

BILL S-211

An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

REPORT

Modern Slavery Statement for the Financial Year ended 27th September 2025

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by Guelph Manufacturing Group Inc to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing 29th September 2024 and ending 27th September 2025.

Guelph Manufacturing Group Inc. is committed to respecting human rights and ensuring that our supply chain is free from forced labour and child labour.

Group Structure

Guelph Manufacturing Group Inc was established on 20th September 1968 under the name Guelph Tool & Die Inc. We shortened the name of the corporation in 2001 to Guelph Tool Inc and in 2016 we changed the name from Guelph Tool Inc to Guelph Manufacturing Group Inc. with our Corporate office at 39, Royal Road, Guelph, Ontario, Canada N1H 1G2.

Supply Chain

- We are a tier 2 Automotive Components Manufacturer based out of Guelph Ontario Canada. Our main input is rolled steel, coiled Steel and Tubes.
- We are the manufacturers of Stamped products like automotive seat frames and Arm rests and Headrest accessories
- We manufacture the above products within our 3 facilities which are located in Guelph Ontario at addresses mentioned below:
 - 39, Royal Road Guelph Ontario
 - 20 Massey Road Guelph Ontario
 - 40 Lewis Road Guelph Ontario
- We procure steel (Coiled, Wires and Tubes) and other raw materials from our suppliers who are majorly based out of US and Canada

CORPORATE OFFICE

39 Royal Road
Guelph, Ontario
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[519] 822 5401

WEBSITE:

www.guelphmanufacturing.com

Risks in Supply Chain

Guelph Manufacturing Group Inc. is committed to respecting human rights and ensuring that forced labour and child labour is not a part of any product within your supply chain.

We have a very elaborate Supplier Expectation Manual (SEM) which along with other items conveys our commitment towards respecting human rights and Guelph Manufacturing Group's intolerance towards forced labour and child labour. We expect all our suppliers to follow our supplier code of conduct in essence. As a process of onboarding any new supplier, we ask our potential new supplier to read and confirm our Supplier Expectation Manual (SEM) and expect them to adhere to the same.

Risks to our supply chain

- We continue to evaluate our supply chain to ensure that we are not in any form or manner directly or indirectly in contravention of our internal policies of respecting the human rights and prevention of forced labour and child labour. Therefore as part of our continued efforts, we insist that suppliers adhere to our supplier Expectation Manual and ensure compliance for their supply Chain.

Actions Taken

- Guelph Manufacturing Group is a member of IATF and ISO /TS 16949 certified.
- Reinforce the Guelph manufacturing Group's commitment on human rights/labour rights with our suppliers on periodic basis.
- Reinforce the terms and conditions mentioned in our supplier agreements that includes adherence to our Supplier Expectation Manual (SEM)

Risk Assessment

We ask our suppliers to fill out a risk assessment questionnaire or else confirm the adherence to our Supplier Expectation Manual.

Our SEM clearly lays down expectations regarding the commitment of maintaining the global working conditions and standards that result in dignified and respectful treatment of all employees within all our global operating locations, as well as those of our supply chain. It is therefore Guelph Manufacturing Group's expectation that our suppliers will have appropriate policies, procedures and systems in place, to support the following standards:

- a) Child labour shall not be utilized. Underage labour, as defined by local labour law, will not be utilized unless it is part of a government approved training or apprenticeship program that clearly benefits the participants.
- b) Any form of forced or compulsory labour is prohibited.

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- c) Workers, without fear of reprisal, intimidation or harassment should be able to communicate openly with management regarding working conditions. They shall also have the right to associate freely and join labour unions and workers' councils in accordance with local laws.
- d) Workers shall be protected against any form of harassment and discrimination in any form, including but not limited to gender, sex, age, religion, disability and political beliefs.
- e) Workers shall have a safe and healthy workplace that meets or exceeds all applicable standards for occupational health and safety.
- f) Workers shall be compensated with wages and benefits that are competitive and comply with local law, including minimum wages, overtime hours and legally mandated benefits.
- g) Working hours shall comply with all applicable local laws regulating hours of work. It is our expectation that all our suppliers will maintain these global working conditions in all their operations, while also promoting adoption of these principles with their own suppliers.

Remediation

No issues have been identified within our supply chain

Training

- The employees in our procurement team are very well aware of our policy regarding the supplier onboarding process which includes the Supplier Expectation Manual. We do encourage our employees to read and acknowledge the Supplier Expectation Manual which Outlines our approach towards the working conditions and standards.
- All PO's sent to suppliers have as the terms and conditions of the purchase order stating "Subject to Guelph Manufacturing Group Inc. Supplier Expectation Manual"

Effectiveness Assessment

In order to reinforce our commitment to fight against Forced Labour and Child Labour in Supply Chains, we have asked our suppliers for their commitments to fight against the Forced labour and Child labour.

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Sign off

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For **GUELPH MANUFACTURING GROUP INC**



Rob Ireland

President

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