

## **Modern Slavery Statement for the Financial Year ended 2024**

### **INTRODUCTION**

At AarKel Tool and Die Inc, we are committed to upholding the highest standards of ethics and integrity in all aspects of our business operations. We recognize the responsibility we must respect and uphold human rights, including combating modern slavery and human trafficking in all its forms. This statement outlines our commitment to preventing modern slavery within our own operations and supply chain.

In alignment with the requirements of the Modern Slavery Act and Bill S-211, AarKel Tool and Die Inc. reaffirms its commitment to combatting modern slavery and human trafficking within its operations and supply chains. This report outlines the steps taken in 2024 to prevent and mitigate risks associated with forced labour, child labour, and human trafficking, and details our ongoing efforts to uphold the highest ethical standards.

### **Completed Steps**

#### **1. Policy Development**

We have developed and implemented a comprehensive Modern Slavery and Human Trafficking Policy. This policy is integrated into our broader governance framework and has been communicated to all employees, contractors, and stakeholders.

#### **2. Employee Training and Awareness**

In May 2024, we conducted mandatory training sessions for all employees covering:

- The risks and signs of modern slavery and human trafficking
- Our internal reporting procedures
- Compliance with Bill S-211 and the Modern Slavery Act

#### **3. Policy Framework Supporting Anti-Slavery Efforts**

We have updated the following policies and procedures to strengthen our stance against forced labour and child labour:

- Corporate and Social Responsibility Policy
- Code of Conduct and Ethics Policy
- Selection and Control of Suppliers and Contractors Procedure
- Supplier Corporate Social Responsibility Compliance Letter

### **Ongoing Actions**

#### **1. Risk Assessment and Due Diligence**

We are conducting a thorough risk assessment of our operations and suppliers to identify and mitigate areas of potential vulnerability. Due diligence processes are being integrated into our procurement and audit procedures.

#### **2. Supplier Engagement**

All suppliers receive our Supplier Corporate Social Responsibility Compliance Letter, which must be signed and returned as proof of commitment to ethical labour practices. We are actively engaging with suppliers to ensure understanding and compliance.

#### **3. Continuous Improvement**

We regularly review and refine our policies, training materials, and compliance efforts based on evolving best practices, stakeholder feedback, and global developments.

### **Scheduled Steps**

#### **1. Reporting and Transparency**

We are preparing to implement robust reporting mechanisms and will publish an Annual Modern Slavery Statement in accordance with legal requirements and internal accountability standards.

### **Our Supply Chain**

AarKel Tool and Die Inc. works with 153 suppliers located across Canada, the United States, Mexico, China, and India. Our Supplier Code of Conduct prohibits the use of forced labour, child labour, and human trafficking. Key supply chain controls include:

- Supplier audits based on product complexity or criticality
- Maintenance of an approved supplier list in our ERP system
- Collection and review of supplier insurance and quality documentation
- Document control and expiry tracking by the Purchasing Department

### **Our Commitment**

AarKel Tool and Die Inc. remains steadfast in its mission to maintain a supply chain free from modern slavery and human trafficking. We understand that this is an ongoing challenge that requires continuous vigilance, cooperation, and accountability.

### **Conclusion**

In 2024, AarKel Tool and Die Inc. took significant steps toward identifying, preventing, and mitigating the risk of modern slavery within our operations and supply chain. We will continue to build on these foundations and partner with stakeholders to uphold human rights and ethical business practices.

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 AarKel Tool and Die Inc.**

A handwritten signature in black ink that reads 'Larry Delaey'.

**Larry Delaey  
President / CEO  
AarKel Tool and Die Inc.**