

## **Report on Modern Slavery**

This joint report (the "Report") has been prepared by Creation Technologies Inc. and its wholly owned subsidiary Creation Technologies Ltd. (collectively "Creation Technologies" or the "Company") for the reporting year of January 1, 2024, to December 31, 2024, pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") and the *California Transparency in Supply Chains Act*.

Creation Technologies takes its role as a responsible global corporate citizen seriously. We are dedicated to preventing incidents of slavery and human trafficking from happening within our global operations and supply chain. We acknowledge that slavery and human trafficking can occur in many forms such as forced labor, child labor, domestic servitude, sex trafficking and workplace abuse. Therefore, throughout this Report we use the term "modern slavery" to encompass these various forms of coerced labor.

We adhere to all relevant labor and employment laws, regulations, and standards, while actively working to minimize the potential for modern slavery within our global business operations and supply chains. Creation Technologies does not knowingly use child labor or forced labor in any of its operations nor do we knowingly accept components or raw materials from suppliers that employ, or use forced labor or child labor.

### **A. Organization Structure, Operations and Supply Chains**

Creation Technologies is a leading global provider of comprehensive electronics manufacturing solutions, design services, and supply-chain and after-market solutions. We provide these offerings on a contract manufacturing basis primarily to original equipment manufacturers in the following industries: tech industrial, medical and life sciences, and aerospace and defense.

Creation Technologies Inc., a Delaware corporation, is headquartered in Boston, Massachusetts, employs approximately 3,000 employees and operates 12 manufacturing facilities through its wholly owned subsidiaries in Canada, the United States, Mexico and China. Creation Technologies Inc. also operates a design and prototyping center and global materials sourcing groups. Our Canadian manufacturing activities are conducted through Creation Technologies Ltd., a wholly owned subsidiary of Creation Technologies Inc., which employs approximately 890 employees in Canada.

On behalf of our customers, we procure large quantities of diverse electronics components and raw materials, including printed circuit boards and electronic components, from approximately 1,900 preferred and/or customer-directed manufacturers and authorized distributors in 23 countries worldwide. In certain instances, we obtain components from independent distributors and brokers. Many of these materials are specific to designed assemblies. In addition to electronics components, we may also source non-electronic components such as plastics, metal fabrications and various hardware from suppliers. Our dedicated global supply chain management team administers the commercial relationships with all suppliers on terms and conditions that are in accordance with our policies and procedures, including those discussed herein. Our global spend on raw materials and components in 2024 was approximately US\$482 million.

Additional information about Creation Technologies can be found at [www.creationtech.com](http://www.creationtech.com).

## **B. Policies, Processes and Due Diligence in relation to Modern Slavery**

Creation Technologies addresses modern slavery risks to its business and operations through specific policies and procedures, training, awareness, and due diligence.

In 2024, we continued to strengthen our policies and implementation frameworks across high-risk supply chain regions and expanded supplier engagement.

### Policies

Our policies in relation to human rights and modern slavery have been developed based on international human rights standards, as well as best practices from across the global business community. These policies establish our baseline expectations as well as communicate our values and promote trust in our business to all stakeholders. Specific policies include:

- **Code of Conduct:** Creation Technologies' Code of Ethics and Business Conduct (the "Code of Conduct") sets forth the fundamental values and standards of behavior that are expected in all aspect of our business. The Code of Conduct explicitly prohibits the Company and its business partners from engaging in, or condoning, modern slavery. In 2024 we implemented a certification process requiring all employees and executives to certify annually that they have reviewed, and agree to adhere to, the Code of Conduct.
- **Supplier Code of Conduct:** Creation Technologies is committed to sourcing responsibly and considers all activities in its supply chains that lead to human rights abuses as unacceptable. We require our suppliers to accept and adhere to the values and standards contained in our Supplier Code of Conduct, including the expectation that the supplier will comply with the requirements of the Supplier Code through its own operations and within its supply chains. Contracts with our suppliers require compliance with the Supplier Code of Conduct, which we maintain the right to monitor.
- **Policy Against Human Trafficking, Forced Labor and Child Labor:** Our Policy Against Human Trafficking, Forced Labor and Child Labor aligns with our commitment to protecting human rights by prohibiting modern slavery within our global operations and supply chain.
- **Anti-Bribery and Anti-Corruption Policy:** Creation Technologies' Anti-Bribery and Anti-Corruption Policy reinforces the understanding and expectation that employees and business partners must act ethically and with integrity in carrying on our business activities.

### Due Diligence and Supplier Verification

Creation Technologies has established a due diligence procedure for evaluating risks in its supply chain network. We employ a third-party due diligence screener that investigates counterparties for a wide variety of risks, including any adverse media reports related to modern slavery. Initial and ongoing monitoring identifies risks like modern slavery, sanctions, government restrictive lists and other violations across numerous jurisdictions. High-risk issues affecting Creation Technologies are escalated to internal stakeholders for additional scrutiny, and corrective actions are tracked until completion.

In 2024, we focused the use of adverse media tracking to the high-risk tier of our supplier base. To support this, Creation Technologies conducted geographic mapping to identify suppliers located in regions with an elevated risk of modern slavery. This mapping was informed by publicly available data, including government advisories and statistics on customs-held shipments suspected of being linked to forced labor. Suppliers operating in these high-risk regions are subject to enhanced due diligence measures, including initial screening and ongoing monitoring for adverse media, sanctions listings, or other risk indicators.

Additionally, our suppliers must comply with Creation Technologies' standard supplier contract terms and conditions, which require suppliers to comply with all applicable laws in the countries in which they do business and the Creation Technologies' Supplier Code of Conduct.

#### Governance and Management Oversight

Creation Technologies has established structures and roles responsible for overseeing the ethical conduct of our global business and operations.

Our Board of Directors oversees and monitors our approach, policies and practices related to environmental, social and governance matters ("ESG"), including the human rights of workers affected by our operations. The Board of Directors has delegated the administration of Creation's ESG program to the ESG Steering Committee, which oversees and guides our ESG initiatives.

Our VP of Supply Chain is responsible for the day-to-day oversight of Creation's policies and practices related to supply chain risk, and our Legal and Human Resources departments serve as the first point of contact for managing suspected breaches of all Creation Technologies policies and laws, including those related to employment, labour and human rights.

#### Audit and Certification

Currently, Creation Technologies does not require its suppliers to certify that all materials incorporated into our products were produced in a manner than complies with applicable laws relating to modern slavery, nor does it conduct audits on its suppliers to ensure compliance with such laws.

#### Reporting

Creation Technologies has also adopted a Whistleblower Policy that establishes a set of guidelines and procedures to protect individuals who report unethical or illegal activities within the Company or its business partners, including modern slavery, ensuring confidentiality, non-retaliation, and appropriate investigation of reported concerns. This policy is supported by an ethics (telephone/email) hotline that is available 24 hours a day to our global workforce and supply chain network to anonymously report any incidents or concerns related to modern slavery or other violations of policies or the Code of Conduct.

#### Recruitment and Employment Practices

Creation Technologies hires employees directly and conducts independent due diligence and checks on those employees, in compliance with our policies.

### **C. Risks of Modern Slavery in Creation Technologies' Supply Chains**

While Creation Technologies is not aware of any products or materials in our supply chain that are at high risk of involving modern slavery, the Company nonetheless acknowledges the potential risks for modern slavery within elements of its supply chain network, which includes various tiers of direct and indirect suppliers. As noted, we source components and raw materials from approximately 1,900 manufacturers and authorized distributors in 23 countries worldwide, with the majority of electronics components originally from Asian countries.

Modern slavery risks within the global supply chain include region-specific risks, such as countries with vulnerable demographics, substantial migrant worker populations, limited enforcement of employment laws, common practices of charging recruitment fees to workers, or documented instances of prevalent modern slavery.

We also acknowledge that understanding the risks of modern slavery in our supply chains is critical to focusing our actions, efforts and engagement with our supply chain. To do so requires identifying and prioritizing the most key risks associated with our operations and commercial relationships.

Creation Technologies is committed to improving and expanding its understanding of the risks in our supply chain. This may include further mapping our supply chains and seeking additional feedback from key stakeholders such as our employees, customers, suppliers, manufacturers and distributors and impacted communities. We continue to identify areas that can be improved to enhance the detection and prevention of modern slavery in our operations and supply chain network.

### **D. Remediation Measures and Remediation of Loss of Income**

No situations related to modern slavery have arisen that have required remediation by the Company. While no instances of modern slavery were identified in 2024, we continued to develop internal response protocols in the event remediation is necessary in the future.

### **E. Accountability and Training**

The Code of Conduct applies to officers, directors, and employees of Creation Technologies. Creation Technologies provides mandatory regular training to all employees on our Code of Conduct, which contains the content regarding modern slavery, and other policies and topics related to ethics and legal obligations. All employees must know, understand, and follow the Code of Conduct as well as policies referenced in it, which includes the Policy Against Human Trafficking, Forced Labor and Child Labor.

### **F. Assessing Effectiveness**

Creation Technologies has implemented measures noted herein to prevent modern slavery in its operations and supply chains. Creation Technologies commits to continuously monitor and enhance its efforts in combating these issues, aiming for continual improvement in its practices.

Activities related to assessing the effectiveness of our measures include, reviewing and updating policies and procedures on a regular basis, tracking employee training during onboarding, tracking reports and corrective actions made on the ethics hotline, and monitoring adverse media reports related to risks of modern slavery in our supply chains.

#### **G. Approval and Attestation**

This report has been approved by the Board of Directors of Creation Technologies. 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.

Signed on May 1, 2025, by

  
Patrick Freytag  
Chief Executive Officer

I have the authority to bind Creation Technologies Inc. and Creation Technologies Ltd.