

Introduction

This joint report is produced by Eddyfi Holding Inc. (“**Eddyfi**”), a corporation governed by the *Business Corporations Act* (Québec) and its subsidiaries Eddyfi Canada Inc. (“**Eddyfi Canada**”) and Zetec, Inc. (“**Zetec**”) (collectively, the “**Reporting Entities**”) for the financial year ending December 31, 2025 (the “**Reporting Period**”). This report outlines the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Reporting Entities, pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

Eddyfi’s Business

Eddyfi is a global leader in advanced non-destructive testing instrumentation, providing inspection technologies to assess structural integrity of critical assets. Eddyfi offers a broad and integrated range of capabilities, including test & measurement instrumentation, advanced sensing, automated remote monitoring, robotics, and software across key industries such as nuclear power generation, aerospace, defense, civil infrastructure, oil & gas, transportation and more. Headquartered in Québec (Canada), with a global footprint, world class R&D capabilities, and deep domain expertise, Eddyfi serves customers in more than 110 countries and empowers them to enhance safety and productivity, protect the environment and save lives. The Eddyfi group employs more than 1,000 people.

Reporting Entities’ Supply Chains

Eddyfi is headquartered in Québec (Canada), and the manufacturing facilities of the Reporting Entities are located in Canada (Québec) and the United States (Snoqualmie, Washington). The supply chains of the Reporting Entities are similar, with their suppliers mainly providing mechanical and electronic parts and components and tooling equipment required to build the group’s inspection instruments. The majority of the Reporting Entities’ suppliers are located in Canada, the United States and Europe.

Steps to prevent and reduce risks of forced labour and child labour

Eddyfi advocates respect for the principles of the Universal Declaration of Human Rights (UDHR) and the core conventions of the International Labour Organization (ILO). It formalizes this commitment in its internal *Code of Conduct & Ethics*, which was updated during the Reporting Period, and publicly available [Supplier Code of Conduct & Ethics](#). The Reporting Entities are guided by Eddyfi’s global policies, best practices, and procedures which apply to the whole group; however, they are afforded the entrepreneurial latitude to operate as autonomous platforms and to also put in place policies and procedures specific to their context.

All Reporting Entities aim to prevent and reduce the risk that forced labour or child labour is used in their business activities and supply chains. The Reporting Entities’ *Terms and Conditions of Purchase* embed Eddyfi’s *Supplier Code of Conduct & Ethics* or include a standalone clause on anti-human trafficking and slavery.

Policies

All Reporting Entities have policies in place that embed the human rights considerations into business conduct. Eddyfi’s Board of Directors has oversight and responsibility for the group’s Environmental, Social, and Governance (ESG) strategy, policies and practices, and the Board’s Compensation, Nominating, Governance and Sustainability (CNGS) Committee has oversight for Eddyfi’s *Code of Conduct & Ethics* and investigating any potential breaches thereof.

Code of Conduct & Ethics

Eddyfi's internal *Code of Conduct & Ethics* (the "**Code**") applies to Eddyfi, all its direct and indirect subsidiaries, and all its employees and consultants, who are bound by it. The Code was last updated in November 2025 and includes legal and ethical principles to which employees and consultants are expected to adhere, including a commitment to complying with freedom of association, collective bargaining and immigration laws, as well as laws prohibiting forced labour and child labour. Breaches or alleged breaches of the Code are investigated and may result in disciplinary action, up to and including termination of employment or business relationship, and may lead to civil, criminal or penal proceedings. For regulatory purposes, Zetec has adopted its own *Code of Conduct & Ethics*, which is based on the same principles as Eddyfi's and also includes a statement on anti-human trafficking and modern-day slavery. Likewise, its *Employee Handbook* contains a zero-tolerance statement on any form of human trafficking by its employees, agents or subcontractors.

Supplier Code of Conduct & Ethics

Eddyfi's [*Supplier Code of Conduct & Ethics*](#) (the "**Supplier Code**") defines expectations regarding suppliers, consultants, subcontractors, service providers, agents and distributors (together, "**Suppliers**") for Eddyfi and all its direct and indirect subsidiaries.

The Supplier Code, last updated in October 2025, requires Suppliers to respect the principles of the Universal Declaration of Human Rights (UDHR) and the core conventions of the International Labour Organization (ILO). It further requires that Suppliers commit to complying with labour standards, freedom of association, collective bargaining and immigration laws, as well as laws prohibiting human trafficking, modern slavery, forced labour and child and underage labour.

Eddyfi Canada's *Terms and Conditions of Purchase* requires the supplier to comply with the Eddyfi *Supplier Code of Conduct & Ethics*. Zetec's *Purchase Order Terms and Conditions* were updated in May 2023 and include a 'Human Trafficking and Slavery' clause requiring the seller to ensure that no items are manufactured or handled by indentured, slave, or prison labor or by children under the age of 14 (or such older age as applicable in any jurisdiction). The seller is expected also to comply with Zetec's *Policy against Human Trafficking and Slavery*.

Policy Against Human Trafficking and Slavery

Zetec's [*Policy Against Human Trafficking and Slavery*](#) defines how it makes efforts to eradicate human trafficking, forced labour and unlawful child labour from its organization and its supply chains. The policy covers all employees of Zetec and all its suppliers, subcontractors or business partners.

Assessing and managing risk of forced and child labour

In 2024, the Reporting Entities engaged an independent consultant to conduct an initial risk identification assessment of forced labour and/or child labour in their supply chains. The risk assessment covered all group entities with imports and aimed to identify potential risks of forced labour or child labour in direct supply chains. Specifically, this exercise assessed the organization's tier one (direct) suppliers with prior year import spending located in countries identified as having known risk of forced and/or child labour through open-source resources (e.g., CSR Risk Check).

Each supplier's website or other open-source platform was evaluated to better understand the nature of the supplier's business model and practices to identify inherent potential vulnerabilities to forced and/or child labour based on contextual factors and to review any public policies and/or commitments prohibiting forced and/or child labour in their activities and/or supply chain.

This assessment identified some countries in which Eddyfi does business, often in connection with certain products/industries found in its supply chains, that may be more at risk of using forced labour and/or child labour.

During the Reporting Period, the Reporting Entities initiated a supplier consolidation project to streamline the supplier base of the Eddyfi group and strengthen oversight of key suppliers. As part of this initiative, suppliers are being assessed through a standardized questionnaire that includes specific questions related to forced and child labour. This process also led to the identification of a group of key suppliers representing up to 70% of the total spend of the Eddyfi group and a significant reduction in the number of suppliers. Such key suppliers are required to complete the supplier questionnaire.

Due diligence processes

As discussed above, during the Reporting Period, the Reporting Entities started formalizing a due diligence process related to forced and child labour, building on the results of the 2024 risk identification assessment and the supplier consolidation initiative. As part of this process, a standardized supplier questionnaire incorporating forced and child labour considerations is being deployed to key suppliers. In 2026, more in-depth due diligence activities will be conducted on suppliers identified as higher risk, with the objective of strengthening risk mitigation measures and improving ongoing monitoring of forced and child labour risks within the supply chain of the Eddyfi group.

Actual or suspected violations of the Code or Supplier Code can be reported, anonymously and confidentially, through the Eddyfi Alert Platform accessible toll-free by telephone at (800) 461-9330 or via the [website](#). This platform is available 24 hours a day, 7 days a week and is operated by EQS, an independent entity. Eddyfi undertakes not to retaliate against any person who, in good faith, reports a violation.

Remediation measures and remediation of loss of income

During the Reporting Period, the Reporting Entities did not identify any specific instances of forced labour or child labour or a situation where families could have experienced any loss of income as a result of steps taken to address forced labour or child labour. As such, no remediation measures have been undertaken.

Training

During the Reporting Period, the Reporting Entities did not provide training to employees specifically on forced or child labour topics. In 2026, the Reporting Entities intend to introduce mandatory modern slavery training for certain key employees, including in the operations, procurement and sales teams.

All employees of Eddyfi have an obligation to read and acknowledge Eddyfi's *Code of Conduct & Ethics* upon joining Eddyfi or one of its subsidiaries and on an annual basis thereafter. Employees are asked questions related to the Code's content before signing their acknowledgement to confirm their understanding of the Code. All Eddyfi's employees also have access to an online course catalog which includes training on ethical topics.

Zetec's employees are also required to review and sign its *Code of Conduct & Ethics* each year. Its employees are also required to sign a statement of understanding of the *Employee Handbook*, which includes a statement of zero tolerance for human trafficking.

Assessing effectiveness

As the due diligence process related to forced and child labour is in the process of being implemented, the Reporting Entities are not yet in a position to assess its effectiveness in preventing and mitigating risks within their activities and supply chains.

Approval and attestation

This report was approved by the Board of Directors of Eddyfi Holding Inc. pursuant to subparagraph 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of Executive Chairman of Eddyfi Holding Inc., attest that I have reviewed the information contained in the report on behalf of the governing body of the 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 within this report.

I have the authority to bind Eddyfi Holding Inc.



Per: 73411BC22C4CFBD5C6232651B87FE4DF contractworks.

Martin Thériault
Executive Chairman
May 12, 2026