



*Technologies Limited*

## **2025 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"), each of which is located in the United States of America (collectively, the "Company", "we" or "our"), for the fiscal year ended September 30, 2025, 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 at any stage of its business or 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 manufacture 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 and employs approximately 700 people. It is also a holding company that owns numerous subsidiaries manufacturing these products at 16 other locations in eight other countries, employing over 4,000 people and serving a broad and diverse customer base.

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

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

machinery and equipment, sourced primarily from Europe and Japan and, to a much lesser extent, from China. EASI and AFX source a variety of plastics and leather from the United States, 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 form of physical, sexual, psychological or verbal abuse of our employees. We condemn child labour and all forms of forced labour and have implemented policies and procedures intended to minimize the risk that forced labour 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 our commitment to integrity and human rights across our operations. It outlines standards relating to ethical conduct, including the expectation that employees and executives act with integrity, honesty and fairness.

The Code of Ethics and Business Conduct expressly prohibits all forms of forced labour, child labour and human trafficking.

It also establishes guidelines for reporting ethical concerns, including anonymous reporting mechanisms through a dedicated hotline and online portal, and requires that reports be 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 and requires suppliers to adhere to principles relating to human rights, responsible procurement, health and safety, environmental compliance, and business integrity.

Among other things, the Supplier Code of Conduct requires suppliers to respect human rights and not be complicit in abuse, and it expressly prohibits forced labour, child labour, human trafficking and unlawful employment practices.

To the extent applicable, suppliers are also expected to maintain written policies and procedures intended to avoid knowingly acquiring conflict materials or unsustainably mined materials produced at high environmental and social cost.

The Supplier Code of Conduct further requires suppliers to maintain a healthy and safe work environment for employees and to comply with applicable local, national and international environmental laws.

It also requires suppliers to uphold high standards of integrity in business interactions and to provide a clearly communicated grievance mechanism that workers may use 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**

In 2024, the Company introduced its entity-wide Supplier Code of Conduct, which sets minimum standards for suppliers and business partners and includes key ESG and human rights provisions, including those related to forced labour and child labour.

In 2024, the Company also updated its Employee Code of Conduct to strengthen and clarify its expectations regarding forced labour, child labour and human trafficking risk. These measures remained in effect during the 2025 reporting year and continued to support the Company's approach to identifying and addressing such risks. The Company's employees and Exco's Board of Directors are required to review and attest to the Employee Code of Conduct annually.

During the 2025 reporting year, additional measures to prevent and reduce the risks of forced labour and child labour included: (i) a review of the U.S. Uyghur Forced Labor Prevention Act Entity List to help confirm that Exco does not source inputs from, or otherwise deal with, listed entities; and (ii) a review of the U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor to assist in identifying potentially higher-risk suppliers, 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 in our operations to be low. With respect to the key inputs used in our supply chains, namely specialty steel, machinery, plastics and leather, these are generally products involving sophisticated technical processes and are sourced primarily from non-developing countries, where the prevalence of forced labour and child labour is generally lower. All employees are hired in accordance with, at a minimum, applicable laws and regulations.

In 2026, the Company will continue to analyze its supply chains to identify any risk of forced labour or child labour that may be present. The Company also plans to continue engaging with key vendors to better understand the actions they are taking to address possible instances of forced labour and child labour.

### **Remediation measures**

During the last fiscal year, we did not identify any incidents of forced labour or child labour in our activities or supply chains. Accordingly, no remediation measures were required.

If we identify incidents of forced labour or child labour within our activities or supply chains, we will consider and implement appropriate remediation strategies in compliance with applicable legal requirements and informed by relevant international standards.

Our employees are encouraged to raise any questions or concerns regarding ethics or policy compliance with management or Human Resources. In addition, through the Exco Alertline (<http://exco.alertline.com>), employees may anonymously raise 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 investigate reports appropriately and in a timely manner and take corrective action where needed.

### **Training**

The Company is committed to ensuring that its employees, directors and officers have access to, and understand, its Employee Code of Conduct. The Company is continuing to develop and formalize consistent training in this area.

### **Assessing effectiveness**

Exco regularly reviews and audits its policies and procedures. While Exco has not yet adopted formal standalone metrics specifically designed to assess the effectiveness of its actions to prevent and reduce the risk of forced labour or child labour, it intends to continue enhancing its monitoring and evaluation processes in 2026 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: April 29, 2026

