

Modern Slavery and Supply Chain Transparency Report 2025

Reporting Period: January 1, 2025 – December 31, 2025



This Report is made by Chemelex LLC on behalf of itself and certain affiliated entities operating under the Chemelex brand that are under common ownership or common operational management (“Chemelex”, “the Company”, “we”, “our”).



This Report is intended to satisfy applicable reporting requirements under:

- Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act;
- the UK Modern Slavery Act 2015;
- the Australian Modern Slavery Act 2018 (Cth);
- California Transparency in Supply Chains Act

Chemelex is committed to conducting business ethically, responsibly, and with integrity throughout its operations and supply chain. We recognize the importance of protecting human rights and preventing forced labour, child labour, human trafficking, and other forms of modern slavery.

2025 represented a foundational transition year for Chemelex following its establishment as an independent organization after separating from its former parent company in early 2025. During this transition period, Chemelex continued operating within an established culture of ethics, compliance, supplier governance, and responsible business conduct while further formalizing elements of its standalone compliance, procurement, and ESG oversight programs.

Prior to separation, Chemelex operated under its former parent organization’s sustainability and responsible sourcing framework, which included EcoVadis Gold recognition. During 2025, Chemelex continued developing its independent supplier governance and sustainability processes, including future consideration of independent EcoVadis participation.

In preparing this Report, Chemelex consulted with relevant regional operations, procurement personnel, compliance functions, and operational leadership involved in supply chain governance and compliance activities.

1. ORGANIZATIONAL STRUCTURE AND OPERATIONS

Chemelex is a global provider of engineered electrical, thermal management, leak detection, and sensing solutions supporting critical infrastructure, industrial environments, data centers, and energy-related applications.

The Company operates across Canada, the United States, Europe, Asia, Australia, and other international markets.

Chemelex’s operations include manufacturing, engineering, product development, distribution, field installation and site services, and ongoing customer support and technical services.

The Company’s supply chain includes raw materials, fabricated components, electrical and industrial assemblies, logistics and transportation providers, contingent labour providers, and professional and operational service providers.

Chemelex utilizes centralized procurement and supplier onboarding systems, including SAP enterprise systems and the Ivalua supplier management platform, to support procurement governance and supplier oversight activities.

2. REPORTING SCOPE

This Report includes relevant entities operating under the Chemelex brand engaged in manufacturing, engineering, distribution, sales, service, procurement, or related operational activities in jurisdictions subject to applicable modern slavery and supply chain transparency legislation, including Chemelex Canada Ltd. and relevant affiliated entities operating in the United Kingdom and Australia.

3. GOVERNANCE AND ACCOUNTABILITY

CHEMELEX maintains governance frameworks and compliance processes intended to support ethical business conduct and responsible supply chain management.

Oversight responsibilities relating to ethics, compliance, human rights, responsible sourcing, and supply chain governance are managed collaboratively through the Company's leadership, Legal & Compliance functions, Strategic Sourcing team, procurement activities, and operational management processes.

CHEMELEX's governance approach is informed by recognized international human rights standards and broader enterprise compliance expectations applicable to the Company.

4. POLICIES AND STANDARDS

CHEMELEX's Code of Excellence establishes expectations regarding ethical conduct, compliance with laws, respect for human rights, workplace health and safety, integrity, accountability, and speaking up without fear of retaliation.

CHEMELEX utilizes a Supplier Code of Conduct that establishes expectations for suppliers regarding ethical business practices, human rights, forced labour prohibition, child labour prohibition, workplace health and safety, anti-discrimination practices, freedom of association, and compliance with applicable laws.

Suppliers are expected to prohibit forced, bonded, indentured, or involuntary labour, human trafficking, recruitment fees, passport confiscation, unreasonable movement restrictions, and unlawful disciplinary wage deductions.

5. RISK ASSESSMENT AND AREAS OF FOCUS

CHEMELEX applies a risk-based approach to supplier oversight and supply chain governance activities, considering factors including operational criticality, supplier profile, sourcing geography, labour intensity, and supply chain visibility.

The Company recognizes that modern slavery risks may exist within global supply chains, including upstream manufacturing environments and lower-tier supplier networks where visibility may be more limited.

As with many global supply chains, visibility into lower-tier suppliers may be more limited than direct supplier relationships.

CHEMELEX periodically reviews areas of its operations and supply chain that may present elevated exposure to modern slavery and related human rights risks, considering factors such as sourcing geography, operational criticality, supply chain visibility, and labour intensity.

Further details regarding selected areas of focus and examples of current activities are included in Appendix A – Risk Assessment and Areas of Focus.



6. DUE DILIGENCE AND SUPPLIER MANAGEMENT

Chemelex maintains supplier onboarding, supplier governance, and strategic sourcing processes intended to support responsible sourcing and ethical business conduct.

Supplier oversight activities are supported through dedicated supplier assessment resources located in both North America and China.

Supplier assessments are coordinated regionally:

- North American resources support assessments across North America and EMEAI regions; and
- China-based resources support supplier assessments within Asia-based supply chains.

Chemelex maintains a strategic supplier assessment program focused on suppliers considered operationally significant to the business.

The Company seeks to assess strategic suppliers on a periodic basis, generally targeting assessment coverage over a rolling five-year cycle.

During 2025:

- Chemelex completed 29 supplier assessments globally; and
- assessments were conducted for 12 of the Company's 35 identified strategic suppliers.

Supplier assessments included review areas such as management systems, workplace health and safety, operational and quality controls, supplier governance practices, business continuity, responsible labour expectations, and policy alignment activities.

Chemelex incorporates responsible sourcing, compliance, and human rights expectations into supplier onboarding documentation and contractual arrangements where appropriate.

Where appropriate, supplier assessment and onboarding activities may result in corrective actions or follow-up activities relating to supplier governance or documentation requirements. For example, during 2025 onboarding activities, a corrective action relating to supplier policy documentation was identified for a newly onboarded supplier and addressed through the supplier assessment process. No evidence of confirmed human rights violations, forced labour, or child labour was identified during these activities.



7. TRAINING AND AWARENESS

CHEMELEX provides employee onboarding, Code of Excellence training, compliance communications, and role-specific governance and compliance activities intended to reinforce ethical business conduct and responsible sourcing expectations.

8. REPORTING CONCERNS AND REMEDIATION

CHEMELEX encourages employees, suppliers, contractors, and other stakeholders to report concerns relating to ethics, compliance, workplace conduct, human rights, or suspected violations of law or policy.

Reporting channels may include confidential or anonymous reporting mechanisms where permitted by applicable law, and CHEMELEX prohibits retaliation against individuals who raise concerns in good faith.

During the reporting period:

- CHEMELEX did not identify any confirmed instances of forced labour or child labour within its operations or supply chain; and
- no remediation measures relating to forced labour or child labour were required.

Accordingly, no measures were necessary to remediate loss of income to vulnerable families resulting from efforts to eliminate forced labour or child labour.



9. ASSESSING EFFECTIVENESS

CHEMELEX assesses the effectiveness of its efforts through supplier assessment activities, periodic review cycles for strategic suppliers, corrective action tracking, supplier onboarding controls, ethics reporting mechanisms, and ongoing review of procurement and supplier governance processes.

During 2025, CHEMELEX completed 29 supplier assessments globally, including assessments of identified strategic suppliers, as part of its ongoing supplier oversight activities.

Based on the Company's policies, governance activities, supplier oversight processes, and operational controls, CHEMELEX believes the risk of forced labour and child labour within its direct operations is low.

10. CONTINUOUS IMPROVEMENT PRIORITIES

Following its establishment as an independent organization in 2025, CHEMELEX continued formalizing elements of its standalone governance, compliance, and supplier oversight processes.

Key areas of ongoing focus include:

- maintaining supplier assessment and due diligence activities;
- continued use of supplier onboarding controls through Ivalua;
- ongoing review of supplier governance and responsible sourcing processes; and
- continued evolution of CHEMELEX's independent sustainability and compliance activities, including future consideration of independent EcoVadis participation.

CHEMELEX remains committed to continuous improvement in the prevention and mitigation of forced labour and child labour risks throughout its operations and supply chain.



11. APPROVAL AND ATTESTATION

This Report was approved and signed by the Chief Executive Officer of Chemelex LLC pursuant to applicable reporting requirements under Canadian, UK, and Australian modern slavery legislation.

In accordance with the requirements of the applicable legislation, I attest that I have reviewed the information contained in this Report.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate, and complete in all material respects for the purposes of the applicable reporting requirements for the reporting year ended May 15, 2026.



A handwritten signature in black ink that reads "Dave Prystash" in a cursive, flowing script.

David Prystash
Chief Executive Officer
Chemelex LLC

Date: _____

APPENDIX A – RISK ASSESSMENT AND AREAS OF FOCUS

The following table summarizes selected areas of operational and supply chain focus considered during Chemelex’s ongoing review of modern slavery and related human rights risks, together with examples of current activities intended to support supplier oversight and responsible sourcing practices.

Area of Focus	Potential Exposure	Examples of Current Activities
Upstream manufacturing supply chain	Components, electrical materials, fabricated assemblies	Supplier onboarding processes, supplier assessments, and supplier expectations communicated through policies and contractual requirements
International sourcing jurisdictions	Suppliers operating in regions with elevated labour-rights risk	Regional supplier oversight and review activities
Contingent and contract labour	Temporary or third-party labour arrangements	Internal workplace standards and supplier expectations relating to ethical labour practices
Supplier onboarding and procurement	New vendors and indirect suppliers	Centralized onboarding processes supported through Ivalua and procurement oversight activities
Multi-tier supplier transparency	Reduced visibility into Tier 2 and lower-tier suppliers	Ongoing supplier engagement and periodic review activities

APPENDIX B – RELATED POLICIES AND STANDARDS

- Code of Excellence
- Supplier Code of Conduct
- Ethics Reporting Mechanisms
- Human Rights Principles
- Procurement and Supplier Governance Processes

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