



innovation inside

BILL S-211 - Fighting Against Forced Labour and Child Labour in Supply Chains Act and Customs Tariff amendment.

Modern Slavery Statement for the Financial Year ended May 2024

This statement is made pursuant to Bill S-211, 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 Ultra Manufacturing Limited dba as Mitchell Plastics to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing June 1, 2023 and ending May 31, 2024.

Social responsibility is an inescapable element of the long-term success of our company, just as it is for our stakeholders, business partners, employees and our customers. A plan for true sustainability requires not only good global citizenship but that we remain competitive in the long term. True social responsibility is not an obstacle but an enabler to this end. The following principles are followed by our company and our Suppliers worldwide. This documentation of Corporate Social Responsibility beliefs and expectations notifies every organization and individual in our Supply Chain that they must share in the adherence to these practices.

Group Structure

Ultra Manufacturing Limited was established in 1997. In 2001 there was a corporate amalgamation with Mitchell Plastics. The corporate head office is located in Kitchener Ontario, Canada with approximately 2800 employees with 1250 in Canada.

Company Locations

Ultra Manufacturing Limited, Waterloo ON Canada

Ultra Manufacturing Limited dba Mitchell Plastics, Kitchener ON Canada

Ultra Manufacturing Limited USA, Sterling Heights MI USA

Ultra Manufacturing Limited USA dba Mitchell Plastics, Charlestown IN USA

Ultra Manufacturing Limited USA dba Mitchell Plastics, Huntsville AL USA

Ultra Manufacturing S.A. de C.V., Queretaro MX

Ultra Manufacturing S.A. de C.V., Saltillo MX

Supply Chain

To produce automotive components manufactured in our North American facilities, Mitchell Plastics utilizes supply chains in North America, Asia and Europe.

Risks in Supply Chain

Our Corporate Social Responsibility Expectation is that all companies not only exist in a physical space but they also exist in communities of people. As such, all companies must understand and manage their impact on the communities they work in. In order to manage this impact, it is recommended that suppliers develop and implement a corporate social responsibility position that is communicated throughout their organization.

The identified risk in our supply chain is our overseas vendors. These include goods purchased from the following countries; China and Thailand.

Actions Taken

We support the effective abolition of exploitative child labour. Suppliers will not employ individuals in violation of local mandatory school age or under the legal employment age in each country where they operate. In no case will suppliers employ non-family workers under the age of 15.

We condemn all forms of forced and compulsory labour. Suppliers will not use forced or involuntary labour, whether bonded, prison or indentured, including debt servitude.

We will work against corruption in all its forms. We strictly adhere to all local and applicable local laws and regulations related to corruption and ethics, and require its suppliers to act in a similar manner.

During the onboarding of new Suppliers, we will use our Risk Assessment to ensure forced labour and child labour is not used within the new Suppliers supply chain as well as at their facility. The Risk Assessment is completed yearly by our Suppliers and managed by our Corporate Supplier Quality Liaison.

Mitchell Plastics is a member of the Automotive Parts Manufacturers' Association (APMA). The APMA is Canada's national association representing OEM producers of parts, equipment, tools, supplies, advanced technology and services for the worldwide automotive industry.

The APMA's fundamental objective is to promote the original equipment automotive supply manufacturing industry both domestically and internationally. Our mission is to strengthen and promote a globally competitive Canadian automotive supply chain. The APMA and its members work to strengthen the supply chain, drive collaboration across the industry and are a central partner in building our country's economic future.

Risk Assessment

One of the policies in place at Mitchell Plastics is our Risk Assessment, we have added the question "We require each Supplier to confirm that there is no Forced Labour and Child Labour used in the Supply Chain supporting Mitchell Plastics." The Risk Assessment is used during program launches to determine if a Supplier meets all of Mitchell Plastics requirements. These include our Supplier Quality Manual which now includes the below addition along with Corporate Social Responsibility Expectations.

21. COMPLIANCE WITH LAWS

A. Seller shall comply with all applicable laws, rules, regulations, orders, conventions, or standards enacted by the United States of America, and any other applicable jurisdiction, that regulate the manufacture, labeling, transportation, licensing, approval or certification of Supplies, including but not limited to, those relating to environmental matters, data protection and privacy, wages, hours and conditions of employment, subcontractor selections, discrimination, occupational health/safety and motor vehicle safety, including the Fighting Against Forced Labour and Child Labour in Supply Chains Act, Canadian Bill S-211. Each Purchase Order shall be deemed to incorporate by reference all the clauses required by the provisions of said laws, Purchase Orders, rules, regulations and ordinances.

The actions taken include on site audits, along with our annual questionnaire to the Supply Chain that presents the highest risk.

Remediation

Remediation is considered not applicable.

Remediation of loss of income, no measures have been taken in this area.

Training

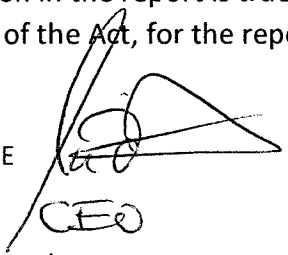
Training sessions are mandatory and is entity wide, all employees are required to complete training sessions. The training covers Mitchell Plastics policies regarding Human Rights, including forced labour.

Effectiveness Assessment

No actions have been taken to assess the effectiveness in preventing and reducing risks of forced labour and child labour in our supply chain.

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.

SIGNATURE

A handwritten signature in black ink, appearing to be 'C. E. O.', written over a horizontal line.

"I have the authority to bind Mitchell Plastics"

Title:

CEO

Date:

May 13, 2024