

2023 Fighting Against Forced and Child Labour Report

This document constitutes Focal Technologies Corporation's ("Moog Canada") report prepared pursuant to Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ended September 30, 2023, and outlines the steps taken by Moog Canada to prevent and reduce the risk that forced and child labour is used in the production of goods or of goods imported into Canada by Moog Canada.

Our Business, Structure and Activities

Moog Canada is a company registered in the Nova Scotia Registry of Joint Stock Companies. Moog Canada designs, manufactures, and sells robust slip rings and electronic components and service support to global oil & gas, renewable energy and defense markets. Moog Canada ended its fiscal year with 162 employees. It is a wholly owned subsidiary of Moog Inc. ("Moog"). Moog is a worldwide designer, manufacturer and integrator of precision motion control products and systems. Moog and its subsidiaries (collectively the "Moog Group"), including Moog Canada, are currently divided into four segment-based operating groups:

- 1. Military Aircraft;
- 2. Commercial Aircraft
- 3. Industrial; and
- 4. Space and Defense.

The primary activities of Moog Canada consist of selling, designing, procuring parts, incoming inspection of parts, assembly of final goods, final testing, in-house aftermarket repair and in-field installation and repair services, and all associated administrative tasks required to sell and support robust and high-quality final goods to global customers.

Our Supply Chain

Moog Canada's business provides products as well as in-factory and field-support services for installation and repair of Moog Canada products. In order to design, manufacture and support these goods and services, Moog Canada works with local and foreign suppliers (while meeting all applicable trade compliance obligations) who provide Moog Canada with machined parts, electronic components and subassemblies, fiber optics, rotary seals, connectors, wire and assorted hardware. Moog Canada will also procure, from time to time, contract engineering services to support product design. Although more than 85% of Moog Canada spend is with Canadian suppliers, procurement of goods and services from the United States and Western Europe is common. Moog Canada also has suppliers in China. Moog Canada therefore imports goods from a variety of suppliers with varying levels of risk with respect to child and forced labour. We are nonetheless committed to taking appropriate steps designed to prevent and reduce risk of forced and child labour in our supply chain. Our expectation is that all of our suppliers produce products in an ethical and socially responsible manner and that our suppliers do not use, or in any way benefit from, forced and child labour.

Forced and Child Labour Risks in Our Supply Chain

Moog Canada monitors regions and markets where child and forced labour are most prevalent and pays close attention to the portion of our supply chain in these areas. Such review reveals that the area of our supply chain most at risk is the supply of electronic components from Asia. Having knowledge of this risk allows us to focus our audit and review activities on electronic component suppliers that could be high risk. We are considering the option of utilizing an independent third party to perform audits on our behalf but did not employ an independent third-party auditor for such purposes in the prior financial year.

Our Approach

Policies and Due Diligence Processes

Moog Canada is subject to and benefits from the Moog Group's policies and due diligence processes. The policies and processes described below apply to Moog Canada. The Moog Group is committed to fair employment practices, including compliance with Modern Slavery laws, and has adopted this policy statement:

"Moog will not tolerate modern slavery in our global operations, nor engage in contracting or subcontracting with other entities that are engaged in modern slavery. We will endeavour to meet or exceed all regulatory requirements related to combating modern slavery adopted by the Government of the United States, as well as such similar requirements as are adopted by the respective governments of other states and countries where we do business."

We have a Modern Slavery Compliance Plan. Key elements of this Compliance Plan include:

- 1. Statement of Business Ethics: our Statement of Business Ethics reflects the above policy statement.
- 2. <u>Training / Internal Accountability:</u> our employees are trained in modern slavery laws to promote awareness and be provided with resources to escalate concerns if such prohibited activity becomes known to them. See below section on Training for more information on our training initiatives in respect of modern slavery. In a further attempt to increase employee awareness, each Moog Group location worldwide, including Canada, is posting employee awareness communications and hotline information for reporting of modern slavery concerns.
- 3. <u>Audit:</u> we include a contractual provision in our supply agreements requiring our suppliers to comply with modern slavery laws and allowing us to review and audit them periodically for such compliance; we do conduct supplier reviews but do not currently conduct these audits. Our supply chain is also contractually required to make us aware of any forced labour issues that become known regarding it or its own sub-tier suppliers and they are required to flow down such modern slavery provisions to sub-tier suppliers in applicable contracts. Lastly, we have the right to terminate supply contracts if modern slavery issues are found.
- 4. <u>Certification:</u> under contract, we have the ability to require suppliers to answer a questionnaire disclosing the details of their own modern slavery compliance programme. Whilst we do not currently seek such certification in the regular course of business, we have the contractual ability to require a certification from required suppliers that it has a modern slavery compliance plan in place.

We are not currently aware of any issues in our supply chain that would give rise to a violation of our Compliance Plan.

Remediation Measures and Remediation of Loss of Income

Violation Reporting Procedures, Whistleblowing & Investigation Support

We have procedures in place for reporting prohibited activities identified in modern slavery laws and will take appropriate remedial and referral actions if such activity is found. We have an "open door" policy which encourages employees to engage in open and candid discussions regarding our policy, or any violations, with their supervisors, managers, legal, human resources and senior management without reprisal. We also require our employees to report, without fear of retaliation, activity inconsistent with the policy prohibiting modern slavery on its confidential company-specific ethics hotline at 1-866-519-6330 or moogethics@moog.com. In addition, we will fully cooperate with any government agency conducting an audit or investigation of potential modern slavery violations, including providing timely responses and reasonable and required access to our employees, records and facilities.

We are not aware of any incidents of forced or child labour in our business or supply chain during the reporting period and have therefore not had to consider appropriate measures to respond to incidents of forced or child labour. We will nevertheless continue to act in accordance our policies and processes aimed at prohibiting the use of forced and child labour in our business and supply chains and respond accordingly if such incidents arise. As Moog Canada is not aware of any incidents of forced or child labour in its supply chain during the reporting period, the question of remediating the loss of income for vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour within its supply chain

has also not arisen.

Training

Moog Canada employees are trained in modern slavery laws to promote awareness and are provided with resources to escalate concerns if such prohibited activity becomes known to them. In 2017, Moog added training on modern slavery laws to its biannual training on its Statement of Business Ethics and gave more in depth modern slavery training to its supply chain personnel. In addition, upon hire, all new Moog Group associates receive this same training as part of our new associate orientation process. All such training reinforces that the consequences for employee violations of our modern slavery policy will result in disciplinary action up to, and including, termination. In a further attempt to increase employee awareness, each Moog Group location worldwide is posting employee awareness communications and hotline information for reporting of modern slavery concerns.

Assessing Our Effectiveness

To assess our effectiveness, we track and consider any complaints that come through our violation reporting and whistleblower procedures in respect of forced or child labour and monitor ongoing developments in respect of such risk as it relates to our business.

We will continue to review, reassess and further develop our approach to preventing and reducing child and forced labour in our supply chain.

Approval and Attestation

This report is approved and attested, as required under subsection 11(4)(a) and subsection 11(5) of the Act.

For any questions related to the foregoing, kindly contact Joseph Polniak at jpolniak@moog.com.

Respectfully Submitted,

Cruig Bowles

Craig Bowers

Director, Vice President & General Manager

June 2024

I have authority to bind Focal Technologies Corporation