

THE FLEX|N|GATE GROUP IN CANADA



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

2024

REPORT ON ACTIONS
TAKEN TO PREVENT AND
REDUCE THE RISKS OF
FORCED LABOUR AND
CHILD LABOUR
IN OPERATIONS AND
SUPPLY CHAINS
OF THE FLEX|N|GATE
GROUP
IN CANADA
FOR THE FISCAL YEAR
ENDING 31 DECEMBER
2024

REPORT ON ACTIONS TO FIGHT AGAINST FORCED LABOUR AND CHILD LABOUR IN
OPERATIONS AND SUPPLY CHAINS
FLEX|N|GATE GROUP IN CANADA
FOR THE FISCAL YEAR ENDING 31 DECEMBER 2024

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ARTICLE I THE REPORTING CONTEXT

Section 1.1 The Modern Slavery Law. In this report, “Flex Canada Group”, “we”, “our”, and “us” mean the entities listed in Section 1.2 below. Federal law in Canada - the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* S.C. 2023, c.9 (the “Act”) - requires that our Canadian companies state the actions taken during the most recently completed fiscal year to prevent and reduce the risk of forced labour or child labour within our operations and supply chains.

Section 1.2 A Joint Report. This is a joint report (“Report”) under the Act and was prepared by Flex|N|Gate Group’s member entity, Ventra Group Co. (“Ventra”) a Nova Scotia unlimited liability company licenced to conduct business under the Ontario *Extra-Provincial Corporations Act* R.S.O. 1990, c. E.27 (the “EPC Act”) for itself and for its Canadian affiliates:

- Flex-N-Gate Canada Company, a Nova Scotia unlimited liability company, licenced to conduct business under the EPC Act (“Flex-N-Gate Canada”),
- Vari-Form Manufacturing Inc. / Les Fabrications Vari-Form Inc., an Ontario business corporation (“Vari-Form”), and
- Ventra Assembly Company, a Nova Scotia unlimited liability company licenced to conduct business under the EPC Act (“Ventra Assembly”)

(collectively with Ventra, the “Flex Canada Group”).

For the purposes of the Act, the reporting entities covered in this report comprise companies that were wholly-owned and/or operated by the Flex|N|Gate Group of companies (www.flex-n-gate.com) in Canada between 1 January 2024 and 31 December 2024 , inclusive (the “Report Period”).

Section 1.3 The Flex|N|Gate Group.

(a) About the Group. The Flex|N|Gate Group (“Group”) is a leading manufacturer and supplier of parts, components, sub-systems and systems for the automotive industry with a global platform of seventy-eight (78) integrated manufacturing, product development and advanced product engineering facilities. Group companies operate facilities in the United States, Canada, México, Spain, France, Germany, Italy, China, and Argentina. Flex-N-Gate’s headquarters and principal operations are in the United States and the group is 100% American-owned. The Group’s manufacturing and product engineering skills include Static Analysis, Dynamic Analysis, Mold Flow Analysis and Deep Draw Formability Analysis. Group companies maintain physical and environmental product testing operations throughout North America and provide customers with comprehensive solutions using our collective resources of product engineering, manufacturing engineering, project management, testing, stamping, welding, molding, painting, plating, assembly, and shipping. The Group operates seven (7) North American testing facilities for lighting system and bumper and mechanical assembly component testing and validation, plus four (4) engineering centers around the world each of which collaborates seamlessly with one another and with our component production divisions.

(b) Flex|N|Gate Group Customers. Group products are found on the world’s leading automotive badges, including: Acura, Audi, Bentley, BMW, Buick, Cadillac, Citroen, Dacia,

Dodge, Fiat, Ford, General Motors, Genesis, GMC Truck, Honda, Hyundai, Infiniti, Jaguar, Jeep, KIA, Lamborghini, Land Rover, Lexus, Lincoln, Mazda, Mercedes-Benz, Mini, Mitsubishi, Navistar International, Nissan, Opel, Peugeot, Polestar, Range Rover, RAM, Renault, Rolls-Royce, SEAT, ŠkodaAuto, Smart, Subaru, Suzuki, Toyota, Volkswagen, and Volvo.

(c) Flex|N|Gate Group Products. The Group designs, manufactures and supplies the global automotive industry with complete advanced bumper assemblies, mechanical components, assemblies and systems, exterior painted plastic trim, interior plastic, stamped body-in-white, complex welded structural assemblies and advanced forward, in-vehicle and rear lighting for the light vehicle market. It operates a bleeding edge advanced lithium-ion battery designed and research centre in Windsor, Ontario Canada.

(d) The Group's Industry Achievements. The Group employs a global team of over 25,500 individuals. Founded in 1956, it ranked as one of America's Best Large Employers by Forbes magazine in 2021, 2022 and 2023 and as one of Canada's Best Large Employers in 2024. In recent years, Automotive News ranked the Group as North America's 5th largest supplier (28th largest globally). Industry accolades over the last decade include the following awards, in many cases for multiple and even consecutive years:

- | | |
|--|---|
| ➤ Chrysler Excellent Performance Award | ➤ Honda Supplier Performance Award |
| ➤ Chrysler Supply Chain Management Award | ➤ Jaguar Land Rover Supplier Performance Award |
| ➤ FCA Supplier of the Year – North America | ➤ Nissan Diversity Supplier Award |
| ➤ Ford Global Quality Brand Pillar Award | ➤ Nissan Quality Master Award |
| ➤ Ford Q1 Certification | ➤ Nissan Tier II Supplier Diversity Award |
| ➤ Ford Silver World Excellence Award, | ➤ Nissan Zero Defect Award |
| ➤ Ford World Excellence and Aligned Business Framework Partner Award | ➤ Renault Industrial Performance Award |
| ➤ Ford World Excellence Award for Aligned Business Principles | ➤ Subaru Excellence Award |
| ➤ Ford World Excellence Gold Award for Metal Bumpers | ➤ Subaru Silver Supplier Excellence Award |
| ➤ Ford World Excellence Silver Award for Metal Bumpers | ➤ Subaru Supplier Excellence Award |
| ➤ Ford World Excellence Award | ➤ Toyota Excellent Quality Award |
| ➤ GM Supplier of the Year Award, | ➤ Toyota Excellent Technology & Development Award |
| ➤ GM Supplier Quality Excellence Award, | ➤ Toyota Gold Quality Alliance Award |
| ➤ Honda Delivery Award | ➤ Toyota Gold Quality Excellence Award |
| ➤ Honda Quality and Delivery Award | ➤ Toyota Quality Performance Award |
| | ➤ Toyota TQA Gold Award |
| | ➤ VW Excellence in Development Award. |

(e) Minority Ownership Certification. In the United States, Flex|N|Gate Group has enjoyed minority supplier certification as a Minority Business Enterprise for over two decades (NMSDC National Minority Supplier Development Council) and in Canada, the group is a Canadian Aboriginal and Minority Supplier (Canadian Aboriginal and Minority Supplier Council).

(f) The Group's History in Canada. Flex|N|Gate Group has operated production facilities in Canada continuously since 1998 when it formed Flex Canada. The Group acquired

Ventra in 2001, formed Ventra Assembly in 2007 and acquired Vari-Form in December 2022. The Flex Canada Group operate exclusively in the Province of Ontario.

Section 1.4 Flex Canada Group's Corporate Structure.

(a) Flex-N-Gate Canada Co. Flex-N-Gate Canada is a Nova Scotia unlimited liability company with a registered address located at 1300, Purdy's Tower 2, 1969 Upper Water St., Halifax, Nova Scotia, Canada, B3J 3R7, and is licensed as an extra-provincial corporation in Ontario with its registered office at Suite 700, One Riverside Drive West, WINDSOR, Ontario, Canada N9A 5K3.

(b) Flex Canada's Products, Operations & Customers. Flex-N-Gate Canada engages in the design, manufacturing, sales and service of stamped, and welded metal components for the automotive passenger vehicle and light truck industries in Canada and elsewhere in the world. Its principal facility is located in Tecumseh Ontario. Flex Canada's customers are principally located in North America.

(c) Vari-Form Manufacturing Inc./ Les Fabrications Vari-Form Inc. Vari-Form is an Ontario business corporation with a registered address located Suite 700, One Riverside Drive West, WINDSOR, Ontario, Canada N9A 5K3.

(d) Vari-Form's Operations & Customers. Vari-Form engages in the design, manufacturing, sales and service of hydro-formed and welded structural components for the automotive passenger vehicle and light truck industry in Canada and elsewhere in the world. Its principal facility is located in Strathroy, Ontario. Vari-Form's customers are principally located in North America.

(e) Ventra Assembly Co. Ventra Assembly Co. is a Nova Scotia unlimited liability company with a registered address located at 1300, Purdy's Tower 2, 1969 Upper Water St., Halifax, Nova Scotia, Canada, B3J 3R7, and is licensed as an extra-provincial corporation in Ontario with its registered office at Suite 700, One Riverside Drive West, WINDSOR, Ontario, Canada N9A 5K3.

(f) Ventra Assembly's Products, Operations & Customers. Ventra Assembly engages in the assembly and sequencing of stamped, and welded metal and plastic injection molded components for the automotive passenger vehicle and light truck industries in Canada and elsewhere in the world. Its principal facility is located in Windsor Ontario. Ventra Assembly's customers are principally located in North America.

(g) Ventra Group Co. Ventra is a Nova Scotia unlimited liability company with a registered address located at 1300, Purdy's Tower 2, 1969 Upper Water St., Halifax, Nova Scotia, Canada, B3J 3R7, and is licensed as an extra-provincial corporation in Ontario with its registered office at Suite 700, One Riverside Drive West, WINDSOR, Ontario, Canada N9A 5K3.

(h) Ventra's Products, Operations & Customers. Ventra and its Flex Canada Group affiliates engage in the design, manufacturing, sales and service of stamped, welded, plastics injection molded, and painted components for the automotive passenger vehicle and light truck industry in Canada and elsewhere in the world. Ventra's products include automotive vehicle

structures (e.g. vehicle frames, bumpers, structural elements, body elements, etc.), painted and unpainted exterior fascias (plastic bumpers), fluid reservoirs, plastic exterior body elements, and various mechanical assemblies, including hinges and brake pedals. Ventra operates from 10 locations in Ontario including a leading-edge advanced lithium-ion battery research and development and prototype battery production center in Windsor, Ontario. Ventra's customers are located in North America, Europe and Asia.

(i) **Flex Canada Group Customers.** Flex Canada Group customers are original equipment automotive vehicle manufacturers and their various production and service part divisions. We are a Tier 1 supplier to our customers (and a Tier 2 Supplier to other Group entities outside Canada). We purchase raw materials, parts, sub-components, components, sub-systems and systems from Tier 2 suppliers (including other Group entities outside Canada).

(j) **Flex Canada Group Supply Chains.** Our predominant purchased raw materials comprise steel, fasteners, plastics, resins and paint. We purchase materials and goods locally to the greatest degree possible, but for certain components, the nature of our business requires that our supply chains remain global in geographical scope. We also purchase manufacturing equipment, including stamping presses, welding equipment, robotic assembly lines, dies, tools and fixtures, injection molding machines, paint lines, and advanced EV battery production equipment. We purchase electronics, sensors, actuators, lighting systems and various sub-components which we integrate into the products we supply to our customers. Our Flex-Ion™ battery innovation center procures highly specialized battery testing, formation and assembly equipment and diverse battery and electrode-active raw materials.

Section 1.5 Authority for this Report. This Report is made pursuant to section 11(2) of the Act and was approved by each Flex Canada Group's Board of Directors on 28 May 2024.

ARTICLE II INTRODUCTION

Section 2.1 Our Risks of Forced and Child Labour. Flex Canada Group entities employ over 4,000 associates across 12 production and design facilities in Ontario, Canada. The Group plays a role in promoting respect for human rights and responsible business practices across our world-wide operations, including the Flex Canada Group member companies. We recognize the risks of forced labour and child labour that exist in our operations and supply chains, and we therefore acknowledge that reducing and striving to eliminate all such risks requires that we collaborate with our communities, suppliers, associates and other stakeholders, meaningfully and persistently.

Section 2.2 This Report's Effective Period. This Report outlines Flex Canada Group's governance processes, investigations, measures, and the progress we have achieved in the Report Period to identify, mitigate, and eliminate the risks of forced labour and child labour and human trafficking across our supply chain.

ARTICLE III STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Section 3.1 Global Supply Chains. The Flex Canada Group members have established comprehensive supply chains whose purposes include purchasing raw materials, services, equipment, and other manufactured products for our manufacturing production needs. We work with suppliers already approved by the Group, our OEM customers, and with those suppliers who demonstrate sufficient continuing commitment to the automotive industry through the pursuit of recognized standards of improvement, operational excellence, community leadership, including adherence to relevant universal principles in favour of universal human rights against forced and child labour and human trafficking. We expressly communicate that our suppliers must adhere to relevant global principles in favour of universal human rights against forced and child labour and human trafficking.

We hold all suppliers to high standards of ethical conduct, including requiring them to establish, maintain and demonstrate their own processes that prohibit the use of forced labour and child labour in their operations and their supply chains.

ARTICLE IV FLEX|N|GATE GROUP'S POLICIES AND DUE DILIGENCE PROCESSES

Section 4.1 Global Policies; Local Application. We have implemented measures to assure due respect for all relevant human rights both within our own organization and along our entire supply chain. We have documented our affirmative stances favouring the promotion of human rights, rejecting discriminatory practices, modern slavery, human trafficking, forced labour and child labour and affirming fair and equitable treatment of all stakeholders.

Our commitment to respect for and promotion of human rights is a key element within the Group's common directive to its member entities across their operations and group value chain, and extends to their dealings with all suppliers, business partners, contractors, and customers.

Our relevant internal and supply chain related policies comprise:

1. Terms and Conditions of Supplyⁱ
2. Supplier Code of Conductⁱⁱ
3. Supply Chain Security Policyⁱⁱⁱ
4. Responsible Purchasing^{iv} and
5. Community Principles^v

Section 4.2 Our Diligence Activities and Codes.

(a) **Published Ethics and Community Principles.** The Group's affirmation of human rights and rejection of forced labour, child labour and human trafficking are central features of our published Supplier Code of Conduct policy and our Community Principles statement. These documents apply to each Group entity, including each Flex Canada Group member entity.

(b) **The Role of Our HR Specialists.** Individual human resources departments within each Flex Canada Group facility are tasked with ensuring that newly hired associates meet minimum age requirements under the Ontario Employment Standards Act, 2000, are eligible to

work within Canada pursuant to the Immigration and Refugee Protection Act, and are not subject to any form of forced or involuntary labor, in compliance with all applicable municipal, provincial, and federal regulations. We adhere to the laws, guidelines, and standards set forth by the jurisdictions in which we operate, including the Province of Ontario and the federal laws of Canada which apply in Ontario. Our commitment to regulatory compliance is integral to our operations, ensuring that we conduct business ethically and responsibly.

(c) **How We Communicate Ethics.** In the course of hiring and on-boarding associates, we furnish each individual with printed (or online links to) copies of: (i) our Code of Business Conduct and Ethics, and (ii) our Supplier Code of Conduct. We make these policy statements continuously accessible to each associate in the Flex Canada Group through a continuously accessible global corporate intranet. Therein, associate employees learn about and acknowledge our expectations of their ethical conduct and their vigilance in assuring that each supplier adheres relentlessly to the high ethical principles by which we operate our own businesses.

Beyond merely establishing a baseline for appropriate business conduct, our policies benchmark personal performance requirements related to our associates' fairness and respect for the dignity and worth of each individual and organization with whom we interact and foster a continuing respect for fundamental human rights. This is a foundation upon which Flex Canada Group entities build and expand, intending that all associates work within a framework that combines the most favourable possible work environment which concurrently exemplifies and reinforces our high values for individual human rights.

(d) **Our Community Principles.** Our commitment to support the expansion of human rights is grounded in our firm published declaration of opposition to any use of forced and child labour in our operations and our supply chains. Our Community Principles explain, embody and exemplify our affirmative value for positive human rights and they specifically address our corporate stances against all instances of forced and child labour in our operations and supply chains.

(e) **Human Rights Policies & Principles Against Modern Slavery.** Our approach in support of universal human rights specifically protecting against Modern Slavery (defined below), is informed by the relevant principles contained in

- ✓ The United Nations (“UN”) Universal Declaration of Human Rights^{vi},
- ✓ The International Labour Organisation (“ILO”) Standards^{vii},
- ✓ The UN Guiding Principles on Business and Human Rights^{viii}, and
- ✓ UN Global Compact^{ix}.

Section 4.3 Eliminating and Preventing Forced Labour. We commit to ensuring that forced labour in all its forms is prevented from occurring in, arising out of, or related to our business activities. In this report, “Modern Slavery” includes modern slavery, practices which are comparable in effect to slavery, bonded labour, bonded debt, trafficking in persons, prison labour, compulsory labour, military work, unlawful recruitment of children, and domestic servitude. We also commit to ensuring protection for those categories of workers who are notoriously vulnerable to exploitation.

Section 4.4 Preventing/Eliminating Human Trafficking. We commit to ensuring that human trafficking in all its forms is prevented from occurring across our operations, in line with the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime^x.

Section 4.5 Actions Taken in 2024. We are committed to taking proactive and deliberate action in combating slavery, forced labour, child labour, and human trafficking within our operations and supply chains. Commencing 2023, we promulgated a new Supplier Code of Conduct. The Code expressly confirms that forced and child labour are strictly prohibited. We implemented the Supplier Code of Conduct in 2024.

Our suppliers are contractually bound to our Standard Terms and Conditions of Supply which contain specific provisions that reiterate - as a continuing condition of entitlement to do business with us - our unambiguous opposition to forced and child labour and human trafficking and our requirement that each supplier adopt and abide those obligations.

Each member of the Flex Canada Group commits to improve its continuing efforts to address the problems of forced and child labour and human trafficking in our operations and supply chains. We regularly review and update our policies and procedures to assure alignment with best practices and legal requirements and compliance with our stated principles and policies.

ARTICLE V IDENTIFYING AND REPORTING RISKS

Section 5.1 Risk Reporting; Multiple Access Points. We offer multiple channels to communicate unethical or unsafe or potentially unethical or unsafe behaviors and situations to individuals and other stakeholders wishing to report a business concern^{xi} (including with respect to child or forced labour or human trafficking and their derivative conducts). These include an anonymous whistleblower hotline/tipline, direct workplace feedback, rights to management and executive escalation and a robust framework for iterative feedback. We actively encourage all stakeholders to report any instances of modern slavery or human trafficking they encounter, including by doing so anonymously, within a criticism- and retaliation-free environment.

Section 5.2 Anonymous Reporting: Lighthouse™. The Group proactively manages forced labour and child labour risks by providing an external, independent, global reporting portal that uses a free telephone line accessible 24 hours a day, 7 days a week. The hotline is available to any individual to report all unethical and safety violations, including child labour or forced labour concerns. It is persistently available to the member entities in the Flex Canada Group.

Maintained by a confidential and third person agency, The Lighthouse Services, Inc. (“Lighthouse™”)^{xii} provides a hotline service made widely available to employees, suppliers, and external stakeholders. Reports can be made by phone, email or through our website, always anonymously. We expressly assure callers/reporters that all reports will be received without fear of attribution or reprisal. Lighthouse™ reports are recorded, transcribed and are reviewed immediately, both centrally in our security department and locally at plant levels, as required. We take each Lighthouse™ report seriously and, if the reporter expressly requests such contact, we reach out to each caller/reporter immediately to continue our investigation. Potential claims are evaluated, properly disseminated, and fully investigated using an industry-tested Lighthouse

Investigation Procedure. Lighthouse™ reports customarily lead to either specific remediation of reported situations of concern or confirmation that no such situations are present.

Section 5.3 Staff Allocated to Modern Slavery Compliance. Prior to the Reporting Period, we had identified a team of specialists to oversee compliance with relevant laws and regulations regarding modern slavery and human trafficking. This team buildout and activity was continued in the Reporting Period and now comprises member representatives from managerial to executive across diverse functions including human resources, procurement, customs, corporate governance, and legal.

Section 5.4 Continuing Education of our Team Members. In the Reporting Period, we participated actively in industry initiatives and training programs designed to enhance transparency and foster ethical conduct in operations and supply chains. We collaborated with other organizations, and significant stakeholders including customers and suppliers to exchange knowledge and best practices in combatting slavery and human trafficking.

Section 5.5 Planned Risk Evaluation. Prior to the Reporting Period, we had engaged in a focused risk assessment (layered audit) of our operations and supply chains to specifically identify potential areas of vulnerability to modern slavery and human trafficking. In the Reporting Period, we continued and broadened this assessment to gather data (supplier questionnaires) and analyses of our geographic footprints and supply chain structures. We intend that all forced labour or child labour concerns we receive through our customer or supplier affiliations, will be promptly and fully investigated and pursued through to the implementation of a fair and equitable conclusion for all affected.

Across all facilities operated or managed by the Flex Canada Group, local managers have established and deployed processes and resources to identify and review relevant Modern Slavery risks, including those related to or arising out of human trafficking and forced and child labour. Management has prioritized the integration of rigorous identification and assessment of such risks more fully into its risk management tools and practices; in turn each facility accepts direct responsibility for, adopts and relies on each of these measures.

Section 5.6 Risks. We acknowledge the possibility that human rights violation risks related to our operations and supply chains cannot be entirely excluded. In our assessment, these include, without limitation, the following:

(a) **Supply Chains.** The industry in which we operate is a significant purchaser of commodities and assembled or partially products that involve diverse supply chains, including multiple subcontractor tiers. We cannot completely exclude the possibilities that exploitative labour conditions, including forced labour and child labour, occur at one or more stages of such supply chains. The risks of such occurrences vary depending on factors such as product categories, tier of supply, country of origin and the degree of adequate market competition and alternatives.

(b) **Outsourced Labour Services.** Our facilities by contract with third-person service providers to complete specific tasks, including, but not limited to, landscaping, security, maintenance, painting, resurfacing, sorting, packaging and transportation. We cannot entirely exclude the possibilities that certain systemic lack of job security and limited legal protections could make individuals who work for such contractors more vulnerable to employer exploitation.

The risks of such occurrences vary depending on factors such as service categories, tier of supply, country of origin and the degree of adequate market competition and alternatives.

(c) Temporary Labour Sourcing, including Foreign and Migrant Labourers. Our facilities may engage temporary labour services through employment agencies, especially in the case of filling specific labour gaps (e.g., seasonal positions, temporary part-time work and the construction of properties by owner-hired contractors, etc.). Individuals who serve in such roles may be at greater risk of exploitation due to their transient status and significant lower bargaining power. In certain markets, the hospitality industry may employ migrant workers, who are recruited through labour agencies, and who may be particularly vulnerable to exploitation due to language barriers, lack of legal documentation, and limited knowledge of their rights. The risks of such occurrences vary depending on factors such as service categories, tier of supply, country of origin and the degree of adequate market competition and alternatives.

(d) Human Trafficking. Our facilities cannot entirely exclude the possibility of being used as instruments of human trafficking. Traffickers may exploit systemic vulnerabilities, such as the anonymity provided by temporary accommodations, to coerce individuals into commercial sexual exploitation or forced labour. The risks of such occurrences depend principally on the types of products and countries of origin.

ARTICLE VI REMEDATION & MITIGATION

Flex-N-Gate Group policies, training, diligence, risk management practices and the cross-sector collaboration described in this Report, each of which are adopted and practiced by the Flex Canada Group member companies, are designed to mitigate and to the degree possible, eliminate the above risks.

We hold our associates, managers, executives and our suppliers to high standards of ethical conduct. In the latter case, Flex|N|Gate Group communicates its expectations regarding human rights and labour practices through our Supplier Code of Conduct and Standard Terms and Conditions of Supply. We, in turn, engage with all stakeholders actively to ensure compliance with these standards.

Section 6.1 Remedial Measures.

Our continuing identification of the risks of forced labour or child labour in our businesses requires that we conduct a comprehensive review of our operations and supply chains, including both our direct suppliers and their subsidiary tier suppliers. In the Reporting Period, we investigated the risks in our supply chain to amplify and communicated our express expectations that suppliers:

- ✓ Support the elimination of forced labour and human trafficking
- ✓ Ensure that no worker pays for a job. Fees and costs associated with recruitment and obtaining employment must not be paid by workers
- ✓ Comply with all applicable laws regarding recruitment and hiring of workers, including workers provided by temporary help agencies
- ✓ Prevent all situations in which any worker is indebted or coerced to work
- ✓ Condemn all forms of exploitation of children and not use child labour directly or indirectly in their supply chain, in accordance with the relevant ILO standards

- ✓ Provide relevant training to Supplier employees to ensure compliance with applicable ILO standards, and any other relevant laws and policies
- ✓ Have a reasonable system in place to assess, on an ongoing basis, their own effectiveness in ensuring that forced labour and child labour are not being used in the Supplier's own business and supply chain
- ✓ Collaborate with reasonable requests arising in the course of human rights-related audits, investigations, or information requests by the local management or by any law enforcement authority with applicable jurisdiction

Section 6.2 Mitigating Effects.

Nothing came to our attention in the Reporting Period to suggest we need to take any direct actions or implement any direct remediation measures concerning forced or child labour or human trafficking. Regardless, our Standard Terms and Conditions of Supply grant us the power to design, implement and enforce appropriate remediation measures where required and in turn, hold our suppliers responsible for assuring the remedial effectiveness.

ARTICLE VII ASSOCIATE TRAINING

Section 7.1 Policy Publication. We make our Supplier Code of Conduct policy and our Community Principles statement readily and continually available to our employees and suppliers, both at time of hire or engagement, and on our global corporate intranet. Our Code of Conduct and Business Ethics includes express expectations against the evils of modern slavery; these are hard-coded into our Standard Terms and Conditions of Supply, resulting a binding and legally/commercially enforceable contract of performance between each of our associates and their respective counterparts at our suppliers.

Section 7.2 Continuing Education of Employees. In the Reporting Period, we continued prior efforts to conduct additional, targeted employee training to amplify our message and broaden our commitment against modern slavery. We will work to be certain our employees understand these expectations and are empowered to freely bring any concerns forward that may require investigation.

ARTICLE VIII ASSESSING EFFECTIVENESS

In the Reporting Period, we rigorously deepened our understanding of the broader community expectations of combatting Modern Slavery, especially as they apply to forced labour and child labour and human trafficking. With this heightened awareness and amplified knowledge, we have now completed our revision of various foundational documents and policies and commenced the process of gathering supplier information and statistics to inform our journey to address these concerns.

We assessed our alignment to these expectations using multiple iterative surveys, responses and written evidence which we also submitted to third-person sustainability agencies. These independent agencies in turn ranked us with specific scores and comprehensive feedback on our current processes, providing us with meaningful guidance on how best to aim or future

efforts to improve our performance and reduce the risks of/eliminate Modern Slavery within our businesses.

ARTICLE IX APPROVAL AND ATTESTATION

This Report was approved with effect on 29 May 2025, pursuant to subparagraph 11(4)(b)(ii) of the Act by the Boards of Directors of each of Ventra Group Co., and its affiliates, Flex-N-Gate Canada Company and Vari-Form Manufacturing Inc. / Les Fabrications Vari-Form Inc. and Ventra Assembly Company.

In accordance with the requirements of the Act, 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 Period.

Ventra Group Co. for itself and on behalf of its affiliates,
Ventra Assembly Company, Flex-N-Gate Canada Company
and Vari-Form Manufacturing Inc. / Les Fabrications Vari-
Form Inc.

Shahid Rafiq Khan



Sole Director, Chief Executive Officer, Chief Operating
Officer & President
30 May 2025

ⁱ [CPUPL.00002-Standard-Terms-and-Condition-of-Supply-v2.pdf](#)

ⁱⁱ [CPUPL.00003-FNG-Supplier-Code-of-Conduct-v1.pdf](#)

ⁱⁱⁱ [Supplier's Resources - Flex N Gate](#)

^{iv} [Sustainability - Flex N Gate](#)

^v [CLEPL.00004_Community_Principles_v1.pdf](#)

^{vi} <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

^{vii} <https://www.ilo.org/international-labour-standards>

^{viii} <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>

^{ix} <https://unglobalcompact.org/>

^x [Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime | OHCHR](#)

^{xi} Including the risk or occurrence of actual child or forced labour or human trafficking and their derivative conducts.

^{xii} Hotline Phone: +1.800. 398.1496 or www.lighthouse-services.com/flex-n-gate