

## **Supply Chains Act Report (2024)**

LCI Canada Group Inc. (“**LCI Canada**”) and Curt Manufacturing Ltd. (“**Curt**”) have prepared jointly prepared this report (the “**Report**”) (collectively, the “we,” “our,” or “us”) pursuant to section 11 of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). The Report covers the financial year January 1, 2024 – December 31, 2024 (the “**Reporting Period**”).

This Report describes the efforts being taken to promote transparency in our supply chains by outlining the steps taken during the 2024 financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

### **Company Structure, Activities, and Supply Chains**

LCI Canada and Curt are wholly owned subsidiaries of Lippert Components Inc. (“**Lippert**”), a publicly traded company (NYSE: LCII) headquartered in Elkhart, Indiana, USA. Lippert is a leading global manufacturer and supplier of highly engineered products and customized solutions for the RV, marine, automotive, commercial vehicle, and building products industries. Lippert does not carry on business in Canada.<sup>1</sup>

LCI Canada is a wholly owned subsidiary of Lippert and is incorporated pursuant to the laws of Quebec. LCI Canada is located in Granby, QC, Canada and manufactures windows and doors for buses, RVs, boats and other commercial vehicles.

Curt is a wholly owned subsidiary of Lippert and is incorporated pursuant to the laws of British Columbia, Canada. Curt maintains facilities in Edmonton, AB, Canada and Brampton, ON, Canada which operate as distribution centers for our products.

As part of Lippert, we benefit from Lippert’s broad supplier base. Lippert sources raw materials and components from a substantial number of suppliers globally, some of which are acquired by its subsidiaries, including LCI Canada and Curt.

LCI Canada and Curt only import, distribute, or sell a subset of all goods or services that were manufactured using inputs sourced from Lippert’s global supplier base in support of our businesses.

### **Policies and Due Diligence**

#### *Policies*

Lippert takes a global, company-wide approach to its modern slavery compliance, which includes LCI Canada and Curt. Lippert is committed to conducting business in a legal and ethical manner globally and seeks to fully comply with all applicable labor and other laws in all jurisdictions in which we operate. Lippert’s core values inspire us to be honest, ethical, and responsible in all our business practices. Lippert maintains internal and external policies to facilitate global communication and integration of the expectations with respect to child labor, modern slavery in all forms, and human trafficking into Lippert’s procedures and contractual framework.

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<sup>1</sup> Lippert is not an “entity” as defined in the Act and, therefore, is not reporting under the Act.

The policies and procedures discussed in this report, including the Guidelines for Business Conduct, Code of Ethics for Senior Financial Officers, Whistleblower Policy, and the Vendor Compliance Guidelines, apply to all entities in Lippert's organization, including LCI Canada and Curt. Accordingly, we rely on the supply chain processes used by Lippert globally, which assess suppliers.

- **Guidelines for Business Conduct:** Lippert's Guidelines for Business Conduct sets out the expectations of Lippert, including all of its subsidiaries and stakeholders, to comply with all applicable laws. This expectation extends to those laws directed at human rights, working conditions, forced and child labor, and freedom of association.

Lippert reviews the Guidelines for Business Conduct and publishes it on its website and can be accessed [here](#).

- **Whistleblower Policy:** This [policy](#) encourages and enables employees and other stakeholders to report concerns regarding questionable accounting or auditing matters, internal controls, illegal practices, violations of adopted policies of the Company, or violations of any applicable law, including those related to modern slavery and human trafficking, without fear of retaliation. The complaints can be made anonymously and will remain so to the extent possible consistent with the law.
- **Governance Principles:** These principles provide the framework for Lippert's governance, including the oversight of management to monitor compliance with laws and ethics, and the integrity of relationships with customers and suppliers. The Governance Principles set out Lippert's expectation that Directors, officers, and management employees will comply with Guidelines for Business Conduct and also provides a reporting mechanism for concerns to be brought to the non-employee Directors.
- **Vendor Compliance Guidelines:** These guidelines detail the information related to packing, labeling, shipping, and invoicing products. They also include expectations about for compliance with laws against child and forced labor, and human trafficking.
- **Conflict Minerals Policy:** This policy aims to reduce violent conflict in the Democratic Republic of the Congo and certain adjoining countries by providing transparency regarding the use of certain minerals that finance, or benefit armed groups in the region.

#### *Due Diligence and Mitigation of Risks*

- **Supplier Audits:** Lippert has the ability to conduct onsite audits of a portion of its key suppliers each year to monitor compliance with our Supplier Code of Conduct and performance expectations.

Lippert's Human Resources (HR) department conducts reviews of the workforce evaluating voluntary recruitment and employee classifications, including contingent employees, and employees of joint ventures where Lippert is a partner. In addition, Lippert's hiring protocols, used by LCI Canada and CURT, include specific checks and processes in place to reduce the risk of any violations of any applicable laws.

## **HR-Related Audits/Due Diligence**

As part of Lippert, we have benefitted from the implementation of a number of HR audits and/or due diligence programs aimed as the protection of the rights of our employees and compliance with applicable laws including:

- Employee Engagement Surveys – designed to assess the overall employee engagement and satisfaction, identify workplace complaints and issues, and assess employee opinions on a variety of workplace issues ranging from fair treatment, working conditions, and leadership development.
- Health, Safety & Environmental Audits and Inspections.
- Payroll & Compensation Audits.
- Labor & Employment Audits.

## **Participation in industry associations**

Lippert's Sustainability Director participates in a number of associations like Board.Org, RV Industry Association etc. that allows us to benchmark best practices regarding activities to prevent forced/child labor and identify opportunities for continuous improvement.

## **Internal and External Feedback**

- Engagement with key stakeholders, such as investors and customers, through surveys and materiality assessments
- Feedback from risk-based audits, such as our Employee Engagement Surveys and other HR audit programs.
- Feedback received from our Board of Directors and its standing committees.
- Monitoring and analysis of existing and emerging regulatory requirements globally.

## **Potential Risks of Forced Labor or Child Labor in our Operations and Supply Chains**

### *Operations*

We consider the risk of modern slavery occurring within our operations to be low considering our Canadian workforce (including team members with legal work permits) and in-depth policies and procedures that govern our day-to-day operations and employment relationships.

From a geographical risk perspective, our employees are limited to Canada, which has a low prevalence of child and forced labor, low risk of vulnerability to child and forced labor, and fairly robust governmental responses addressing child and forced labor.<sup>2</sup>

At a company-wide level, Lippert prohibits suppliers from using our engaging in any indentured or forced labor, slavery or servitude, human trafficking, or compulsory labor.

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<sup>2</sup> See Walk Free, Global Slavery Index 2023, available here: <https://www.walkfree.org/global-slavery-index/map>.

## *Supply Chains*

As subsidiaries of Lippert, our supply chains directly benefit from the policies and due diligence implemented at the parent level that are designed to assess the compliance of their respective supply chains.

We recognize that the risks of modern slavery are inherent to all supply chains, including ours. However, we rely on the policies of Lippert to identify and reduce these risks.

During the Reporting Period we did not identify and were not made aware of any instances of modern slavery in our operations or supply chains. Accordingly, no steps were required to remediate child or forced labour, or the loss of income associated with remediation efforts.

## **Training**

Our salaried employees receive annual training on the Guidelines for Business Conduct, which includes the expectation of compliance with all applicable laws, rules, and regulations, including those that prohibit forced labor and child labor. This training is also part of the onboarding process for new employees.

In addition, Lippert's Supplier Development, Supplier Quality Management System, and Plant Quality teams provide resources for, and where appropriate, conduct specific training for suppliers as needed.

## **Assessing Effectiveness**

Lippert has certain measures in place to prevent and reduce the risk that forced labor or child labor is used in our business operations and supply chains, as discussed in this Report. Examples of how we, through Lippert, measures effectiveness include (i) conducting annual reviews of Lippert's policies, and (ii) the use of key performance indicators, including the number of cases of forced labor or child labor identified via internal audits and the rate of completion of Guidelines for Business Conduct training.

At a parent company level, there may be consideration of implementing additional processes, where applicable, to assess the effectiveness of the measures taken to prevent and reduce the risks of forced labor and child labor in our supply chains and operations.

## **Approvals and Attestations**

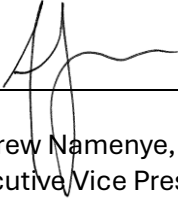
This Report was approved by the Board of Directors of LCI Canada Group, Inc. pursuant to section 11(4)(b)(i) of the Act.



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Andrew Namenye, I have the authority to bind LCI Canada Group, Inc.  
Executive Vice President, Chief Legal Officer, Director  
May 19, 2025

This Report was approved by the Board of Directors of Curt Manufacturing Ltd. pursuant to section 11(4)(b)(i) of the Act.

A handwritten signature in black ink, appearing to read 'Andrew Namenye', is written over a horizontal line. The signature is stylized and somewhat cursive.

Andrew Namenye, I have the authority to bind Curt Manufacturing Ltd.  
Executive Vice President, Chief Legal Officer, Director  
May 19, 2025