

May 30, 2025

Modern Slavery Act Report

Introduction

Universal Fabricating Inc. (“Universal”) is a proudly Canadian-owned and operated company, headquartered in Kingsville, Ontario. Established in 2004 with a team of just two employees, Universal has since expanded to over 167 full-time permanent employees throughout Southern Ontario as of 2024. Our growth has been underpinned by a commitment to operational excellence, integrity, and corporate responsibility.

In alignment with the **Modern Slavery Act** and the requirements of **Bill S-211**, Universal affirms its strong commitment to combatting all forms of modern slavery, including forced labour, child labour, and human trafficking.

This report sets out the steps taken by **Universal Fabricating Inc.** during the Fiscal Year ended on 31st October 2024 to identify, prevent, and address risks associated with modern slavery. It also outlines our governance structure, risk assessment framework, training programs, and supplier engagement practices designed to promote ethical sourcing and safeguard human rights. Universal remains committed to continuous improvement and transparency in our efforts to uphold the highest standards of ethical conduct and legal compliance in every aspect of our business.

Our Supply Chain

Universal is a specialized provider of custom metal fabrication and assembly solutions, serving a diverse range of industries including, but not limited to, automotive, airport infrastructure, and controlled environment agriculture (greenhouses). Our primary markets are in **Canada** and the **United States of America**, where we are recognized for delivering high-quality, engineered products tailored to our clients' specifications.

Our operations rely on a global supply chain that encompasses the procurement of raw materials, fabricated components, and specialized parts from a variety of international sources. These include suppliers and manufacturers located in **Canada, China, the United States, the Netherlands, Portugal, and India**. We acknowledge that supply chain risks—particularly those related to **forced labour** and **child labour**—vary significantly depending on the jurisdiction and socio-economic context of each region.

In recognition of these risks, **Universal** is currently enhancing its **due diligence procedures** and **Supplier Code of Conduct** to more effectively identify, assess, and mitigate human rights abuses and labour exploitation within our value chain. These enhancements are part of our broader commitment to ethical sourcing, responsible business conduct, and compliance with legislative requirements such as **Bill S-211** and international human rights standards. By strengthening our governance framework and risk mitigation practices, we aim to ensure that all suppliers meet our expectations for ethical labour practices, transparency, and respect for fundamental human rights.

Completed Steps

Universal has implemented the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

1. **Whistleblowing policy** - **Universal** encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organization. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. **Universal's** whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
2. **Employee code of conduct** - **Universal's** code makes clear to employees the actions and behaviour expected of them when representing the organization. The organization strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Ongoing Steps

As part of our ongoing commitment to ethical sourcing and compliance with modern slavery legislation, **Universal** has initiated work to begin mapping our supply chain. This exercise is intended to provide a clearer understanding of where risks related to modern slavery and human trafficking may be present—whether by product category or geographic location. We are also in the process of integrating risk assessment protocols into our supplier onboarding procedures to ensure that new suppliers are evaluated for indicators of forced or child labour prior to engagement. As this framework matures, we intend to regularly review all aspects of our supply chain using updated mapping data to identify and monitor areas of elevated risk.

We are currently developing a cross-functional approach involving Human Resources, Health and Safety, Procurement, and Sales to support supplier risk assessments and audits. These audits are being designed to apply a heightened level of scrutiny to suppliers operating in regions or sectors that pose greater risks. Additionally, we are working toward creating an annual risk profile for each supplier to inform our due diligence efforts and guide engagement strategies. These enhancements are expected to strengthen our ability to identify potential issues early and respond with appropriate risk mitigation actions.

We are also in the process of evaluating ethical sourcing databases that will allow us to vet suppliers based on labour standards and overall compliance performance. As we formalize our enforcement mechanisms, we intend to implement a framework that includes corrective action plans and, where necessary, sanctions for suppliers that fail to address identified risks or that breach our Supplier Code of Conduct—up to and including termination of the business relationship. These efforts reflect our commitment to continuous improvement and responsible business practices.

Conclusion

Universal remains steadfast in its commitment to upholding the highest standards of ethical conduct and legal compliance across all aspects of our operations and supply chains. While many of our initiatives to address the risks of modern slavery and human trafficking are still in development, we view this work as a critical and ongoing responsibility. We recognize that meaningful progress requires a structured, transparent, and collaborative approach—one that integrates due diligence, continuous improvement, and stakeholder engagement.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, 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 year listed above.

I have the authority to bind Universal Fabricating Inc.

Neil Harms

President

Universal Fabricating Inc.