

BILL S-211

An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains.

Modern Anti-Slavery Statement for the Financial Year ended 2025

This statement is made pursuant to Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). This statement outlines the approach and initiatives by Surrette Battery Company Ltd. to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing April 1, 2024, and ending March 31, 2025.

Structure

Surrette Battery Company Ltd. was established as a Canadian battery manufacturer in 1959 with its head office and manufacturing facility at 58 Lisgar St. Springhill, Nova Scotia, Canada. Which is a Canadian Controlled Private Corporation with approximately 100 full time employees.

Supply Chain

- Our supply chain is heavily focused in Canada and the US
- We do have supply chain partners in Europe, China and Vietnam.
- Our products are packaged in the US, Canada, China, Vietnam.

Steps Taken to Reduce Risks of Forced Labour in Supply Chain

- Offshore production of goods for export and domestic markets can carry some risk. We mitigate this through our robust publicly posted policies for Conflict Minerals (Since 2019), Anti-Slavery and Human Trafficking (Since 2022) and our Supplier Code of Conduct (Since 2024) as well as our own internal code of Ethics (since 2024). These policies are posted for public review at <https://www.rollsbattery.com/resources/>. All policies include reporting mechanisms (anonymously where appropriate) and potential consequences for breaching them.

Actions Taken

- No forced or child labour was detected in our supply chain assessment and as such no actions were required under Bill S-211 or our applicable forced labour policies.

Risk Assessment

- New Suppliers from risk areas typically have an onsite factory inspection to ensure acceptable working conditions, control of products and processes.
- All existing suppliers from geographical risk areas have experienced onsite factory inspections.
- Factory inspections were performed at 2 key supplier locations during FY 2025.

Remediation

- Since no forced labour was detected during the annual review of our supply chain. No remediation was necessary. However, should a violation be detected, Surrette Battery Company Ltd. remains committed to appropriate remediation, in addition to appropriate consequences for suppliers who are found in violation of our policies.

Training

- The primary Employees responsible for procurement of materials for the manufacture of goods, or goods for resale are trained in Supply Chain Management.
- We are considering specific training in regard to MAS and Bill S211 for all staff involved in procurement.

Effectiveness Assessment

- Effectiveness is determined by comparing the number of reported incidents against the affected suppliers during the annual review of our ASL per ISO 9001:2015 which occurs a minimum of annually.

Attestation

- In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report. Based on my knowledge, having exercised reasonable diligence, I attest that the information is true, accurate and complete in all material respects for the purposes of the Act during the reporting period listed above.

Signed,

Virginia Archibald, CPA, CA
CFO
May 30, 2025