

Forced Labour in Canadian Supply Chains 2024 Report

About this Report

This report constitutes the first report prepared by Integrity Tool & Mold Inc., pursuant to Canada's new *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and represents the 2024 financial year.

It sets out the steps taken to prevent and reduce the risk that forced or child labour is used in our business operations or at any step throughout our supply chain.

Integrity's Business

Structure

Integrity was established in 2000 and is headquartered in Oldcastle (Windsor), Ontario, Canada. Globally, Integrity has 12 facilities in Canada, USA, Mexico and Italy and employs over 900 team members. Our 12 facilities are designed to collaborate with one another, as well as work independently.

Activities

Integrity is a plastic injection solutions provider, specializing in plastic injection mold manufacturing predominantly for the automotive industry. The volume and advancement of Integrity's machines and technology means we can customize and handle the most complicated molding projects.

Integrity is a global leader in the tool and mold industry, and has achieved this success through professional and intuitive project management, highly-skilled design services, advanced data analytics, and world-class tradespeople.

We offer a complete end-to-end service to our customers: from Feasibility, through Product Design, Mold Flow, Mold Design, Mold Manufacture, to Validation. Additionally, we also offer Machining, In-House Emergency Repair, Off-Site Tool Launch Support, Transportation, and Molding Support for Tier 2 and 3.



Supply Chains

Our global presence allows us to serve customers from around the world. We also work with suppliers, vendors, and other partners from across the globe who share our commitment to responsibility, both socially and environmentally.

Our main vendors supply a wide range of goods and services that allow us to manufacture our molds, including but not limited to:

- Mold components
- Material for molds, including P-20 steel, 1020, aluminum, etc.
- CNC tooling and supplies
- Carbon
- Computer hardware

Policies

Integrity is committed to preventing forced and child labour in its business practices and through its supply chain. This is codified in our relevant policies and procedures.

Human Rights Policy

Integrity is committed to respecting and promoting human rights in all aspects of its operations, including within its own facilities and throughout its supply chain. We recognize that human rights are fundamental principles that must be upheld and respected at all times.

Our Human Rights Policy applies to all employees including leaders, managers, temporary employees, apprentices, students and subcontractors. There is also an expectation that any vendors or suppliers we enter into business with also apply the principles of our Human Rights Policy, including respect for human dignity, non-discrimination, labour rights, child labour and forced labour, health and safety, and supply chain responsibility.

Code of Ethics

Integrity believes that everything we do should be measured against the highest standards of ethical conduct. Integrity is not just our name – it's a core value of every team member in every department at every Integrity location. Our Code of Ethics is a statement of our shared core values that help us operate openly, honestly, and ethically. It codifies our continuing commitment to ethical conduct in all that we do.



Integrity's Code applies to everyone in our company at all locations, including employees, leaders, managers, and executives. We expect third parties, including our customers, vendors and suppliers, to act in a manner consistent with the principles of our Code when conducting business with Integrity, including our core values of honesty, transparency, accountability, respect, fairness and sustainability.

Vendor Commitment to Ethical Labour Practices

A crucial part of Integrity's commitment to upholding the highest standards of ethical conduct in all aspects of our business operations is ensuring that forced labor and child labor are strictly prohibited within our supply chain. To reinforce this, we have developed a vendor questionnaire that will allow us to request our vendors' formal acknowledgment and compliance with our ethical labor policies, including the prohibition of forced labour, the prohibition of child labour, and compliance with local and international labour laws.

The Commitment to Ethical Labour Practices questionnaire is dispersed to all existing vendors, as well as to all vendors looking to initialize purchasing agreements with Integrity. In addition to completing the questionnaire, our vendors are required to submit supporting documentation where applicable highlighting their commitments.

Protections against Retaliation

Integrity has established whistleblower protections into our relevant policies that prohibit retaliation of any form against someone who reports, in good faith, a violation of our policies or cooperates in a subsequent investigation. Good faith does not mean that the individual has to be right about a concern, but that it is honestly believed to be true.

Further, Integrity encourages anyone who feels they have been retaliated against, or if they suspect it against someone else, to report it through one of the internal resources. Any employee found to have engaged in retaliation will be subject to appropriate disciplinary action. Integrity reserves the right to cease business operations with any vendor found to have engaged in retaliatory practices.

Due Diligence Process

Integrity demonstrates its commitment to fighting forced and child labour practices through our due diligence measures aimed at proactively identifying, addressing, and mitigating potential human rights matters.

We use our Commitment to Ethical Labour Practices questionnaire to screen our suppliers and vendors for human rights issues relating to child and forced labour. Further, our standard supplier contract used



for the procurement of goods and services includes requirements for compliance with applicable laws and relevant Integrity policies. We reserve the right to verify compliance with our policies, including the Human Rights Policy and Code of Ethics. In addition, we reserve the right to cease business dealings and/or take necessary action in the event of noncompliance.

We will conduct annual audits and risk assessments of our operations, including of our supplier's reported practices, to ensure that all operations remain aligned with our relevant policies and principles prohibiting the use of child and forced labour. We will also undergo periodic risk assessments to determine risks specific to child and forced labour within our operations and supply chains.

Risk Assessment and Management

We have conducted a review of the current Integrity policies, procedures, contracts, and partnerships as they relate to identifying, addressing, and prohibiting the use of forced and child labour within our business practices and supply chains. We will continue to conduct on-going periodic reviews and risk assessments as part of our maintained commitment to fighting child and forced labour.

Operations Analysis

We consider there to be a low risk of forced labour or child labour in our direct operations. We have introduced screening measures to ensure that applicants being considered for employment with Integrity meet the *Employment Standards Act* legal minimum age requirement to work in a manufacturing facility. Additionally, we have built-in protections within our payroll system to verify the age of an employee compared to their government-issued Social Insurance Number.

Integrity includes standard orientation and training as part of the onboarding process for new hires. Included in this training package is an Excess Hours Agreement document, which when signed by an employee, allows for Integrity to schedule the employee over 48 hours of work in a week (the *Employment Standards Act* weekly limit). Therefore, this document indicates the employee's voluntary consent to working in excess of the weekly maximum as prescribed by provincial labour laws. In cases where an employee chooses to not sign this agreement, the employee is not scheduled beyond the 48 hour weekly limit.

Supply Chain Analysis

As Integrity procures many goods and services from a broad range of suppliers, both domestically and internationally, we acknowledge a risk that forced and/or child labour may be used in our extended supply chain. We understand the importance of mitigation and management in our purchasing processes, and as such, have developed and implemented our Commitment to Ethical Labour Practices questionnaire.



Integrity's first supply chain analysis highlighted the risk specifically related to ordering from vendors located in China and other countries across the globe that would be at a higher risk of utilizing forced or child labour practices. To mitigate this risk, we will ensure that our global vendors complete the required questionnaire to ensure adherence to ethical labour practices.

Remediation Measures

As Integrity has not yet identified any forced or child labour practices within our business operations or supply chain, we have not had to take any measures to remediate, including the remediation of loss of income to vulnerable families resulting from measures taken to eliminate the use of forced or child labour in our activities or supply chains.

Training

Integrity includes standard orientation and training as part of the onboarding process for new hires. Included in this training package is an Excess Hours Agreement as described in this report. Further, our Human Rights Policy and Code of Ethics are distributed to all new hires at the time of their onboarding for their review and acknowledgement.

As team members are hired or promoted into supervisory positions (i.e. leader, manager or director), they are required to complete supervisory training, which includes sections regarding human rights, ethical conduct, and forced/child labour. Additionally, key stakeholders within our Purchasing team responsible for procurement are being trained on our processes of vendor management, including the Commitment to Ethical Labour Practices questionnaire.

Assessing Effectiveness

As described in this report, Integrity has introduced a number of measures to prevent and reduce the risks associated with child and forced labour within our operations and supply chain. However, no actions have been taken to date to assess the effectiveness of these measures.

Attestation

This report was approved pursuant to subparagraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

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 Integrity Tool & Mold Inc.

A handwritten signature in blue ink, appearing to read 'Paul DiGiovanni', is written over a horizontal line.

Paul DiGiovanni
Team Principal
May 26, 2025

