

Report of Consolidated Metco, Inc. for Fighting Against Forced Labor and Child Labor in Supply Chains Act (Canada) ("Report")

Reporting Period: October 1, 2023 to September 30, 2024

Reporting Entity: Consolidated Metco, Inc. ("ConMet"), a U.S. corporation duly formed under the laws of the State of Delaware.

Structure of the Reporting Entity and Overview:

- ConMet is a U.S.-based manufacturer and supplier for the commercial vehicle sector, principally supplying wheel end products (hubs, drums, rotors), plastic interior and exterior components, structural castings, as well as certain electrification and innovation products.
- ConMet operates pursuant to the requirements of the Amsted Industries Incorporated ("Amsted") Code of Ethics ("COE"). Among other things, the COE obligates ConMet to comply with all applicable labor and employment laws and uphold basic human rights across all operations and in all regions in which it does business. The COE expressly forbids the use of child labor, forced labor, or any engagement in human trafficking.
- ConMet does not hire, contract with, or do business with any company or entity that uses child labor, directly or indirectly.

Prevention and Remediation Measures:

- To support effective identification, prevention, and remediation across all areas of legal compliance, including child and forced labor, ConMet provides several avenues by which an employee can make a report to register a concern on an anonymous or self-identified basis about a workplace practice or perceived or actual misconduct, including making a complaint to a supervisor, any member of ConMet management or senior leadership, human resources, the third-party administered Amsted Corporate Compliance Helpline (via web, mobile device, or phone), any member of the Amsted Law Department, or any member of Amsted senior leadership. All reports of misconduct are investigated promptly and thoroughly.
- All ConMet employees are required to participate in annual training on the COE.

Supply Chain Risk Management and Mitigation:

- ConMet has a multi-tiered supply chain that includes a global pool of suppliers for goods, services, and materials to support the production and sale of ConMet's products. A significant majority of ConMet's suppliers are based in North America where child labor laws greatly mitigate the risk of illegal hiring and labor practices.
- The ConMet Supplier Code of Conduct establishes ConMet's requirements for all of its suppliers in several areas, but specifically labor and human rights. **Exhibit A** (attached) excerpts the portions of ConMet's Supplier Code of Conduct that are pertinent to child and forced labor.
- ConMet requires all Suppliers to agree to the Code.

Summary of Current State: ConMet has had no reports of and has never been made aware of any instances of forced or child labor occurring in its supply chain during the Reporting Period.

Assessing Effectiveness: ConMet utilizes supplier questionnaires, a supplier vetting and approval process, and supplier audits to assess and ensure compliance with ConMet's standards, including its prohibitions on child and forced labor.

A handwritten signature in black ink, appearing to read "BRobinson".

Brian Robinson
Vice President Purchasing

I have the ability to bind Consolidated Metco, Inc.

EXHIBIT A:
EXCERPTS FROM CONMET'S SUPPLIER CODE OF CONDUCT
PERTINENT TO THE REPORT

Consolidated Metco, Inc. ("ConMet"), together with our business units and subsidiaries (collectively, "the Company"), is committed to the highest standards of ethics and business conduct. This Supplier Code of Conduct (the "Code") sets forth our expectations for our entire community of product and service suppliers ("Suppliers") and aligns with the expectations we maintain for our own directors, officers, employees, and representatives. Our requirements and expectations in the Code reflect applicable laws, widely accepted international human rights principles, and our own internal policies and procedures.

Our Suppliers are critical to our success. In order to provide superior products and services to our customers in a responsible manner, we require suppliers to meet our expectations for ethics and compliance as set forth in this Code. ConMet understands and expects that our Suppliers will have their own internal codes of ethics and conduct; this Code is not intended to be an exhaustive list of all ethical and business conduct requirements. Suppliers are responsible for ensuring that the directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of a Supplier's contract(s) with ConMet. **If a contract requirement is more restrictive than the Code, the Supplier must comply with the more restrictive contract requirement.**

Supplier Obligations

Every Company Supplier must:

- Know and follow this Code.
- Report any non-compliance and transparently report remediation progress.
- Demonstrate appropriate internal controls upon request.
- Enforce a similar code internally and require that your suppliers do the same.
- Identify and use suppliers who adhere to the requirements of this Code and monitor those parties' compliance.

Labor and Human Rights

No Child Labor. The use of child labor is forbidden under all circumstances, and suppliers must ensure that child labor is not used in the performance of ConMet related work. The term "child" refers to any person under the minimum legal age for employment where the work is performed as set by local, state, or national authorities.

No Human Trafficking, Forced, or Compulsory Labor. Suppliers must comply with laws and regulations prohibiting human trafficking. Suppliers are forbidden from engaging in or benefiting from the use of forced or compulsory labor, including bonded labor, indentured labor, involuntary prison labor, slavery, or trafficking in persons. Workers shall be free to terminate their employment at any time and consistent with the terms of any applicable contract.

Fair and Legal Employment Conditions. Suppliers must comply with all applicable regulations, laws, and bargained-for provisions pertaining to employee wages, work hours, overtime, and benefits. A supplier shall inform its workforce of the basis on which they are paid and pay them in a timely manner. Deductions from wages as a disciplinary measure shall not be permitted.

No Discrimination or Harassment. Suppliers shall not allow or tolerate discrimination or harassment based upon race, color, religion, age, gender, sexual orientation, gender identity, national origin, disability, veteran status, genetic information, pregnancy, or other factors that may be covered by local law.

Respect Freedom of Association. Suppliers shall comply with applicable laws that recognize and respect the rights of employees to form and join workers' organizations, to associate freely, and to bargain collectively.

Reporting Misconduct. We expect suppliers to provide employees and business partners with access to adequate reporting channels on an anonymous or self-identified basis to raise legal or ethical issues or concerns without retaliation, including, without limitation, reports of a violation of this Code. If a Supplier becomes aware of misconduct by a Company employee or by any of the Supplier's business partners' employees in connection with Company business, ConMet expects the Supplier to promptly notify ConMet. Individuals reporting an issue may contact ConMet on an anonymous or self-identified basis through the Amsted Corporate Compliance Helpline at amsted.ethicspoint.com or via the toll-free phone numbers listed on that site. Suppliers must promptly investigate reports of legal or ethical issues or concerns.