



**Fighting Against  
Forced Labour and  
Child Labour  
in Supply Chains Act Report  
– Fiscal Year 2024 –**

## **A. Introduction**

This report was prepared by Maple Automotive Corporation (“MAC”, “Company”, “we”, “us”), in accordance with the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

MAC is committed to maintaining the highest standards of ethical and responsible conduct in all aspects of our operations. We recognize the vital importance of upholding human rights and are dedicated to combating forced and child labour within our business activities and supply chains.

This report outlines the actions taken by MAC during the most recent financial year—April 1, 2024, to March 31, 2025 (the “reporting period”)—to prevent and mitigate the risk of forced and child labour at any stage in our supply chains, in alignment with the requirements of the Act.

## **B. Our Company – Structure, Activities, and Supply Chain**

Maple Automotive Corporation is a Canadian-based automotive supplier with over two decades of experience. We are a subsidiary of Toyota Tsusho America and affiliated with Toyota Tsusho Corporation, a global trading company headquartered in Nagoya, Japan.

Operating out of two Ontario facilities, MAC specializes in the assembly and delivery of tire and wheel components. Our supply chain is broad and includes suppliers primarily located across North America and Asia.

## **C. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

### **1. Global Code of Conduct and Ethics**

MAC’s Global Code of Conduct and Ethics (“COCE”) reflects our corporate philosophy: “Living and prospering together with people, society, and the globe, we aim to be a value-generating corporation that contributes to a prosperous society.”

The COCE affirms our commitment to human rights and expressly prohibits human rights abuses, including forced labour, child labour, and all forms of harassment or discrimination. We are committed to fostering a workplace that is free from bias based on gender, age, race, ethnicity, religion, disability, sexual orientation, political views, or any other status.

All employees are required to comply with the COCE, and MAC has established channels for promptly reporting any violations.

### **2. Statement of Commitment**

During the reporting year, MAC’s president issued a formal Statement of Commitment, reiterating the Company’s stance against forced and child labour. In support of this pledge, we reviewed our corporate structure, operations, and supply chain to assess potential risks and implemented key policies, including our Ethical Trading Policy and the Supplier Sustainability Code of Conduct. The Statement is displayed across all MAC locations.

### 3. Ethical Trading Policy

MAC recognizes that our business practices impact stakeholders and communities. To ensure we conduct our operations with integrity, we implemented an Ethical Trading Policy (“ETP”) during the reporting period, requiring all employees to acknowledge and follow its principles.

The ETP outlines our responsibilities to employees, customers, suppliers, and the wider community. It emphasizes supply chain monitoring and our commitment to environmental protection, health and safety, and socially responsible practices. We will not conduct business with entities that fail to adhere to sound labour, environmental, or community practices.

The policy establishes standards prohibiting forced and child labour, wage deductions for discipline, excessive working hours, and workplace discrimination. It also promotes safe working conditions and fair employment.

### 4. Illegal Labour Policy

During the reporting period, our Illegal Labour Policy (“ILP”) sets out MAC’s zero-tolerance stance on illegal labour practices such as child labour, forced labour, human trafficking, and slavery. All employees are required to understand and uphold the ILP.

The ILP mandates that MAC will not knowingly engage with any entity in breach of relevant labour laws or ethical standards. Our personnel are responsible for monitoring both internal practices and those of our suppliers. Any violations trigger swift corrective action in accordance with the ILP.

### 5. Supplier Sustainability Code of Conduct

MAC updated its Supplier Sustainability Code of Conduct (“SSCOC”) to communicate its core expectations regarding labour and human rights, health and safety, environmental stewardship, compliance, and ethical business conduct. The SSCOC is published in two languages.

The SSCOC aligns with key international standards, including the Universal Declaration of Human Rights, ILO Conventions, and Organization for Economic Co-operation and Development Due Diligence Guidance for supply chains in high-risk areas. It strictly prohibits the use of forced or child labour.

MAC expects our suppliers to:

- Respect the fundamental labour standards set forth in the conventions of the ILO with regard to the abolition of forced labour, child labour and slavery.
- Not use any form of forced labour; this includes prison labour, bonded labour, indentured labour, slave labour, and/or labour derived from human trafficking.
- Be responsible for payment of all recruitment fees and expenses and not charge any such fees to their workers.

- Maintain workplaces free from physical abuse, sexual harassment, threats, intimidation, and verbal or psychological harassment.
- Commit to providing and maintaining a safe and healthy workplace for visitors and workers.
- Respect the right to freely associate, organize, and bargain collectively in accordance with local laws and ILO conventions.

The SSCOC also states that MAC can verify supplier compliance with the SSCOC, including, through site visits and inspections. The SSCOC further states that if a supplier fails to comply with any aspect of the SSCOC, immediate notice of violation shall be provided, and suppliers will be subject to corrective action and potentially termination of the business relationship.

The SSCOC requires suppliers to immediately report any instances of illegal or unethical behavior or breaches of the SSCOC and to prohibit retaliation against any person for reporting, in good faith, contraventions of the SSCOC.

#### **D. Due Diligence Processes**

MAC carries out due diligence on its suppliers to ensure compliance with applicable regulations and to manage third-party risks. We utilize a risk-based approach, focusing on regions and materials with a higher prevalence of forced and child labour as identified in public data.

This diligence includes Tier 1 and sub-tier suppliers. Depending on the risk level, suppliers may be required to map their supply chains and provide documentation to ensure traceability. This targeted strategy helps MAC effectively direct its compliance efforts.

#### **E. Assessing and Managing Forced Labour and Child Labour Risks**

MAC understands that forced and child labour risks can arise at any point in the supply chain, influenced by factors such as geography, product type, or material origin.

We are actively identifying key areas of risk within our supply chains to guide our due diligence and compliance strategies. Suppliers are aware they may be subject to increased scrutiny and are expected to take steps to prevent the use of forced or child labour in their own operations and networks.

During the reporting period, MAC began updating its General Terms and Conditions—applicable to all procurement contracts—to include specific clauses prohibiting the use of forced or child labour and referencing the SSCOC.

#### **F. Training**

MAC employees complete annual training on the COCE, which includes modules on regulatory compliance and human rights. Completion of a knowledge assessment is required to ensure comprehension.

## **G. Remediation Measures**

During the reporting period, MAC did not identify any instances or significant risks of forced labour or child labour in its operations or supply chains that would require remediation measures. The Company accordingly did not undertake any measures to remediate the loss of income to the most vulnerable families resulting from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains. MAC is committed to working with its suppliers to assess and monitor risks and to respond appropriately to remediate the impact in accordance with MAC's policies and processes.

## **H. Assessing effectiveness**

Throughout the reporting period, MAC implemented and enhanced several initiatives aimed at minimizing the risk of forced and child labour in our operations and supply chains. We are in the process of establishing frameworks to evaluate the effectiveness of these efforts on an annual basis. At this stage, no formal assessments have been conducted.

## **I. Approval and Attestation**

This report was approved by the Maple Automotive Corporation's board of directors on May 20, 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 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.



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Grant Town

Director

I have the authority to bind Maple Automotive Corporation.

Date: May 21, 2025