



Technologies Limited

2024 Forced and Child Labour Report

Introduction

This report is prepared by Exco Technologies Limited ("Exco") and its subsidiaries, Exco Automotive Solutions, Inc. ("EASI") and AFX Industries LLC ("AFX") located in the United States of America (collectively "Company", "we" or "our"), for the fiscal year ending September 30, 2024, pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). It sets out the steps the Company has taken to prevent and reduce the risk that forced labour or child labour is used in any step of our business or in our supply chains.

About our organization

Incorporated in Ontario and headquartered in Markham, Ontario, Exco is a public company listed on the TSX. It is a global leader in the design, development, and manufacturing of die-cast moulds and extrusion dies and related machinery components as well as automotive interior trim components. It directly manufactures these products at four production facilities located in Ontario and Nova Scotia employing approximately 700 people. It is also a holding company which owns numerous subsidiaries manufacturing these products at 17 other locations in eight other countries employing over 4,300 people and serving a diverse and broad customer base.

Two of these subsidiaries, EASI and AFX sell to several customers in Canada and accordingly meet threshold criteria for inclusion under the Act.

Our supply chain is extensive, sourcing materials from many different countries, primarily focused on the automotive parts and steel machining sectors. The primary supply chain for Exco's steel machining businesses is for specialty steel and sophisticated machinery

equipment, which is mostly sourced from Europe and Japan, and to a much lesser extent from China. EASI and AFX source a variety of plastics and leather from USA, Europe and Mexico.

Our policies addressing slavery and human trafficking risk

We are committed to providing a safe, respectful and inclusive environment, free of harassment, inhumane treatment and unlawful discrimination. We do not tolerate any forms of physical, sexual, psychological or verbal abuse of our employees. We condemn child labour and any kind of forced labour and have implemented policies and procedures to minimize the risk that forced or child labour is used anywhere in the production of our goods or services.

Our relevant policies include:

Code of Ethics and Business Conduct:

Our Code of Ethics and Business Conduct is foundational to maintaining our commitment to integrity and human rights across all of our operations. This comprehensive document outlines the standards for:

Behavioral Expectations: Requiring all employees and executives to conduct themselves with integrity, honesty, and fairness.

Prohibitions: Explicitly prohibits all forms of forced labour, child labour, and human trafficking.

Compliance and Reporting: Establishing clear guidelines for reporting ethical breaches, including anonymous reporting mechanisms via a dedicated hotline and online portal, ensuring all reports are handled confidentially and without retaliation.

Supplier Code of Conduct:

Our Supplier Code of Conduct was developed under the stewardship of Exco's Governance and Nominating Committee and approved by Exco's Board of Directors on November 29, 2023. It extends our ethical and business conduct standards to our supply chain, requiring all suppliers to adhere to the following principles:

Human Rights: Suppliers must respect human rights and ensure they are not complicit in any abuse; all forms of forced labour, child labour, human trafficking and unlawful employment practices are explicitly prohibited.

Responsible Procurement: To the extent applicable, suppliers will have a written policy and procedures to avoid knowingly acquiring conflict materials or unsustainably mined materials produced at high environmental and social costs.

Health and Safety: Suppliers will maintain a healthy and safe work environment for all employees.

Environment: Suppliers will follow applicable local, national and international environmental laws.

Business Conduct and Anti-Corruption Practices: Suppliers will uphold the highest standards of integrity in all business interactions. Also requires suppliers to provide a clearly communicated grievance mechanism for workers to utilize to report integrity concerns, human rights concerns, safety issues and misconduct without fear of reprisal.

These policies ensure that both the Company and its suppliers operate in a manner that respects human dignity and is free from exploitation.

Measures taken to prevent and reduce the risks of forced labour and child labour

During 2024, we implemented our comprehensive entity-wide Supplier Code of Conduct, which sets minimum standards for all of our suppliers and business partners. Our entity-wide Supplier Code of Conduct covers key ESG topics and human rights provisions (including those pertaining to forced and child labour).

Also in 2024, we updated our Employee Code of Conduct outlining our policies regarding forced labour, child labour and human trafficking risk. The Company's employees and Exco's Board of Directors will be required to review and attest to the Code of Conduct annually.

Additional measures during the past year to prevent and reduce the risks of forced labour and child labour included 1) a review of the USA Uyghur Forced Labor Prevention Act (UFLPA) Entity List to ensure Exco does not source any inputs from or have any other dealings with any of these entities and 2) a review of the U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour to help assess our identification of higher risk suppliers for manufacturing inputs and supplies.

The Company relies on global supply chains which present visibility challenges, however no definitive risk areas have been identified. We consider the risk of forced labour or child labour to be low in our operations. With respect to the key inputs used in our supply chains (specialty steel, machinery, plastics and leather), these are mostly products that have sophisticated technical processes and mostly sourced from non-developing countries, which have a lower prevalence of forced and child labour. All employees are hired in accordance with, at a minimum, the applicable laws and regulations.

In 2025, the Company will further analyze its supply chains to identify any risk of forced labour and child labour that might be occurring. We also plan continued dialogue with our key vendors to understand their actions to address possible instances of forced and child labour.

Remediation measures

In the last fiscal year, we have not identified any incident of forced labour or child labour in our activities or supply chain. We therefore did not take any measures to remediate an incident of forced labour or child labour.

If we do identify incidents of forced labour within our activities or supply chain, we will consider the appropriate remediation strategies in compliance with international standards.

Our employees are encouraged to raise any questions or concerns regarding ethics or policy compliance with the management team or Human Resources. In addition, through the Exco Alertline (<http://exco.alertline.com>) employees can anonymously raise any concerns related to accounting, internal controls or ethical issues. We prohibit all forms of retaliation against those who raise concerns in good faith, and we appropriately and timely investigate reports and take corrective action, if needed.

Training

The Company is committed to ensuring that its employees, directors, and officers have access to its Employee Code of Conduct. We are in the process of developing consistent training for our employees.

Assessing effectiveness

Exco regularly reviews and audits its policies and procedures. However, Exco has not yet adopted specific measures to assess the effectiveness of its actions to prevent and reduce the risk of forced labour or child labour in its operations and supply chains. Exco intends to evaluate its effectiveness in preventing and reducing these risks in 2025 and beyond.

Approval and attestation

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Exco Technologies Limited.

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 for Exco. Based on my knowledge, and having exercised reasonable due diligence, I attest that the information contained in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Darren Kirk

Director, President and CEO, Exco Technologies Limited

I have authority to bind Exco Technologies Limited

Date: May 8, 2025