I customers. Armada's factory processes include plastic injection molding, zinc die casting and assembly. The automotive components are shipped from the Lindsay facility to customers in Canada, the USA, Mexico, and China. Armada

is located in a 14,000m² facility in Lindsay Ontario and employs 247 people, which includes 230 full-time and 17 temporary associates. Associates are a combination of office & technical salaried personnel and skilled & unskilled hourly associates. The hourly associates are covered by a collective agreement and are represented by Unifor Local 222.

Armada has completed an internal assessment to ensure that all Armada employees are here of their own free will and are of proper hiring age. Proof of that assessment is available upon request.

Armada uses two local temporary staffing agencies to supply temporary workers when required. Both agencies are providing DOB (Date of Birth) information before any employee arrives for their first day of work. Temporary workers are paid a fair wage that meets all Ontario and Canada minimum wage requirements

Supply Chain

Armada has more than 70 suppliers which are located across Canada, the USA, China, Taiwan, Italy, India and Germany. Armada uses both direct and indirect suppliers. The supply chain produces products and processes using some of the following:

- Plastic resin formulation, processing and extrusion
- Zinc cast metal processing and alloying
- Ferrous metal stamping and machining
- Fastener, pins and springs metal forming
- Small component assemblies to create electric switches, cameras, speakers
- Polishing, painting, chrome plating, corrosion protection

Plastic resin is purchased from large scale, internationally known, private or public corporations. All other products and processes are purchased from suppliers with a long history of being in the automotive and other manufacturing industries. The international automotive industry has had requirements in place for several years relating to forced and child labour. Armada's suppliers have internationally recognized quality systems (such as ISO 9000 and IATF 16949) in place to meet all industry requirements. As an automotive supplier, Armada also ensures that all materials or components coming to Armada are free of any Conflict Minerals using industry required reporting systems. Armada provides each supplier a copy of our Supplier Quality Manual that lays out specific requirements on all aspects of the supply chain (a copy of the Armada Supplier Quality Manual is available at www.armadatoolworks.com). There are two specific requirements on page 9 of that manual related to this statement topic:

Included in the **Armada Supplier CSR Code of Conduct** are the following:

1. No Forced Labour (Respect the free will of all of your workers and do not use forced labour)
2. No Child Labour (Do not employ children under the minimum employment age).

Additionally, Armada requires an annual self-audit to be completed by all direct material and process suppliers. This audit has been updated and implemented so that each supplier must complete the section

which addresses Labour and Human Rights. Every supplier must fill out and return the audit to continue to be an active supplier to Armada. Responses to the self-audit are collected, reviewed for compliance, and kept on record and may be reviewed upon request.

Policies and Due Diligence

Armada has existing Policies and Procedures in place that include elements pertaining to **The Fight against Forced Labour and Child Labour**. These are:

- The Corporate and Social Responsibility Policy
- The Ethics Policy
- The Supplier Quality Manual

These policies and procedures are available for review at www.armadatoolworks.com.

Forced Labour and Child Labour Risks

Armada is committed to respecting human rights and ensuring that forced labour and child labour is not utilized to create any product or process within our supply chain.

- Armada has identified potential risks within the supply chain:
 - Procurement of raw materials, components and processes
 - Use of temporary, seasonal labour in raw material production by overseas suppliers

Remediation Measures

Armada has assessed its internal activities and responses from our supply chain self-audits and has found that there is no known risk of forced labour or child labour. The question of remediation is considered 'not applicable'.

Remediation of Loss of Income

Armada has assessed the responses from our supply chain self-audits and has found that there is no known risk of forced labour or child labour. The question of remediation of loss of income is considered 'not applicable'.

Training

Armada has completed training with all of employees (full-time and temporary) regarding **Bill S-211 Forced Labour and Child Labour** during our Employee Town Hall meeting held on March 21, 2024. Evidence of that training is available upon request. This training will be repeated at least annually.

Assessing Effectiveness

Armada is verifying the effectiveness of meeting the requirements of the **Forced Labour and Child Labour Act** through the internal assessment of the facility located at 6 LOF Drive, Lindsay Ontario, by choosing reputable, long term, qualified, and regulated entities to be in our supply chain and by reviewing the

responses to the annual supplier self-audit for compliance. Effectiveness of compliance is further verified by senior management through the review of all policies, procedures and assessments listed in this statement. All steps to fight **Forced and Child Labor** are listed in this statement to be in full compliance with subsection 11(1) of the Act.

This statement is made pursuant to Bill S-211, **The Fight against Forced Labour and Child Labour in Supply Chains Act** for the financial year ending 12/31/2023. The statement is compiled and written to meet all requirements of the act, specifically all requirements listed in subsection 11(3). This statement is issued on behalf of Armada Toolworks and approved by our board of directors.

Signed,



Chris van den Berg

President

Armada Toolworks LTD

April 17, 2024



Government of Canada BILL S-211

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

RPS Composites Inc. - Modern Slavery Statement for the Financial Year ending December 31, 2023

Initial Report dated May 7, 2024

This statement is issued in compliance with Bill S-211, An Act to enact the Fight against Forced Labour and Child Labour in Supply Chains and to amend the Customs Tariff, for the fiscal year January 1, 2023, to December 31, 2023. It outlines the measures RPS Composites Inc. has implemented to identify and mitigate the risks of forced and child labour within our operations and across our supply chain.

Company Overview and Structure

RPS Composites Inc., part of the RPS Industrial Group (RPSIG), has been a leader in manufacturing and servicing high-performance, corrosion-resistant tanks, vessels, and piping systems since 1956. Incorporated in New Brunswick under Corporation Number 635986, our headquarters are located at:

740 Main Street,
Mahone Bay, Nova Scotia,
Canada, B0J 2E0

With additional manufacturing units in Maple, Ontario, and Mobile, Alabama, RPSIG employs nearly 180 individuals and operates in a global market, distributing products to countries including the United States, Jordan, Chile, Australia, Canada, Mexico, and Indonesia.

Policies and Commitments

RPS Composites Inc. is committed to upholding human rights and ensuring that our global supply chain is free from forced and child labour. We adhere to a strict zero-tolerance policy regarding modern slavery. Our Corporate Social Responsibility and Ethics policies reflect our commitment to international human rights standards and are underpinned by compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the International Labour Organization's Articles 6 and 7.

Due Diligence and Risk Management

We conduct thorough due diligence to identify and assess risks related to forced and child labour across our operations and supply chain. This includes regular audits of our direct and indirect suppliers, particularly those involved in the procurement and processing of raw materials such as resin and fiberglass mat. Our Supplier Quality Manual, provided to all suppliers, outlines specific requirements to uphold our standards against forced and child labour.

Effectiveness and Training

The effectiveness of our policies and procedures is monitored through annual self-audits completed by suppliers, mandatory training sessions for all employees, and regular policy reviews conducted by senior management. These processes ensure ongoing compliance and help foster a culture of ethical business practice across all levels of the company.

Incident Management and Remediation Strategies

While no incidents of forced or child labour were reported in the current fiscal year, RPS maintains robust incident management and remediation strategies to address potential violations immediately. Documentation supporting all due diligence activities, audits, and training programs is available upon request and is subject to independent verification to ensure accuracy and integrity.

Annual Review and Continuous Improvement

Our commitment to human rights and the elimination of forced and child labour is an ongoing process. We continually seek to improve our practices and engage with external stakeholders to enhance the transparency and effectiveness of our efforts. This statement, approved by the Executives of RPS Composites Inc. and signed by our CEO, reflects our unwavering dedication to ethical business practices and compliance with all applicable laws.

Signed,

A handwritten signature in black ink, appearing to read 'Jeff Fraser', is positioned above the printed name and title.

Jeff Fraser
President and CEO



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 ft², 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.

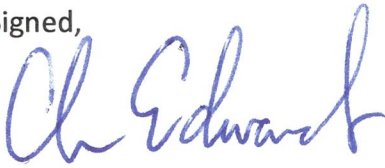
Assessing Effectiveness

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.