

THE  
**NARMCO**  
GROUP

**Central**  
Stampings Limited

kapco  TOOL AND DIE LTD.

**PMP**  
PRINCE METAL PRODUCTS LTD.

**CEL**  
CANADIAN ELECTROCOATING LTD.

PRINCE METAL  
STAMPINGS  
USA INC.

**Russell**  
TOOL & DIE

**j.f.k.** SERVICES INC.

**Nartech**  
Metal Products Ltd.

**Nar**  
mx

**Nartech**  
Metal Products Ltd.

Plant 2 - Windsor

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## About this Report

This is a joint report, henceforth referred to as the “Report” made in accordance with subsection 11(2) of the Fighting Against Forced Labour and Child Labour Supply Chains Act, S.C. 2023 c.9 (the “Act”) and has been prepared on behalf of the Companies which comprise the Narmco Group.

The report aims to summarize the steps Narmco has taken in the financial year ended December 31<sup>st</sup>, 2024, to prevent and reduce the risk of forced labour and child labour within our operations and supply chain. The terms “we”, “our”, “us”, “Company”, and “NARMCO” used in this Report collectively refers to the companies which comprise the NARMCO Group.

Contact Us:

If you have any inquiries concerning this Report, please contact [CPadmin@narmco.com](mailto:CPadmin@narmco.com).

## 1. About the NARMCO Group

### 1.1. Our Structure and Activities

The NARMCO Group are privately held corporations, the majority of which are under the laws of the Province of Ontario, Canada. There is also a single company in the United States and a single company in Mexico. Corporate management is headquartered at 2575 Airport Road, Windsor, Ontario, Canada. N8W 1Z4.

We are an industry leader supplying high quality metal stampings, roll forming, e-coating, assemblies, and processes to the Automotive industry. As of the date of this Report, our global network includes 10 manufacturing operations, 2 tool and die operations, 1 automation and integration operation, and 1 research and development operation in 3 countries. We have a global team of over 2000 dedicated employees.

For a more in-depth description of NARMCO, more information can be found on our company website <https://www.narmco.com/>.

### 1.2. Our Supply Chain

NARMCO is a producer of automotive parts and assemblies for Original Equipment Manufacturers (OEMs) of vehicles. NARMCO, as a Tier1 automotive supplier sources various subcomponents from Tier 2 suppliers and other sub-suppliers, which we utilize in our products that we sell directly to OEMs. Due to the volume and complexity of the products we produce, NARMCO is part of a vast supply chain and deals with a multitude of different suppliers on a global scale.

Commented [RH1]: Are we counting each plant separate? (PMS 1, 2, 3)

Commented [JW2R1]: I think how it is will suffice. Also, I took out the third paragraph as it is redundant.

In 2024, we worked with approximately 4040 total active suppliers, 48 of which were steel suppliers, 80 of which were purchase part suppliers, 51 MRO suppliers and 221 independent contractors.

## 2. Our Policies and Processes to Combat Forced/Child Labour

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### 2.1. NARMCO's Values and Commitment to Respecting Human Rights

Respecting human rights is a fundamental part of our core company values and thus we recognize our responsibility to prevent forced/child labour and promote socially responsible business practices within our supply chain. NARMCO is committed to participating in legal and ethical business practices globally and seeks to comply with all applicable labour and human rights laws in all jurisdictions of operation.

At NARMCO, we hold all our employees to high ethical standards and thus expect the same level of commitment from our suppliers, vendors, consultants, independent contractors, and any other third party we conduct business with (collectively referred to as "suppliers"). We expect that all affiliated personnel of NARMCO and our suppliers will act with integrity and obey the letter and spirit of the laws, regulations, standards and NARMCO's policies that apply to them, regardless of where they conduct their business from. Failure by any of our suppliers to comply with our policy's terms can result in termination of NARMCO's business relationship within the supply chain.

### 2.2. Governance

NARMCO has various corporate functions that centrally manage policies and the implementation of activities aimed at social risks in general and forced/child labour in particular. These include the following departments/resources:

- Corporate Human Resources
- Corporate Purchasing
- Corporate Sales
- Corporate Counsel
- Whistleblower hotline

### 2.3. Our Policies Supporting Our Commitment

NARMCO maintains a policy framework that clearly and unequivocally prohibits forced/child labour, promotes socially responsible and ethical business practices, and is designed to protect

and recognize the fundamental human rights of workers as key stakeholders in our business. Since NARMCO operates in numerous jurisdictions with a range of different laws, our policy framework applies equally to all our operations across the globe to establish a common and consistent baseline for the fair treatment of our employees in addition to those in our supply chain. The policies supporting our commitment to protecting human rights are as follows:

Sustainability & Social Responsibility Guiding Principles ("Guiding Principles"):	Our Guiding Principles outlines our dedication to upholding sustainable and socially responsible business practices throughout our supply chain. Our policies regarding Forced and Child Labour are explicitly addressed in Section 3: Human Rights.
Supplier Self-Assessment:	Our Supplier Self-Assessment is a key document in our business relationship with our suppliers. The assessment requires our suppliers to have and enforce Human Rights policies and requires that our suppliers conduct their own assessment of their supply chain to assure there is no forced and/or child labour present in the supply network.
Supplier Code of Conduct: ("Supplier Code"):	Our Supplier Code is a foundational document for all our business relationships with our suppliers. The document outlines our expectations that our suppliers providing goods and services to NARMCO remain compliant with human rights laws, business ethics, and the environment, even in jurisdictions where meeting these standards are not considered part of the dominant business culture. These standards include prohibition of utilizing forced/child labour. Failure to comply with the Supplier Code can result in the termination of the business relationship with The NARMCO Group and its subsidiaries.
NARMCO Standard Terms and Conditions ("NARMCO's TAC"):	NAMRCO's TAC are sent out to all new suppliers as part of our New Vendor Package and states that all suppliers are required to comply with our Guiding Principles as detailed above.
Vendor Information Procedure:	Our internal Vendor Information Procedure is overseen by our Corporate Purchasing department and lists the requirements for approval of working with new vendors. This includes the necessity of the Supplier Self-Assessment, C-TPAT, and Guiding Principles amongst other documents to be filled out and renewed in a timely fashion when applicable.

Human Rights and Working Conditions:	Our Human Rights and Working Conditions policy states that NARMCO will not engage in the use of children under 15 years of age in any of their business operations. NARMCO also recognizes that workers under 18 years of age may be employed under strict conditions. Moreover, NARMCO will not engage in forced labour, or any entity supply forced labour as defined by ILO Convention 29.
Code of Ethical Behaviour ("Code of Ethics")	Our internal Code of Ethics is circulated to all of our employees as part of our onboarding process. This document outlines NARMCO's expectation that all employees and associated personnel remain compliant with relevant labour laws and respect human rights.
Human Rights Policy	The Human Rights Policy sent out to all our suppliers highlights NARMCO's commitment to removing forced and/or child labour from the supply chain stating that we will not conduct a business relationship with suppliers who participate in such practices, regardless of if their local law allows it. Failure to remain compliant with these policies will result in termination of the business relationship with that supplier.
HR Onboarding Orientation Checklist	As part of the Onboarding process, employees are given a checklist of all the policies and procedures they must understand. This includes NARMCO's Human Rights and Code of Ethics policies.
New Hire Orientation Policy	Our New Hire Orientation policy is circulated to all new employees at NARMCO by the Human Resources Department stating that each employee will be trained in various policies and procedures including policies relating to Human Rights and Working Conditions.
CTPAT	We comply with the security requirements of CTPAT certification which includes having processes to ensure that our goods are not mined, produced or manufactured, wholly or in part, with prohibited forms of labor, i.e., forced, imprisoned, indentured, or indentured child labor.

Commented [RH3]: Is this considered a policy or statement? Would using statement here make more sense?

Commented [JW4R3]: Keep policy

Our local employee policy manuals reflect local hiring policies and practices that prohibit both forced and child labour and contain policies assuring we remain compliant with local labour and

employment law such as minimum age policies, policies on the legal and ethical employment of young workers, and policies regarding hours of work and overtime practices. These policies also address the company's prohibition of harassment, discrimination, and workplace violence and harassment.

In addition to the above, in 2024, NARMCO requires all suppliers to complete our Supplier Questionnaire for Identifying Forced/Child Labour Risks, which will be assessed annually.

#### 2.4. Forced/Child Labour Within the Supply Chain and Actions Taken to Prevent and Reduce Risk

We believe that the risk of forced/child labour is minimal within our operations because of our commitment to compliance with legislation and supplier vetting and our compliance focused values, including our philosophy of fairness and equal opportunities amongst our employees and respect for the inherent rights of all workers.

We monitor our suppliers to ensure they remain compliant with our policies through various methods such as our monthly supplier score cards. Our suppliers are not located in identified areas of forced/child labour use.

We cross-check categories we have identified against the U.S. Department of Labour List of Goods Produced by Child Labor or Forced Labor and its List of Products Produced by Forced or Indentured Child Labor, as well as the high-priority sectors identified by the U.S. Department of Homeland Security's Forced Labor Enforcement Task Force.

Knowledge gained from these risk assessment measures and through other sources such as our global whistleblower Hotline (described below) are continuously incorporated into our risk identification process to improve our due diligence processes.

Commented [RH5]: Copied from Magna's report, need to fix up according to what applies to us.

#### 2.5. Due Diligence Processes and Actions Taken to Prevent Forced/Child Labour Risk

In 2024, NARMCO has taken the following steps to prevent and reduce the risk of forced or child labour being used at any point in the production of goods in Canada or elsewhere by NARMCO or of goods imported into Canada by NARMCO:

- Implementation of Supplier questionnaires specific to risks of forced or child labour
- Ensuring compliance with supplier requirements in the Supplier Code of Conduct.
- Yearly updates of information from suppliers.

#### 2.6. Procedures for Reporting Concerns

NARMCO strictly prohibits all forms against retaliation against individuals who report any illegal activities or ethical concerns in a truthful and good-faith manner, as outlined in our

Whistle Blower Protection policy (which can be found [here](#)). All complaints made will be treated in accordance with relevant local data protection laws.

## 2.7. Employee Awareness and Training

To inform and aid our employees in understanding the values, standards, and principles of the NARMCO Group, we have implemented various onboarding documents overseen by the Corporate Human Resources Department. This consists of training our employees on various topics relating to compliance and ethics as outlined in our internal New Hire Orientation policy and Onboarding and Orientation Checklist. Within this training, office-based employees are required to complete training and understand the policies set forth in NARMCO's Code of Conduct and other subtopics set forth by the Code.

## 3. Assessing the Effectiveness of Our Policies and Procedures

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We are dedicated to continuously improving our commitment to upholding human rights and continue to assess ways to refine and improve our policies and procedures. We regularly evaluate our activities to confirm that they remain current and aligned with regulations, industry standards and best practices. We assess the effectiveness of our activities with respect to forced/child labour in various ways including random spot audits of our suppliers.

## 4. Remediation Measures

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If we discover the use of forced/child labour in our supply chain we will work with the supplier to rectify the situation. If the suppliers do not comply, we end our relationship with that supplier and, if necessary, advise local authorities of any breaches.

## 5. Approval and Attestation

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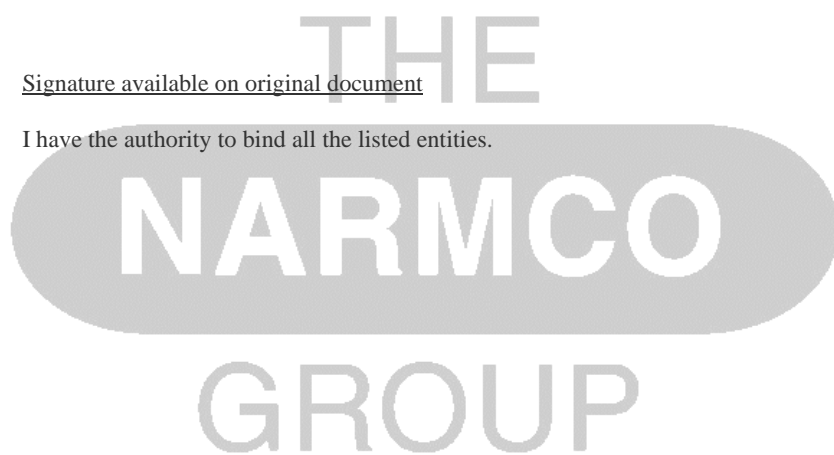
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed in attached Appendix A. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Director of Operations and General Counsel

- May 1, 2025

Signature available on original document

I have the authority to bind all the listed entities.



## Appendix A

### Reporting Entities Covered By this Joint Report

- Canadian Electrocoating Ltd.
- Central Stampings Ltd.
- Prince Metal Products Ltd.
- Nartech Metal Products Ltd.
- Kapco Tool & Die Ltd.
- Russel Tool & Die Ltd.
- JFK Systems Inc.
- Marentette Services Group
- Prince Metal Stampings USA Inc.
- Narmx Queretaro SA de CV

