

Modern Slavery Report

Introduction

This statement sets out Universal Fabricating's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2025.

As part of the fabrication industry, Universal Fabricating recognizes that it has a responsibility to take a robust approach to slavery and human trafficking.

The organization is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

1. Organizational structure, activities, and supply chains

This statement covers the activities of Universal Fabricating:

- We are a custom metal fabricator that provides solutions to both automotive and greenhouse industries.
- Universal Fabricating has been in business for 21 years and currently employs over 200 people full-time in Southern Ontario.

Countries/regions of operation and supply

The organization currently operates in the following countries/regions:

- Canada
- United States of America

2. Policies and due diligence processes in relation to forced labour and child labour

- Policies:** The organization operates 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:
 - **Whistleblowing policy** The organization 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. The organization's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of

retaliation. Employees, customers, or others who have concerns can complete our confidential disclosure form.

- **Employee code of conduct** The organization'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.
- **Social and Environmental Compliance Policy** The organization is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organization works with suppliers to ensure that they meet the standards of the policy. Serious violations of the organization's supplier policy will lead to the termination of the business relationship. New suppliers will need to complete a robust supplier assessment questionnaire to enable us to identify their commitments and processes to prevent unethical behaviour in their employment and supply chain processes.

b. Due diligence processes:

The organization is undertaking due diligence when considering taking on new suppliers and regularly reviewing its existing suppliers. The organization's due diligence and reviews include:

- Working with procurement to map the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through a combined effort of the human resources department, health and safety committee, quality and procurement and sales departments, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- identifying and participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular through reliable and informed sources.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

3. Risk Management

The company recognizes that there is increased risk in two areas of its operation for forced labour or child labour. These high-risk areas are identified in:

- Procurement
- Staffing

To address these areas, Universal Fabricating engaged in supply chain mapping to highlight areas of increased risk. The organization did not find an unparallel risk in its supply chain but did introduce a comprehensive supplier assessment questionnaire to mitigate the risks even further.

To address the risk in staffing, Universal Fabricating engages in fair and legal hiring process and provides training on modern slavery annually through various training methods.

4. Remediation

Upon review of the 2025 fiscal year, the organization identified no instances of involvement in forced labour or child labour. Additionally, there was no evidence to suggest that any measures undertaken to prevent the use of forced or child labour resulted in a loss of income for vulnerable families. As a result, no circumstances arose that required remediation.

The training provided to employees on forced labour and child labour:

Universal Fabricating requires all full-time staff, contractor agencies, supply chain managers and HR professionals within the organization to complete training on modern slavery as part of our annual health and safety training.

Universal Fabricating will require all senior level management, procurement and sales departments and the HR departments to undergo specific training for their area of expertise before the end of the 2026 year.

The organization's modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organization;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organization should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organization's supply chains.

Assessment:

Universal Fabricating will assess the effectiveness of this training by conducting periodic geographic mapping on our supply chain and conducting periodic reviews with suppliers either digitally or in-person.

Continued monitoring of engagement between our suppliers and the company on requested SAQ's regarding the Modern Slavery Act.

100% participation rates in fulfilling all full-time employee and contractor training regarding child/forced labour.

Approval

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.

Neil Harms

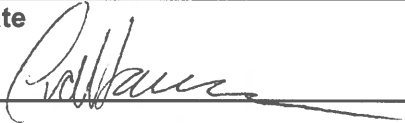
Full name

President

Title

February 26, 2026

Date



I have the authority to bind "Universal Fabricating"