

MARTINREA INTERNATIONAL INC.



**Annual Report on the Fighting Against Forced Labour and
Child Labour in Supply Chains
May 2025**

1. INTRODUCTION

Martinrea International Inc.'s ("Martinrea") Slavery and Human Trafficking Report (the "Report") is made in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). This Report covers the financial year from January 1, 2024 – December 31, 2024, and sets out the steps Martinrea and its subsidiaries have taken to address the risk of child labour and forced labour taking place within their own operations and supply chain.

2. ABOUT MARTINREA INTERNATIONAL INC.

2.1. OUR STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Martinrea operates as a diversified and global automotive supplier engaged in designing, developing and manufacturing highly engineered, value-added Lightweight Structures and Propulsion Systems, primarily focused on the automotive sector. Martinrea employs approximately 19,000 skilled team members in 56 locations (including sales and engineering centers) in Canada, the United States, Mexico, Brazil, Germany, Spain, South Africa, Slovakia, China and Japan. The corporate head office is located in Vaughan, Ontario, Canada, with the main sales and research and development (R&D) technical center in Auburn Hills, Michigan, USA and sales and engineering offices in Japan and Germany.

Martinrea manufactures a variety of Lightweight Structures, including body-in-white (BIW) and chassis components, subframes, knuckles, control arms and links, engine cradles, battery trays, and exterior trim products.

Martinrea's Propulsion Systems offerings include engine blocks, transmission and electric motor housings, and fluid and thermal products such as brake lines, fuel lines, fuel fillers, and thermal management systems. Martinrea also has a Flexible Manufacturing Group (FMG) that produces automotive assemblies and components for industrial customers.

Martinrea is primarily a Tier One supplier to original equipment manufacturers ("OEMs") in the automotive sector. Companies that supply components, assemblies, modules or systems directly to OEMs, and which design, engineer, manufacture and conduct performance validation and quality control testing, are referred to in the automotive industry as "Tier One" suppliers. Tier One suppliers generally supply these components, assemblies, modules or systems to OEMs on a just-in-time sequential basis, which enables OEMs to reduce inventory levels. In producing components, assemblies, modules or systems for OEMs, Tier One suppliers may rely on other suppliers (referred to as "Tier Two" suppliers), for the supply of input components or parts. Tier Two suppliers and their suppliers (referred to as "Tier Three" suppliers) generally have specific technical or engineering skills or a niche product that the Tier One supplier would purchase for inclusion in an overall product for sale to an OEM.

2.2 OUR VISION AND CULTURE

Martinrea's vision for the future is: Making Lives Better by being the best supplier we can be in the products we make and the services we provide. Martinrea's mission is Making People's Lives Better by: (i) delivering outstanding quality products and services to our customers; (ii) providing meaningful

opportunity, job satisfaction and job security for our people; (iii) providing superior long-term investment returns to our stakeholders; and (iv) being positive contributors to our communities. Martinrea's vision and mission is based on four key pillars: having a high-performance culture, operational excellence, superior financial management and customer satisfaction. This has internally become known as Martinrea 2.0: a four-pillar strategy to create a framework to become a great company with diverse people and groups working together to be One Company.

Martinrea believes a great culture is core to a sustainable business and successful company. Martinrea's culture of entrepreneurship, lean manufacturing principles, and the Golden Rule philosophy can be represented as follows:



Our human rights policies are an extension of our Golden Rule culture.

For more information, please refer to Martinrea's Annual Information Form for the year ended December 31, 2024, which can be found on www.martinrea.com or www.sedarplus.ca.

3. MARTINREA'S POLICIES AND DUE DILIGENCE PROCESSES TO PREVENT FORCED/CHILD LABOUR

3.1. MARTINREA'S VALUES AND COMMITMENT TO RESPECTING HUMAN RIGHTS

Martinrea's approach to human rights aligns with our vision of Making Lives Better and our Golden Rule culture. Martinrea condones forced labour and child labour and respects the rights of children. Martinrea's Sustainability Policy and its Human Rights Policy set forth our values regarding human rights, including child labour, forced labour, human trafficking, modern slavery, diversity and inclusion, freedom of association, collective bargaining, safe work environment, working hours and wages and benefits. Our policies align with the United Nations Universal Declaration of Human Rights and additional guidance contained within the International Bill of Rights. Our Sustainability Policy and Human Rights Policy applies globally, including all our worldwide subsidiaries, affiliates, partnerships, ventures and other business associations that Martinrea controls. All our employees are subject to these policies. Martinrea believes

in compensating employees to help them to meet their basic needs, while providing them the opportunity to improve their skills and abilities to enhance their social and economic opportunities. Martinrea rejects all forms of physical, sexual, psychological or verbal abuse of its employees. Our suppliers, contractors and other business partners with whom we do business are also expected to adhere to our standards, including human rights and labour practices.

Martinrea's commitment to protecting and respecting human rights is embodied in the Human Rights Policy, Sustainability Policy and Conflict Mineral Policy, which address key workplace issues commonly associated with modern slavery, including but not limited to child labor, forced labor, human trafficking, fair and equal wages, and freedom of association and collective bargaining rights.

Martinrea's policies and Supplier Code of Conduct and Ethics prohibit forced or compulsory labour and require our business, including all suppliers to comply with ethical recruitment principles (for example, not using misleading or fraudulent practices while offering employment, or confiscating, destroying, concealing, and/or denying access to employee identity documents).

3.2. MARTINREA'S KEY POLICIES AND TRAINING

3.2.1. EMPLOYEE BILL OF RIGHTS AND 10 GUIDING PRINCIPLES

In pursuing its vision and mission, Martinrea developed, on a collaborative basis, a set of guiding principles to be communicated, reinforced and adopted throughout Martinrea on a consistent basis as follows:

1. The Golden Rule - Treat everyone with dignity and respect
2. We make great, high-quality products
3. Every location must be a center of excellence
4. Discipline and ownership are key
5. We strive for greatness
6. We are a diverse and inclusive team
7. Challenges make us better
8. Think different
9. Work hard, play hard
10. Leave it better

In addition to our 10 Guiding Principles, Martinrea adopted an Employee Bill of Rights in 2001, still relevant today, as follows:

- **Job Security:** Every employee is an important member of the Martinrea team. Together, we build our future and protect our job security – exceeding customer expectations while remaining competitive within our industry.
- **Health and Safety:** Our employees work in a safe, healthy environment and an ergonomically friendly workplace.
- **Fair Treatment:** Our employees shall be treated with dignity and respect. Accordingly, we provide equal opportunities in a workplace free from discrimination and harassment.
- **Compensation:** Our wages and benefit programs are reviewed annually to ensure that employees receive fair compensation for our industry and the communities in which they live.
- **Coaching:** Regular feedback will be provided so our employees know where they stand at all times and can build on their strengths.

- Training: Employees shall be provided the opportunity to develop to their full potential through ongoing training and continuous learning.
- Communication: We believe in open, honest two-way communication supported by visible, responsible action in a timely manner.
- Open Door Policy: If any employee feels his or her rights under the Martinrea Employee Bill of Rights are not being met or if they have any questions, concerns or suggestions, they are encouraged to approach any member of the management team up to and including the CEO. Our doors are always open. We promise to listen and respond appropriately without reprisal or retaliation.

3.2.2. EMPLOYEE TRAINING AND SUBCOMMITTEES

In addition to our rolling out and cascading the 'Child Labor Call to Action' training provided by General Motors to our sourcing teams and temporary labour agencies, Martinrea has delivered several important training modules to employees including Global Trade Compliance Training, Martinrea Corporate Policies Training, Supply Chain Operations Policies and Procedures, and Sustainability Awareness Training in 2024 which included training on promoting respect and business ethics and proper reporting procedures.

Fair treatment, and dignity and respect are core principles in the Employee Bill of Rights and 10 Guiding Principles. These principles, which are discussed and reinforced through monthly employee meetings, Martinrea News (publication provided for employees), Global Leadership Conference, training and in daily life, also encourage diversity.

To further support our most important resource, our employees, we developed an ERG Steering Committee to manage the implementation of ERGs throughout the Company and create plans to develop these groups as resources for our employees continuously. ERGs serve different individuals based on their needs and passions (or interests), including MindsMatter (mental health support), W@M (Women's Resource Group) and YoPro (Young Professionals).

Martinrea also has a Global Diversity Steering Committee with subcommittees such as Awareness and Engagement, Opportunities in Manufacturing, Mentorship Programs and Employee Resource Groups (ERGs), among others. The Committee meets regularly on initiatives and engages in planning activities and team members work to increase diversity, equity and inclusion awareness and engagement, implement training and maintain compliance.

3.2.3. CONFLICT MINERALS POLICY

Martinrea's Conflict Minerals Policy provides a general overview of our commitment to ethical and socially responsible business practices and recognizes responsibility to promote the protection of human rights. Martinrea completes conflict mineral reporting as we determine necessary to help ensure conflict minerals such as gold, tantalum, tungsten and tin, as well as cobalt and mica, sourced from mines under the control of armed groups in the Democratic Republic of Congo and certain neighboring countries, are not used in our automotive parts and assemblies.

This Policy plays an important role in Martinrea's commitment to source components and materials from companies that act in an ethical and environmentally responsible manner.

Martinrea strives to have a conflict-free supply chain and is committed to working with its suppliers to increase transparency regarding the origin of minerals in its products. Suppliers we determine to be "high-

risk potential” will be audited by Martinrea to reduce risk within the supply chain. Failure to meet our standards may result in the termination by Martinrea of the supplier relationship.

We report annually to our customers, where required, on supply chain due diligence and use our International Materials Data System (IMDS) and the Responsible Minerals Initiative (RMI) to perform due diligence queries of our supply chain

3.3 SUPPLIER DUE DILIGENCE – SUPPLIER CODE OF CONDUCT AND ETHICS

In addition to supporting human rights within Martinrea’s own operations, Martinrea is committed to ensuring its suppliers do the same. We require our supply chain to adhere to our Supplier Code of Conduct and Ethics, which articulates our fair enterprise culture and serves as a general endorsement of the human rights and international labour standards reflected in the United Nations Universal Declaration of Human Rights, International Labour Organization (“ILO”) Fundamental Conventions, and ILO Declaration on Fundamental Principles and Rights at Work. Our Supplier Code of Conduct and Ethics reflects an express and unequivocal prohibition on the use of forced or child labour.

Our Supplier Code of Conduct and Ethics is an integral part of our supplier package, which emphasizes the importance of maintaining global working conditions and standards for the dignified and respectful treatment of all employees within all our global operating locations, as well as those of our supply chain. Suppliers are expected to respect internationally recognized human rights. A failure by any of our suppliers to comply with the Supplier Code of Conduct and Ethics may result in the termination by Martinrea of the supplier relationship.

With respect to third-party service providers and staffing agencies, we maintain a number of oversight and due diligence practices to ensure that contingent workers are subject to the same ethical standards applicable to Martinrea’s regular full-time employees. There is increased global legislation mandating due diligence of supply chains. To help comply with laws across different jurisdictions in which we operate, we conduct risk assessments as we determine necessary as a part of our broader enterprise risk management systems. The assessments help to identify, avoid and address related financial risks and opportunities to key business areas, human rights issues, environmental issues and economic impacts. We continue to monitor compliance with the emerging supply chain regulations that apply to our operations and our supply chain. No production suppliers or temporary staffing/labour agencies were terminated in 2024 as a result of a violation of working conditions or human rights.

Martinrea’s Supplier Code of Conduct and Ethics outlines the principles we set at Martinrea, as well as our expectations for every company that supplies goods or services to Martinrea, relating to, but not limited to:

- Responsible sourcing of materials
- Respect for human rights such as forced and child labour
- Employee health and safety
- Promotion of diversity and inclusion
- Privacy and cybersecurity
- Prohibitions against counterfeit parts
- Environmental protection
- Global trade compliance (export, import and sanctions)
- Ethical business conduct, such as compliance with antitrust/competition, anti-corruption laws

- Integrity of financial reporting and financial controls, protection of intellectual property
- Data security and cybersecurity protection

Martinrea expects the standards set out in the Supplier Code of Conduct and Ethics to be met by all of our suppliers, even in jurisdictions where meeting such standards may not be considered part of the common business culture. We communicate to suppliers Martinrea determines to be applicable that we require their suppliers to abide by the principles of the Supplier Code of Conduct and Ethics as well. Martinrea reserves the right to audit a supplier's compliance with the Supplier Code of Conduct and Ethics. We conduct limited audits, as needed, on suppliers identified to be potentially high risk. Failure to meet our standards detailed within the Supplier Code of Conduct and Ethics may result in the termination by Martinrea of the supply relationship. This makes our expectations clear and demonstrates how seriously we take our position on ethical standards. The Supplier Code of Conduct and Ethics resides on our website under the Suppliers webpage on www.martinrea.com. Martinrea also requests an annual supplier self-assessment from our production supplier partners, which includes questions related to sustainability and code of conduct. These assessments aid in our determination of high-risk suppliers and identification of the best suppliers for collaboration.

When assessing a supplier, our areas of concern include:

- The sector or industry it operates in
- The types of products it produces, sells, distributes or imports
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour

In 2024, Martinrea has further strengthened its risk assessment processes by incorporating a third-party risk analytical tool for supplier intelligence, due diligence, and third-party risk mitigation specifically targeting direct material suppliers. This tool evaluates suppliers based on various risk factors including geographic location, industry sector, ownership structure, and adverse media mentions pertaining to business practices. The implementation of this tool complements our existing measures outlined in this Report, and we successfully screened 100% of new suppliers in 2024.

Martinrea has determined that the risk of forced, or child labour may occur with services providers of temporary staffing or within certain countries or areas where there is a heightened risk of forced labour or child labour that Martinrea sources products or services. Martinrea conducts internal assessments as it determines applicable, and takes steps it considers applicable, including as described in this report.

3.4 REPORTING MEASURE

We have policies for employees to safely communicate suspected violations of the Code of Conduct and the Employee Bill of Rights. We maintain a confidential and anonymous whistle-blowing line, administered by a third party and available for employees and any other stakeholders (including customers and suppliers) to make submissions.

The anonymous hotline is used to report violations, specifically illegal business practices or potential human rights violations. All reports cascade to Martinrea leadership, allowing any risks to be immediately addressed, strengthening our corporate governance.

4. ASSESSING EFFECTIVENESS AND REMEDIATION

4.1. ASSESSING EFFECTIVENESS OF OUR ACTIONS

Martinrea is dedicated to improving its approach to human rights and regularly assesses ways to refine its programs and policies. Martinrea employs a cross-functional team with multi-purpose processes to evaluate the effectiveness of its due diligence systems and efforts to address human rights issues, including those related to responsible sourcing of materials.

As detailed in this Report, Martinrea has implemented numerous measures to prevent and minimize the risk that forced labour or child labour is used in our operations and supply chains. We maintain internal and external accountability, holding Martinrea employees and suppliers accountable to the standards on human trafficking set out in our policies and standards.

We assess the effectiveness of our measures with respect to forced or child labour in a number of ways including (1) conducting risk assessments, as a part of our broader enterprise risk management systems, to identify, avoid and address human rights issues, environmental issues and economic impacts, (2) monitoring compliance with existing and emerging supply chain regulations that apply to our operations and our supply chain, (3) implementing feedback from our regular and risk-based audits such as our annual employee surveys and internal audit programs, (4) regularly assessing supplier questionnaires and/or audits, and (5) monitoring reports received through the reporting mechanisms described in this Report including Martinrea Hotline.

4.2. REMEDIATION MEASURES

Martinrea is committed to providing appropriate remediation in cases where we identify that we have caused or contributed to adverse human rights impacts. Our remediation framework includes:

- A formal investigation process for all reported violations
- Engagement with affected individuals or communities to understand impacts
- Development of corrective action plans with clear timelines and responsibilities
- Monitoring of remediation implementation and effectiveness
- Collaboration with relevant stakeholders including suppliers, and government agencies when appropriate

During this reporting period, no instances of forced labor or child labor within our operations and supply chains have been identified or reported. Consequently, no specific remediation actions related to these issues were required. We remain vigilant and prepared to implement our remediation framework should any issues arise.

5. APPROVAL AND ATTESTATION:

This Report was approved pursuant to section 11(4)(b)(ii) of the Act by Martinrea's Board of Directors. 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.

Per: 

Name: Rob Wildeboer
Title: Executive Chairman
Martinrea International Inc.
Date: May 1, 2025