

Modern Slavery Report



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This report, compiled for the purpose of meeting the legal requirements in section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (The Act), is a joint report filed by TS Tech Canada Inc. on behalf of itself and Trimont Manufacturing Inc. for the fiscal year ending on March 31, 2025.

TS TECH Group understands that all business activities, ranging from product development, procurement, manufacturing, logistics and sales, have a potential to affect human rights. We recognize the importance of human rights from the perspectives of those who may be impacted by these activities.

We value and respect human rights as expressed in the International Bill of Human Rights which includes The Universal Declaration of Human Rights and the core labour standards from ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work. In addition, with our aim to help contribute to an all-inclusive society where no one is left behind, we strive to adopt these practices in our business activities by endorsing the United Nations Guiding Principles on Business and Human Rights.

Furthermore, we comply with the laws and regulations of respective countries and regions where we conduct our business. If the local laws and regulations have conflicts with the internationally recognized human rights, we will pursue ways to respect the internationally recognized human rights to the greatest extent possible.

TS TECH Group positions 'Initiatives for Respecting Human Rights', as one of our key management issues as can be seen within the TS Philosophy. The TS Philosophy acts as a driver for TS Tech Policies and Guidelines including, but not limited to, the TS Code of Conduct and the TS Tech Supplier Sustainability Guidelines.



Section 2 of the TS Code of Conduct identifies the TS Tech Group's stance on Human Rights and Work Environment.

“TS Tech respects human rights, does not practice discrimination, strives for equal opportunities in employment, and does not accept any form of child labour or forced labour. In addition, we strive to create a friendly and welcoming workplace where everyone can find fulfillment in their work.”

The *TS Tech Supplier Sustainability Guidelines* (July, 2021), is intended to share and promote our views on sustainability with our suppliers. We ask all suppliers to comply with those guidelines, which outline requirements in the following five categories:

1. Safety and Quality
2. Human Rights and Labour
3. The Environment
4. Compliance
5. Information Disclosure

Specific to this report, Section 4.2 of the TS Tech 'Supplier Sustainability Guidelines' (Guidelines by Category, Human Rights and Labour) has been included below.

1) No discrimination

Do not discriminate based on race ethnicity, national origin, religion, sex, disability, age, or other such characteristic in any aspect of employment*

*Hiring, employment, promotion, wages, termination, assignment of tasks, discipline, etc.

2) Respect human rights

Do not tolerate any type of harassment in the workplace based on race, ethnicity, nationality, religion, sex, disability, age, or other such characteristic.

3) No child labour

Do not allow any labour by children below the legal working age in each country and region.

4) No forced labour

Do not use any forced labour. Ensure that all labour is voluntary and that all employees are able to resign from their jobs at will.

5) Wages

Comply with the laws and regulations of the country and region in question concerning minimum wages, overtime, payroll deductions, payment based on output, and other wage-related issues.

6) Work hours

Comply with the laws and regulations of the country and region in question concerning decisions on employee work hours (including overtime), the granting of holidays and annual paid leave, and other such issues.

7) Communication and discussion with employees

Engage in communication and discussion in good faith with your employees or their representatives. Do not infringe on the rights of employees to organize or not organize in accordance with the laws and regulations of the country and region in question.

8) Safe and healthy work environment

Take measures to prevent accidents and disasters before they happen, and make ensuring the safety and health of employees at work the number one priority.

9) Conflict minerals*

Perform due diligence on the use of conflict minerals in your supply chain. If you discover the use of a mineral of concern, take action to eliminate its use.

*Minerals originating in or near the Democratic Republic of the Congo that are used to fund armed forces or human rights violations in conflict zones.

The TS Policy as well as TS Code of Conduct, TS Tech Human Rights policy, Initiatives for Respecting Human Rights, and TS Tech Supplier Sustainability Guidelines can all be viewed in full on the TS Tech Group website www.tstech.co.jp.

In addition to the Guidelines, we select particularly important suppliers using factors such as production reliability. We review the status of these suppliers' risk countermeasures and initiatives relating to the TS Tech Supplier Sustainability Guidelines and engage in joint initiatives with them to enhance the value of both TS Tech and those suppliers.

Through these guidelines, TS Tech aims not only to create a shared understanding with our suppliers but also to enact a proactive approach to sustainability in order for both us and our suppliers to exist in harmony with society, maintain continued growth, and be companies “sincerely appreciated by all” whose presence is valued by society.

In consideration of this goal, our request to our suppliers is;

1) Compliance with these guidelines

We ask that our suppliers follow these guidelines in addition to our master purchase and sales agreement that we sign with each supplier.

2) Reinforcement of internal systems

We ask that our suppliers develop, implement, and maintain internal systems to comply with any applicable laws, regulations, and norms. We also ask that our suppliers strengthen internal governance and internal audits to establish a corporate culture where laws, regulations, or norms do not get broken.

3) Dissemination throughout the supply chain

We ask our suppliers to share these sustainability guidelines, especially items related to compliance, with their suppliers, contractors, and entire supply chains.

4) Verification of compliance

If necessary, we may request the submission of relevant records and data or on-site reviews (at manufacturing plants) to confirm that our suppliers are in compliance with these guidelines.

5) Action when a compliance violation is found

In the event that a compliance violation is discovered in one of our supplier's business operations, we request that said supplier report the violation immediately to TS Tech, investigate the cause, and submit a report of the investigation and any measures to be taken to prevent similar violations from happening again.

All Associates receive training on the regional employment standards, TS Tech Philosophy, and TS Tech policies during orientation. More in depth training, including but not limited to, contracts and TS Tech's Social Responsibility Guidelines is provided as needed to the recruitment team and Associates who manage general and supplier changes. Associates are provided refreshers whenever the guidelines, standards, or policies are updated.

In 2024, TS Tech Canada and Trimont Manufacturing Inc. both completed individual Slavery and Trafficking Risk Templates. These templates identify areas of risk and countermeasures taken to reduce the risk level. It is anticipated that this template will be reviewed on an annual basis.

The TS Tech Group as a whole is committed to ensuring that forced labour and child labour are not used in its supply chains. We source materials from reputable suppliers who comply with labour laws and regulations.

TS Tech Canada Inc. and Trimont Manufacturing Inc. understand there is a heightened risk of forced labour when purchasing goods from outside of Canada. To mitigate this risk, all TS Tech Group suppliers are required to submit information detailing where their material is originating from, down to the raw material level. This allows for a check of regions of concern for forced labour to better determine the supplier's ability to meet the TS Tech Supplier Guidelines.

Neither TS Tech Canada nor Trimont Manufacturing Inc. has to date faced situations of forced labour or child labour and has therefore not had to remedy and rectify such situations.

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 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.

Kenji Nagai
TS Tech Canada Inc.
President
May 30, 2025



I have the authority to bind TS Tech Canada Inc.

Steven Li
Trimont Manufacturing Inc.
President
May 30, 2025



I have the authority to bind Trimont Manufacturing Inc.



**A COMPANY
SINCERELY
APPRECIATED BY
ALL**