



MARMEN

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Report on Forced Labour

2023

**manufacturing
forward**

1. Introduction

This report is prepared by Marmen Inc. (“Marmen,” “the Company,” “our,” “we,” or “us”) for the fiscal year ending December 31, 2023 (the “Reference Period”). It details the actions taken to prevent and reduce the risk of forced labour or child labour at every level of the goods and services supply chain, both in Canada and abroad. This is the first report prepared by the Company pursuant to the new Canadian legislation *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

2. Measures taken to prevent and reduce the risk of forced labour and child labour

Respect for human rights is a fundamental pillar of Marmen’s corporate responsibility and a guiding value for all its actions. Marmen is committed to respecting human rights in all its operations and expects the same rigour from its business partners.

During the Reference Period, Marmen implemented the following measures to address and mitigate the risk of forced labour or child labour within our company and our supply chains:

- Marmen reviewed all of its internal policies to examine more specifically the framework for forced labour and child labour, both in its factories and supply chains.
- Marmen has required that all its suppliers comply with the *Code of Conduct – Suppliers* prohibiting the use of forced labour and child labour.
- Marmen conducted an initial assessment of the risks associated with forced labour or child labour in its supply chains.

3. Structure, activities and supply chains

Marmen is a family-owned business that was founded in 1972 and incorporated under the *Business Corporations Act* (Quebec). The group of companies that Marmen is a part of has more than 1,000 employees in Canada and the United States, with over 550 Marmen employees working at its head office and factories located in Trois-Rivières (Quebec, Canada). Marmen provides fabrication, high-precision machining, surface

treatment, wind tower fabrication, mechanical and electrical assembly, and design & engineering services. Marmen Énergie Inc. is an affiliate of Marmen and is also incorporated under the *Business Corporations Act* (Quebec), but is not a “Reporting Entity” within the meaning of the Act. Marmen Énergie Inc. has a plant in Matane (Quebec, Canada) that manufactures wind towers. In addition, U.S. affiliates of Marmen operate wind energy companies in the United States, including a plant in Brandon, South Dakota, as well as aerospace and defense companies.

Marmen has international expertise in high-precision machining, fabrication, mechanical assembly, design and engineering. The Company is a highly recognized manufacturing partner of major OEMs and is one of the largest manufacturers of wind towers in North America.

For more than 50 years, Marmen has served many sectors, including aviation, oil and gas, hydropower, steam and gas turbines, mining and steel mills, wind power, nuclear power, infrastructure, space, defense and military.

Marmen’s mission is to provide innovative manufacturing services and expertise, to be a driving force in ambitious and challenging projects, and to build the world’s industrial future.

4. Policies, governance and due diligence process

As part of its commitment to protect human rights, Marmen has developed a number of policies for its suppliers worldwide, as well as internal policies for all its employees.

4.1. Code of Conduct – Suppliers

To achieve its business ethics vision, Marmen has implemented a *Code of Conduct – Suppliers* that applies to all its suppliers, since it is essential for Marmen that all its suppliers adopt ethical and responsible conduct, and Marmen does not tolerate any exceptions in this regard.

Marmen’s *Code of Conduct – Suppliers* explicitly states that suppliers are prohibited from using child labour and forced labour:

“Marmen’s Code of Conduct – Suppliers defines the key principles that are required. It sets out Marmen’s commitments and expectations of its suppliers.

1. EQUITABLE WORKING CONDITIONS

[...]

- **Human rights:** *respect the rights, personal dignity and privacy of each individual.*

Do not tolerate any child labour at any stage of your operations in accordance with applicable laws and regulations. Marmen considers the minimum ages for training programs and all other type of work to be 15 and 16 years, respectively;

Do not use any forced labour, including, without being limited to, prison labour, slavery and human trafficking.”

The complete *Code of Conduct – Suppliers* is available on Marmen’s website at <https://marmeninc.com/en/suppliers>.

4.1.1. Purchase orders

To ensure compliance with the *Code of Conduct – Suppliers*, Marmen adds the following to each purchase order it issues:

“COMPLIANCE WITH CODE OF CONDUCT

The supplier undertakes to read and comply with Marmen’s

Code of Conduct [...].”

4.2.2024 Employee Manual

Marmen's 2024 Employee Manual applies to all its employees. It includes a clause that directly addresses the prohibition of child labour:

"Marmen may at no time use child labour at its various facilities and shall comply with all laws related thereto. Child labour is governed by the Act Respecting Labour Standards. For example, the Act prohibits employers from having them perform work that is disproportionate to their abilities or that could compromise their education or harm their health or physical or moral development. In addition, the Act Respecting Occupational Health and Safety prohibits an employer from having work performed by a person who does not meet the minimum age set by the regulations adopted by the CNESST.

All temporary workers hired by Marmen and all workers employed by third parties working at our facilities must meet these child labour requirements."

A *Code of Conduct* is also included in the *Employee Manual*. In particular, it states that Marmen expects his employees to demonstrate exemplary behaviour in all their actions for and on behalf of Marmen.

5. Supply chains

Marmen actively deals with slightly over 3,400 suppliers in 31 countries. During the Reference Period, Marmen dealt with slightly over 1,000 different suppliers.

The vast majority of Marmen's suppliers are located in Canada, where the prevalence of modern slavery is low according to the *Walk Free Foundation's Global Slavery Index 2023*.

Several other Marmen suppliers come from countries with low prevalence of modern slavery, according to the *Global Slavery Index 2023*, such as the United Kingdom, Germany, France, England, Denmark, Switzerland, Sweden, Australia and Japan.

Marmen purchases certain goods and services from a small number of suppliers located in countries where the prevalence of modern slavery is average to high, according to the *Global Slavery Index 2023*. Marmen is aware that there is a greater risk of forced labour and child labour in these parts of its supply chains.

In an attempt to mitigate such risks, Marmen requires all its suppliers to comply with the *Supplier Code of Conduct*, which prohibits all forms of forced labour and child labour, as

mentioned in the previous section. Each Marmen purchase order includes this commitment in order to make regular reminders.

6. Mitigation and remediation measures

Marmen's *Code of Conduct – Suppliers* states that if an instance of non-compliance is detected, the Company may put in place a remedial plan to correct the situation or terminate the contract with the supplier in the event of a serious breach.

Similarly, Marmen's *Code of Conduct* in the *2024 Employee Manual* provides that sanctions may be applied in the event of unethical conduct on the part of an employee.

During the Reference Period, no forced labour or child labour situations were detected in the Marmen supply chain, and the Company received no reports of such practices. Therefore, no corrective action was required during this period. Should a situation of non-compliance be identified, Marmen commits to setting up an effective remedial plan to correct the situation promptly.

7. Assessment of effectiveness

To date, Marmen has not put in place any specific method to determine the effectiveness of the measures it implemented to reduce the risks of forced labour or child labour in its supply chains.

However, as its knowledge of these issues increases, Marmen undertakes to adjust its policies and prevention processes. Marmen plans to look at ways to assess the effectiveness of its future actions.

8. Training

During the Reference Period, no training on forced labour and child labour was provided to Marmen's employees.

Over the coming months, Marmen plans to explore the possibility of training some key supply sector employees on modern slavery, forced labour and child labour to educate and inform them about these issues.

9. Approval and certification

This statement applies to Marmen Inc. and has been approved by the latter's Board of Directors and signed by Marmen Inc.'s president and a member of its Board of Directors.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), and in particular section 11 of that Act, I hereby certify that I have reviewed the information contained in this report for the above-mentioned entity. To the best of my knowledge, and after due diligence, I confirm that the information contained in this report is true, accurate and complete in all material respects for the purposes of the Act, for the above-mentioned reference year.

I have the power to bind Marmen Inc.



Patrick Pellerin, President

May 15, 2024.