Heico 2004 Member, Inc., doing business as
Canada Metal Processing Group

Report submitted under the

Fighting against forced labour and child labour in supply chains act

Fiscal year ended December 31, 2025
Supply Chain Management

1. INTRODUCTION

This report is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") and concerns Heico 2004 Member, Inc., doing business as Canada Metal Processing Group ("MPG Canada") in its capacity as General Partner of Ifastgroupe 2004 L.P. (for its Infasco and Galvano divisions, and its subsidiary Infasco Nut L.P.), Ivaco Rolling Mills 2004 L.P. and Sivaco Wire Group 2004 L.P. (for its Sivaco Ontario and Sivaco Quebec divisions).

MPG Canada hereby reports to the Minister of Public Safety on the measures taken to prevent and mitigate the risk of the use of forced labour or child labour at any stage of the production of our goods, in Canada or elsewhere, or upon importation into Canada during our last fiscal year, which ended on December 31, 2025..

2. MEASURES TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR

Since the Act came into force, we have confirmed our standard terms and conditions of purchase in place in 2025 referenced the prohibition of forced labour and child labour both within our company and at our direct suppliers, as further described under section 4 B. of this report.

In addition, we have improved and standardized our vendor pre-qualification and onboarding process to include a more thorough assessment of the vendor's current forced labour and child labour policies. During this assessment, if the vendor does not have current policies in place, we work with them to ensure full compliance.

Following our preliminary supply chain mapping identifying high-risk vendors, we have confirmed with such vendors their compliance with the Act and made them aware of their obligations to conduct regular due diligence to ensure that the products supplied to MPG Canada do not contain the use of forced labour or child labour at any point in the supply chain.

Finally, we have continued to gather information within the supply chains of each of our business units to work closely with our vendors at higher risk of using or exposed to the use of forced labour and child labour.

3. STRUCTURE, BUSINESS ACTIVITIES AND SUPPLY CHAIN

Incorporated under the Canada Business Corporations Act (c. C-44), MPG Canada is a subsidiary of The Heico Companies ("Heico"). Heico is a holding company that owns and operates several businesses around the world, grouped under four platforms. MPG Canada is part of one of Heico's four platforms and operates in the steel sector, specifically in the production, processing and distribution of steel products. including carbon and alloy steel billets, carbon and alloy steel wire rod, carbon and alloy steel wire, carbon and alloy steel bolts and nuts, and other steel fasteners.

MPG Canada's head office is located in L'Orignal, Ontario, and MPG Canada operating companies all have a place of business in Quebec and/or Ontario. In total, MPG Canada currently employs approximately 1400 people, 100% of whom are in Canada.

MPG Canada operates three companies spread over six manufacturing sites in Quebec and Ontario: Ivaco Rolling Mills (L'Orignal, ON), Sivaco Wire Group (Marieville, QC - Ingersoll, ON) and Ifastgroupe (with divisions in Marieville, QC and Saint-Mathieu-de-Beloeil, QC and a subsidiary in Mississauga, ON).

The vast majority of MPG Canada's purchases from direct suppliers of goods and services are from Canada, with a proportion of around 85%. In addition to goods and services from Canada, around 10% of purchases originate from the United States. A small proportion of purchases of goods and services come from direct suppliers in countries like China, India, Taiwan, South Korea, Ecuador and Brazil.

4. POLICIES AND DUE DILIGENCE PROCESSES RELATED TO FORCED LABOUR AND CHILD LABOUR

As per the Heico Code of Conduct, our long-term success as a company depends on many factors, including strategic vision, inspired leadership, customer-centric innovation, and world-class products and services. Our success also depends on our reputation in the market for honesty, integrity and corporate citizenship. Our reputation for integrity is – and must always be – the cornerstone of our business. Our ethical standards, which go far beyond the minimum legal requirements, reflect and define us as a company and as individuals.

Regardless of the circumstances, we require our business partners and others stakeholders who act on our behalf to meet the same high standards. Such commitment inspires confidence in our trading partners, shows them that we share common goals and builds long-term, mutually beneficial relationships of trust.

A. Code of Conduct

Heico's Code of Conduct applies to MPG Canada. The Code of Conduct clarifies the mission, values and principles of Heico and its subsidiaries, and links them to a set of guidelines on how employees should act in the workplace, among themselves, with business partners and within the community. It is a reference point that informs employees of the procedures to follow to make sound business decisions and, if necessary, the actions to be taken in the event of non-compliance. This Code of Conduct contains a section on human rights, as follows:

> *"We are committed to compliance with human rights laws as they re-late to our businesses, including those against slavery, human traffick-ing, and child labor. We strive to work with business partners who have practices consistent with this Code."*

More specifically in the Human Rights Policy, the following sections are included:

> **Prohibition of Forced Labor, Modern Slavery, and Human Trafficking**
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> *"Heico strictly prohibits all forms of modern slavery, human trafficking, forced labor, involuntary servitude, and prison labor not permitted by law. This prohibition applies to all Heico operations and extends to our business partners, suppliers, and contractors."*

Child Labor and Young Workers

"Heico prohibits the use of child labor and will not employ individuals be-low the applicable legal minimum working age. Where lawfully aged young workers are employed, Heico expects compliance with applica-ble laws regarding working hours, job restrictions, and workplace pro-tections."

Upon hiring a new employee, and annually thereafter, every employee must read and attest the Code of Conduct. In addition, and on an annual basis, mandatory training, in the form of a webinar, accompanies the update of the Code of Conduct. This training is mandatory for all employees, and participation and completion rates are rigorously monitored by Heico's senior management. Finally, in addition to being shared via internal communication forums (emails, intranet), this Code of Conduct is available on the website of each of MPG Canada's operating companies, allowing any external collaborator to learn more about the values and principles that are the basis of our employees' conduct.

Our employees are required to report any violation or suspected violation of our Code of Conduct, policies, or applicable laws. In addition, to strengthen our culture of integrity and compliance, we encourage employees to express themselves freely, and as such, they can access Heico's toll-free hotline to report a situation they have observed and that is of concern to them. In countries that allow it, the use of this hotline can be done anonymously.

B. Terms and Conditions of Purchase

The Terms and Conditions of Purchase, the standard terms for all operating companies of MPG Canada, govern our contractual relationships with our direct suppliers of goods and services and include a clause of compliance with applicable laws. The Business Partner Code of Conduct is defined in the Terms and Conditions of Purchase as part of the applicable laws with which our direct suppliers must comply. The Business Partner Code of Conduct specifically refers to forced labour and child labour, as more fully described in Section "C" below.

The Terms and Conditions of Purchase are published on the website of each of our operating companies. The counterparty bound by the Terms and Conditions of Purchase, acknowledges and confirms that it has read the Business Partner Code of Conduct, it agrees to fulfill its contractual obligations in accordance with this Code and it agrees not to do anything that could result in a violation of this Code by MPG Canada.

C. Business Partner Code of Conduct

The Business Partner Code of Conduct sets forth the ethical principles and standards that we expect from sales agents, distributors, resellers, consultants, service providers, purchasing agents, and other direct suppliers of goods and services ("Business Partners"). MPG Canada requires all Business Partners to train their employees to understand and comply with this Code. Business Part-ners are further advised that any violation of this Code may jeopardize the busi-ness relationship with MPG Canada.

The Business Partner Code of Conduct contains the following clause:

Human rights

"We are committed to treating our employees, customers and each of our Business Partners with dignity and respect for human rights as defined in the United Nations Declaration of Human Rights. We expect each of our Business Partners to put in place controls that:

- *Prohibit child labour, forced or compulsory labour and human trafficking."*

D. Direct Supplier Selection Process

Before being selected by MPG Canada, each direct supplier must go through a well-established selection process. This process allows us to ensure that our direct suppliers can provide high-quality services and goods while meeting human rights standards, amongst other criteria. All of MPG Canada's operating companies follows the same pre-selection and supplier selection process. In addition to screening each potential supplier in an automated restricted parties and global trade compliance software, the pre-selection and supplier selection form that needs to be completed includes a section on forced and child labour, requesting the supplier to share its active forced labour and child labour policies. Should the supplier not have such policies in place, it is required to provide a detailed justification and a plan to ensure forced labour or child labour is not used in its operations and within its supply chain.

In addition, any supplier of raw materials used in the production of our steel billets is required to complete an acknowledgement of compliance form. In this form, the supplier is asked to confirm that it does not use forced labour or child labour in the production of any product supplied to Ivaco Rolling Mills or any raw materials or intermediate products used in the production of any final product supplied to Ivaco Rolling Mills. The completed form must be signed and returned to Ivaco Rolling Mills prior to the commencement of the performance of any contract..

5. AREAS OF MPG CANADA'S BUSINESS OPERATIONS AND SUPPLY CHAINS THAT INVOLVE A RISK OF FORCED OR CHILD LABOUR AND MEASURES TO ASSESS AND MANAGE THAT RISK

A. Within the organization

- Within our operations for our MPG Canada employees, we believe that the risk of the use of forced labour or child labour in our operations is extremely low for the following reasons:

- Recruitment processes ensure compliance with the standards in Can-ada, where one hundred percent (100%) of our personnel is established.

- Once employed by MPG Canada, our employees are provided with at least the benefits and rights provided for by the laws and regulations in force in Canada; some of MPG Canada's policies provide for a higher standard in certain respects.

- MPG Canada also recognizes the right of its employees to freedom of association. Of the proportion of employees who work in Canada, ap-proximately seventy percent (70%) are covered by a collective bargaining agreement that ensures compliance with the terms and conditions of employment negotiated by labour groups and thus helps to exclude the risk of forced labour or child labour.

B. Within our supply chains

MPG Canada recognizes that the risk of forced labour and child labour exists, particularly given that its supply chains, including those of its direct suppliers, extend to regions where the identified risk of forced labour and child labour is real. However, since the vast majority of MPG Canada purchases of goods and services continue to be within North America in the last reporting period, MPG Canada has not yet identified risk of forced labour and child labour within its supply chain, but continues to complete its full risk assessment process..

6. MEASURES TAKEN TO ADDRESS ANY USE OF FORCED LABOUR OR CHILD LABOUR

MPG Canada did not identify any cases of forced or child labour for the fiscal year ended December 31, 2025. As a result, no measures have been implemented to address them.

7. MEASURES TAKEN TO ADDRESS THE INCOME LOSSES OF THE MOST VULNERABLE FAMILIES CAUSED BY ANY MEASURES TO ELIMINATE THE USE OF FORCED LABOUR OR CHILD LABOUR IN MPG CANADA'S OPERATIONS AND SUPPLY CHAINS

Given the absence of identified impacts for the fiscal year ended December 31, 2025, no measures have been implemented in this area.

8. TRAINING EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

For the fiscal year that ended December 31, 2025, our employees received mandatory training on the Code of Conduct, which addressed ethical issues in general and a specific section of which reiterated our commitment to respect human rights laws in the course of our activities, including those against slavery, trafficking in persons and child labour.

9. EVALUATION OF THE EFFECTIVENESS OF EFFORTS TO AVOID THE USE OF FORCED LABOUR AND CHILD LABOUR

No action was taken during the fiscal year ended December 31, 2025, MPG Canada has yet to completely assess the effectiveness of measures implemented for preventing and reducing the risks of forced labour and child labour in MPG Canada's operations and supply chains.

APPROVAL AND ATTESTATION

This report is for the 2025 fiscal year (January 1st, 2025, to December 31st, 2025) and is published pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act). It constitutes Heico 2004 Member, Inc., doing business as MPG Canada's joint report under the Act.

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 MPG Canada.

Based on my knowledge, and having exercised due diligence, I attest that the information in the report is true, accurate and complete in all respects material for the purposes of the Act, for the reporting year listed above. Signed on this 26th day of May, 2026.

Francis Miner

Director, Supply Chain and Government Affairs at Heico 2004 Member, Inc., and on behalf of its subsidiaries Ifastgroupe 2004 L.P., Ivaco Rolling Mills 2004 L.P., Sivaco Wire Group 2004 L.P.