

# Statement on Fighting Against Forced Labor and Child Labor in Supply Chains for the Financial Reporting Year 2024

## Introduction

This Statement is made pursuant to Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") with respect to actions taken by the reporting entities during the year ending December 31, 2024. This statement is a joint report covering reporting entities Continental Tire Canada, Inc., and ContiTech Canada, Inc. (together referred to in this statement as "Continental Canada" and "we"), which are part of the Continental Group and belong to the group sectors Tires and ContiTech, respectively.

Continental Tire Canada, Inc., is a business corporation with its main corporate location at 1 Robert Speck Parkway, Suite 900, in Mississauga, Ontario. It is primarily engaged in the sale and distribution of tires that it imports from Continental affiliates outside of Canada (with the most imports by volume coming from Czech Republic, United States, Slovak Republic and Portugal) and related business activities.

ContiTech Canada, Inc., is a business corporation with its main corporate location at 1 Robert Speck Parkway, Suite 900, in Mississauga, Ontario. Its business activities include the sale and distribution of both products that it makes in Canada (such as industrial hoses) and products that it imports from Continental affiliates outside of Canada (such as conveyor belts, steel cable belts, power transmission belts and hoses), with applications in agricultural, automotive, material handling, mining and other industries. The countries from which it imports the most goods by value are the United States and Mexico.

This statement has been prepared in consultation with members of both reporting entities, of our respective group sectors and of the Continental Group. As part of a global company, we have a role to play in efforts to promote respect for human rights in business activities, and we are pleased to provide insight into the actions we have taken to understand, prevent and reduce the risk of forced labor and child labor in our operations and supply chain.

## Corporate profile

Continental consists of Continental Aktiengesellschaft (AG) and its worldwide subsidiaries (collectively, "Continental" or "Continental Group") and is divided into four group sectors: Automotive, Tires, ContiTech and Contract Manufacturing. Since November 1, 2024, these have comprised a total of 15 business areas.

A group sector or business area with overall responsibility for a business, including its results, is classified according to product requirements, market trends, customer groups and distribution channels.

Overall responsibility for managing the company lies with the Executive Board of Continental AG. The Automotive, Tires and ContiTech group sectors are each represented on the Executive Board.

Spanning the group sectors are the group functions of Continental, which are represented by the chairman of the Executive Board, the chief financial officer and the chief HR officer. These functions include Finance and Controlling, Integrity and Law, Compliance, Internal Audit, Quality Management, Human Relations, Sustainability, IT and Group Purchasing

With a 62% share of consolidated sales (PY: 64%), the automotive industry—with the exception of the replacement business—was Continental's most important customer group in fiscal 2024. The Automotive group sector accounted for the lion's share, but the Tires and ContiTech group sectors also generated significant sales figures in this market segment.

The second-biggest market segment for Continental was the global replacement-tire business for passenger cars and commercial vehicles, with 27% of total sales in fiscal 2024 (PY: 25%).

The third-biggest market segment for Continental was the global business with industrial customers and spare parts from the ContiTech group sector with around 9% of total sales (PY: 9%).

## Sustainability management

Sustainability is a driver of innovation for Continental during the current transformation of mobility and industry and is thus firmly anchored in its corporate strategy in the cornerstone of "turning change into opportunity." Sustainability is also a key component in Continental's vision of "CREATING VALUE FOR A BETTER TOMORROW."

In Continental's sustainability ambition, Continental describes how it wants to shape this transformation in the relevant topic areas with respect to sustainability in order to reduce negative impacts and strengthen positive effects, seize transformation opportunities and mitigate transformation risks. Along with the relevant guidelines, this sustainability ambition constitutes the framework for existing management approaches, strategies, programs, processes and targets, as well as their further development. In our four focus areas of sustainability, we are committed to strong, visionary ambitions, which we want to achieve by 2050 at the latest, together with our partners along the value chain: .

- › 100% carbon neutrality,
- › 100% emission-free mobility and industries,
- › 100% circular economy, and

› 100% responsible value chain.

The entire ambition can be found at [www.continental-sustainability.com](http://www.continental-sustainability.com).


Within the Executive Board, the Executive Board member for Group Human Relations (director of Labor Relations) and Group Sustainability is responsible for sustainability. Sustainability management within the Continental Group is regulated by a dedicated internal sustainability policy.

The Group Sustainability group function is further supplemented by sustainability functions in the group sectors as well as coordinators in several business areas and countries. The sustainability functions in the group sectors and in the Continental Group were further expanded and strengthened over the course of 2024.

The Sustainability Steering Committee of the Continental Group is responsible for assessing cross-functional issues, weighing up opportunities and risks and discussing relevant Executive Board decisions in advance. In fiscal year 2024, it consisted of the entire Executive Board, Group Sustainability and other functions at group and group sector level. The committee is chaired by the Executive Board member for Group Human Relations (director of Labor Relations) and Group Sustainability and managed by the head of the Group Sustainability group function. Our group sectors, Tires and ContiTech, also have their own interdepartmental sustainability committees, which are coordinated by the relevant sustainability functions.

## Policies in relation to fighting child labor, forced labor & modern slavery in own operations and in supply chains

Continental operates in complex global value chains that are exposed to a variety of risks associated with the violation of protected rights. Risks within this context are always related to the potential negative impact on people and the environment.

Continental has therefore defined and published its commitments toward a responsible value chain (hereinafter Responsible Value Chain Commitments, "RVC Commitments" for short) in the areas of labor standards, occupational safety and health, security practices, environment and land rights:  RVC Commitments. We have adopted the RVC Commitments as part of the Continental Group. Three of our RVC Commitments focus on rejecting child labor and forced labor and fostering respect for human rights throughout the value chain. These commitments apply to our own operations with Continental Canada and in particular to our direct suppliers. More specifically:

**No child labor.** Continental firmly rejects any form of child labor and specifically respects the standards of the International Labor Organization. Continental does not employ people under the age of 15 or under the age at which compulsory schooling ends or under the applicable country's minimum age for employment, whichever is greatest. Furthermore, young workers under the age of 18 need to be treated with special diligence and should not perform work that is likely to jeopardize their health, safety, and/or development.

**No forced labor & modern slavery:** Continental firmly rejects any form of forced labor, modern slavery, debt bondage, trafficking, or any other form of labor not conducted voluntarily or non-compliant with the International Labor Organization's standards. This includes any form of oppression in the vicinity of the workplace, be it economically or of any other kind. Workers must be provided with documented employment terms or an offer of employment in a language the person should be able to understand. Migrant workers need to be treated with special diligence and shall receive the relevant work-related information prior to their departure from their country of origin and must always have access and full control over their identity or immigration documents.

**Supply Chain.** Continental collaborates with its business partners to foster respecting adequate standards throughout the value chain. Continental expects its suppliers to respect human and environmental rights as referenced in the RVC Commitments and applicable laws. Furthermore, Continental's suppliers are required to implement adequate due diligence processes. These are dedicated to identify, prevent, and mitigate risks of negative impacts on human and environmental rights in their operations and supply chains, including appropriate grievance mechanisms and reporting. Continental is committed to support its business partners and especially its suppliers, e.g., through but not limited to adequate monitoring systems, corrective action plans, and training.

These commitments address the defined risk categories and formulate what is expected of Continental's business units and employees globally, as well as of its direct suppliers. On top of this, Continental has anchored further prevention measures in its own business units and with respect to direct suppliers. Within Continental's responsible value chain due diligence system (RVCDDS), our Code of Conduct defines the fundamental requirements for our employees, while the Business Partner Code of Conduct defines the fundamental requirements for our suppliers and their suppliers with regard to human rights, working conditions, environmental protection, conflict minerals and anti-corruption. The Business Partner Code of Conduct is updated regularly, most recently in fiscal 2024, to reflect changes or adjustments to relevant legislation. For suppliers of natural rubber, our sourcing policy for sustainable natural rubber additionally applies.

## Management system

Continental has established a comprehensive management system to ensure our RVC Commitments with regard to human and environmental rights, including our rejection of child labor, forced labor and modern slavery. This system enables us to identify, address and mitigate associated risks within our own business operations and our supply chain.

Within the management system, responsibilities (including the appointment of a human rights officer for Continental), rules and processes are clearly defined, including risk mitigation measures and control mechanisms. The management system will continue to evolve as the dynamic economic, social and environmental conditions develop further.

Continental has established a system that ensures a controlled escalation through hierarchy, a so-called “three lines of defense” model. In this model, principles and processes cover the functional areas of:

- › Strategy development and implementation
- › Management of regulatory requirements
- › Risk management
- › Incident management (including whistleblower system)
- › Training
- › System monitoring
- › Reporting

The internal responsibilities are defined within the framework of a corporate policy (Group Policy Responsible Value Chain). This policy defines the areas of responsibility of the Executive Board, the business areas, Continental’s human rights officer and relevant functions, and represents the binding framework for the management system to ensure due diligence in a responsible value chain. It includes due diligence within our own business operations, for direct suppliers and in relation to indirect suppliers. The persons relevant for implementation receive general, position-related and risk-specific training. The Executive Board of Continental AG is informed at least once a year by the human rights officer on the current status, effectiveness, appropriateness as well as on measures for improvement and potential advancement of the management system. Suitable improvements to the management system as a whole and to selected elements thereof are defined on this basis. The management system is part of Continental’s overarching risk, compliance, and control system.

## Risk management and risk analysis

Continental operates in complex global value chains in which a variety of risks relating to infringements of protected rights may arise. In this context, a risk is always related to a potential negative impact on humans and the environment.

The main goal of risk management is the mitigation of these risks. Continental has therefore set up a specific risk management within its management system, which includes appropriate, regular risk analyses in order to determine the human rights and environmental risks in our own business operations and with regard to direct suppliers. As part of the risk analysis, Continental uses dedicated risk categories identified in a multi-stage process, evaluated, weighted and prioritized - especially based on the requirements of the German Supply Chain Act and other relevant legal requirements. In gross terms, without taking existing preventive measures into account, all risk categories are considered as relevant for our own business operations and for the supply chain in relation to direct suppliers.

The defined risk categories refer to the risks of potential violations of protected rights in relation to child labor and forced labor among others.

The risk analysis of our own business operations in Canada and of the supply chain in relation to direct suppliers follows a systematic and standardized method in order to ensure comparability and take special organizational features into account on an equal basis. In particular, factors such as business models, ability to intervene, contribution and probability of occurrence as well as severity are

taken into account. Along defined steps, the relevant risks are identified, assessed, weighted and prioritized. Not only are the gross risks taken into consideration, but also the existing preventive measures and the net risks derived from them. Thanks to extensive preventive measures, the net risks are significantly lower than the gross risks. The latter arise from the global footprint of the business activities and supply chains, the broad range of the product portfolio and the various business models and value chain levels. Prioritized risks are then analyzed and evaluated in greater detail in order to derive targeted priority prevention measures.

Based on the risk analysis carried out individually in all relevant companies in fiscal 2024 and in coordination with the respective central functions, the two risk categories equal treatment / anti-discrimination and working conditions (including working hours) were formally prioritized for our own business operations, and three risk categories equal treatment / anti-discrimination, no forced labor & modern slavery, and environmental impacts were formally prioritized for the supply chain in relation to direct supplier. An analysis of risks in relation to indirect suppliers is carried out on an ad hoc basis in cases of substantiated knowledge. Regardless of the prioritization, all risk categories are part of the risk management.

## Preventive measures

As a central prevention measure at the group level, Continental has adopted its [RVC Commitments](#) and communicated them publicly. These address the defined risk categories, which were confirmed as part of the risk analysis, and the associated expectations regarding our own business operations and employees, direct suppliers, and along the supply chain. In addition, further group-wide prevention measures were anchored in our own business operations and towards direct suppliers.

The group-wide prevention measures apply to all Continental companies, including Continental Canada, are the subject of the annual system monitoring and include in particular:

- › The integration of the management system into the essential corporate control processes and frameworks.
- › The [Policy Statement of Continental AG](#) on compliance with human rights and environmental due diligence obligations in supply chains 2024;
- › The [RVC Commitments](#), which explicitly include our rejection of child labor and forced labor within our human rights and environmental commitments;
- › The [Continental Code of Conduct](#), which includes, among other things, explicit rejection of any form of child labor or forced labor and the human rights and environmental-related expectations that we set for our employees;
- › The [Continental Business Partner Code of Conduct](#), which includes, among other things, the prohibition of child labor and forced labor and any forms of modern slavery as part of the human rights and environmental expectations that we place on our suppliers and require them to pass down to their own suppliers and subcontractors; and
- › General and topic-specific training on the management system.

In addition, specific prevention measures have been implemented in our own business operations and in relation to the supply chain. These measures are improved on an ongoing basis, particularly

based on the risk analysis. They include, among other things, environmental and occupational health and safety systems for our own business operations, appropriate procurement strategies and practices, contractual agreements and control mechanisms, as well as training measures in relation to the supply chain. Furthermore, membership in relevant associations and platforms, participation in multi-stakeholder dialogue formats as well as initiatives and industry dialogues are also part of the actively pursued prevention measures.

In the case of substantiated and verified knowledge of risks from direct or indirect suppliers, appropriate preventive measures are agreed and tracked.

The implementation of the management system also includes risk-based controls with regard to the preventive measures taken.

## Corrective measures

If we discover potential adverse human rights allegations, we will investigate them and, if substantiated, pursue corrective measures, engaging and cooperating with affected stakeholders where appropriate. Continental's management system defines the framework for taking corrective measures within its own business operations worldwide, including Canada, and in relation to direct suppliers and, if necessary, indirect suppliers. Corrective measures are implemented promptly and appropriately in the event of violations within our own business operations. The corrective measures relating to direct suppliers follow a duty of care and are aimed at rectifying the violation. If a violation cannot be rectified immediately, appropriate action plans are drawn up to end the violation or at least reduce it appropriately with respect to direct suppliers. Corrective measures relating to indirect suppliers also follow a duty of care. As a last resort, we reserve the right to terminate the relevant business relationships in an appropriate manner.

## Responsible Sourcing

Responsible sourcing is the responsibility of the relevant purchasing organizations, which are established at Continental by group sector, product group and country, for example. A corporate purchasing network regularly deals with responsible sourcing topics as well.

Sustainability aspects are taken into consideration at various points in supplier management. On the basis of various criteria, for example, selected suppliers are assessed with the help of self-assessment questionnaires and evaluations through sustainability platforms, which include questions regarding the management of human rights and working conditions, including child labor and forced labor, and the submission of supporting documentation. In addition to receiving assessment reports generated through this process, selective local audits or other audit activities—such as in relation to the existence of suppliers' own management systems—are also carried out.

As of December 31, 2024, in total 1,534 valid supplier self-assessment questionnaires and results were available via the two sustainability platforms, EcoVadis and NQC.


## Communication and Training

Continental communicates its management approaches on labor standards and workers in the value chain through diverse channels. This includes Continental's website, the published annual report and internal communication platforms which host trainings as well as the internal frameworks. In addition, posters and on-site training courses make relevant information available to employees who do not have access to the IT infrastructure. Furthermore, through integration into the onboarding process, new employees are also familiarized with Continental's standards right from the start.

Furthermore, stakeholders involved in implementing the management approaches have clearly defined roles within Continental's RVCDDS and are trained on the associated responsibilities to enable effective collaboration and execution of the management approaches.

Training initiatives for suppliers are also carried out to further promote shared responsibility along the entire value chain. In addition, direct suppliers are requested to sign the Business Partner Code of Conduct. The communication is thus aimed at affected stakeholders as well as stakeholders involved in the implementation.

## Complaints procedure

Continental's existing group-wide complaints procedure, the Continental Integrity Hotline, has been supplemented within the framework of the legal requirements of the German Supply Chain Act and is available to Continental employees and external parties. The Continental Integrity Hotline is open, among other things, for complaints regarding potential violations of human rights and environmental rights and lists these topics. The Continental Integrity Hotline and Integrity Platform are both publicly available and can be accessed, for example, via Continental's  website. The legally required rules of procedure are also stored there. Reports can be made both in writing and by telephone. Availability by telephone is ensured through national and international telephone numbers. Both options are available 24/7. The instructions for using the Integrity Platform can be found under the keyword "Step-by-step reporting" and are available in multiple languages. Instructions for using the telephone hotline are also available in multiple languages.

Continental uses the services of EQS Group AG, one of the leading providers in the area of IT-supported reporting channels, for both complaint channels. This secure and anonymous whistleblowing system protects the whistleblower through an encrypted reporting channel. All informants can remain anonymous if they wish. Confidentiality is ensured within the framework of the legal provisions in the case of non-anonymous reporting. The persons entrusted with carrying out the complaint procedure are obliged to maintain confidentiality within the framework of the legal requirements and act independently. The effectiveness of the Continental Integrity Hotline and Integrity Platform with regard to relevant reports is assessed at least once a year as part of the review of the management system. Business partners, the respective employees, other stakeholders and rights holders in general are encouraged by the Business Partner Code of Conduct

to report complaints via the Continental Integrity Hotline and Integrity Platform. The Business Partner Code of Conduct contains a link to the Continental Integrity Hotline and Integrity Platform and is publicly accessible online. Continental protects persons who provide information and does not tolerate any retaliatory measures that could be directed against these persons. The procedural steps are explained in the rules of procedure. Receipt of a complaint will be confirmed and a discussion of the matter with the whistleblower on matters relating to the RVC Commitments is planned. Feedback is sent no later than three months after receipt of the notification has been confirmed.

In addition to the complaints procedure, further sources are used to investigate suspected cases of potential violations of protection rights and, if necessary, to implement preventative and corrective measures.

## Reviews of effectiveness

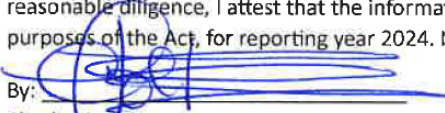
As part of the annual system monitoring, the human rights officer of Continental reviews the appropriateness and effectiveness of the

management system. This review is based, among other things, on the relevant assessments within the business areas as well as on the assessment of the individual elements of the system by the human rights officer. The management system is designed as a learning system that is developed on an ongoing basis. This also includes experience from membership in relevant associations and platforms, as well as participation in multi-stakeholder dialogue formats.


## Documentation, reporting and dialogue

The implementation of the management system is coordinated with relevant decision-makers, communicated, internally documented, and archived. External reporting on a responsible value chain and the implementation of our due diligence obligations is part of sustainability reporting and other reporting formats including this one.

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 **Continental Tire Canada, Inc.** 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 year 2024. I have authority to bind **Continental Tire Canada, Inc.**

By:   
Charles J. Holtmann  
Director  
May 29, 2025

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 **ContiTech Canada, Inc.** 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 year 2024. I have authority to bind **ContiTech Canada, Inc.**

By:   
Guy L. Enta  
Director  
May 29, 2025

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