



## ***Fighting Against Forced Labour and Child Labour in Supply Chains Act***

### **Disclosure Report**

#### **I. Disclosing Entity**

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This disclosure report is submitted by SCHULER INCORPORATED (hereinafter referred to as “Schuler Inc.”).

#### **II. About this Disclosure Report**

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This disclosure report is submitted in accordance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Bill S-211) and guidance issued by Public Safety Canada.

#### **III. Introduction**

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Schuler Inc. and its affiliated companies are committed to integrity, respect, and fair dealing in their business activities. This commitment includes the fair and equitable treatment of employees, business partners (and their employees), members of the community, and all other stakeholders with whom we engage. Schuler does not tolerate forced labour, child labour, or any other human rights abuses in any its business activities. Schuler Inc. is a member of the ANDRITZ Group.

#### **IV. Business Structure, Activities, and Supply Chains**

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Schuler Inc. is incorporated in Ohio and headquartered in Canton, Michigan. Offerings include metal forming equipment sales, after-sales-service and spare parts, field service repairs, rebuilding and modernization, digital services, and hydroforming part production. ANDRITZ Schuler GmbH, a German company headquartered in Göppingen, Baden-Württemberg, Germany, is Schuler Inc.’s parent company, and a member of the ANDRITZ Group of companies. The ANDRITZ Schuler Group operates in the field of forming technology and is the world’s largest manufacturer of presses, press auxiliary and other metal forming equipment. The equipment is used for forming processes in the Automotive, Tiers, Appliances, Minting, Railway, Aerospace and Defense industry. ANDRITZ Schuler Group’s main manufacturing facilities are in Germany, Brazil and China. ANDRITZ Schuler Group is affiliated with and has offices and facilities globally.

Schuler Inc. maintains a global supply chain that includes:

- Suppliers of direct materials (e.g., automation components, bearing housing, cable and wire, castings, pumps, valves, couplings, fastening material, forgings, filter technology, hoses, gaskets, plates steel products, etc.), manufacturing materials, and packaging materials. These materials are procured from International affiliated ANDRITZ entities as well as non-affiliated third-party vendors and suppliers located around the world including the United States, Canada, Poland, Germany, Italy, Brazil, France, Spain, Slovenia and Mexico.
- Suppliers of indirect goods and services including professional services, facilities, office supplies, and sales and marketing services.
- Customers located primarily in the United States and Canada with some in Mexico.

#### **V. Policies Related to Forced Labour and Child Labour**

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Schuler Inc. uses ANDRITZ's *Code of Conduct and Ethics*, which requires all personnel to adhere to the highest levels of ethics and integrity in all of their business activities. This includes compliance with applicable laws and legal standards, and the responsibility to maintain a safe, healthy, and respectful work environment. A fundamental principal of the *Code of Conduct and Ethics* is that personnel treat each other with respect, dignity, and fairness – and to protect human rights in their daily business activities. Employees receive compliance training during their onboarding and periodic communications explaining their responsibility to act ethically and in compliance with the law.

The company's commitment to protecting human rights is further demonstrated in the ANDRITZ *Supplier Code of Conduct and Ethics Policy* and *Supplier Code of Conduct and Ethics*, which Schuler Inc. requires all new suppliers to agree to. The *Supplier Code of Conduct and Ethics*, which addresses a range of topics including human rights and fair working conditions, sets forth the minimum requirements for any third-party vendor or supplier engaged to transact business with ANDRITZ, and its affiliated entities, like Schuler. For example, the Code specifically requires vendors or suppliers to refrain from engaging in, or benefiting from, any form of forced, involuntary or child labour. These vendors and suppliers are also required to acknowledge and adhere to the principles articulated in the *Supplier Code of Conduct and Ethics*. This includes the commitment that these vendors or suppliers request the same, or similar, compliance standards from their business partners.

To build a more transparent, safe, and ethical workplace, Schuler Inc. uses a highly secure whistleblowing system known as "Speak Up!". This online reporting tool allows employees and third-party business partners to report instances of actual or suspected misconduct to Group Compliance in a safe and confidential manner. The Speak Up! reporting tool can be accessed online and by QR code.

## **VI. Due Diligence Process Related to Forced Labour and Child Labour**

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Vendors and suppliers are screened through a prequalification and onboarding process. This process includes the completion and evaluation of a detailed *Prequalification Questionnaire*. The questionnaire addresses a range of topics including human rights and fair working conditions. In some instances, there will also be an on-site audit of the vendor or supplier if needed. The results of the vendor and supplier evaluation will determine whether the potential business partner may be engaged and/or whether any additional controls are needed to mitigate any risk.

## **VII. Risk of Forced Labour and Child Labour**

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Schuler Inc. evaluates supplier compliance risk, through its supplier quality assurance department, which may from time to time, conduct random technical checks and audits. In addition, the information collected from its *Prequalification Questionnaire* and onboarding process is used to identify risks in its supply chain.

## **VIII. Remediation**

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Schuler Inc. has not identified any instances of forced labour or child labour in its business activities or supply chains. Accordingly, Schuler Inc. has not had cause to implement any forced labour or child labour related remediation measures.



## IX. Training

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ANDRITZ provides training on the ANDRITZ *Code of Conduct and Ethics*, which all Schuler Inc. employees are required to complete. This training module addresses human rights issues and the importance of treating employees and third-party business partners fairly and with integrity and respect. ANDRITZ tracks completion of this training on a regular basis.

ANDRITZ has also developed a training module on the *Supplier Code of Conduct and Ethics*, which is available to employees and third-party vendors and suppliers on a voluntary basis.

## X. Assessing Effectiveness

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Schuler Inc. places responsible business conduct into policies and management systems, as well as screening potential suppliers for possible risks and adverse impacts on operations. Schuler Inc. works with suppliers to measure the effectiveness of their actions to address ethical considerations, and if necessary, to address forced labour and child labour, including tracking relevant and applicable performance indicators. In addition, Schuler tracks the number of reports alleging supplier-related misconduct (including the use of forced and child labour) through “Speak Up!” and other internal reporting tools.

## XI. Approval

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This report has been approved by the Board of Directors of **Schuler Incorporated** in accordance with section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”).

In accordance with the requirements of the Act, and in particular section 11 thereof, I, as an officer of the Company, attest that I have reviewed the information contained in the report for the entity 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 legal authority to bind the entity.

Dated: 1st May 2025

Signature:  \_\_\_\_\_

Full Name: Kevin McAllister

Title: President, Schuler Incorporated