

# Report on Preventing Forced Child Labor

**Reporting Period:** January 1, 2024 to December 31, 2024

## Reporting Entities

This joint report is prepared to address the requirements of the Fighting Against Force Labour and Child Labour in Supply Chains Act (Canada) for

- Means Industries, Inc. (Michigan)
- Transform Automotive, LLC (Delaware)
- Transform Automotive Canada Ltd

## Structure of the Reporting Entities

### **Amsted Industries, Inc.**

Amsted Industries is a global, diversified manufacturer of industrial components for primarily rail, commercial vehicle, automotive, and construction and building applications. With over a century of engineering and manufacturing excellence and a commitment to ongoing product and process improvement, our businesses are all leaders in the markets they serve.

**Amsted Automotive** was formed in 2021 when Means Industries Inc., Transform Automotive, SMW Manufacturing, and Burgess-Norton Mfg. Co., Inc. joined together to form a new and innovative technology team. The integration provides an expanded global presence with 21 facilities in North America, Europe, and Asia to serve the global automotive, off-highway and mining industries with a robust manufacturing footprint, producing over 100 million components and assemblies annually. The team combines design and engineering expertise, strategically aligned to be a leader in precision products and propulsion systems for electrified, hybrid and ICE propulsion platforms. Amsted Automotive plays an integral role in global automatic transmissions designed and manufactured in North America, Europe, and Asia.

**Means Industries, Inc.** was founded 1922 and is headquartered in Saginaw, Michigan. Means Industries designs, engineers and assembles clutch systems that improve efficiency, performance and packaging for transportation applications. Products such as mechanical diodes, selectable one-way clutches, e-axle disconnect solutions, electro-mechanical solutions and multi-function systems are utilized in hundreds of current production vehicle transmissions manufactured by nearly all of the largest automotive companies in the world for ICE, Hybrid and EV applications.

**Transform Automotive LLC** was founded in 1997 and in 2002 became owned by Means Industries. Transform Automotive is a global leader in advanced metal forming processes, delivering precision products through innovative engineering, patented processes and extensive metal forming capabilities. Products such as motor housings, disc carriers, clutch hubs, welded assemblies, brackets, planetary & differential carriers utilize flow-forming, hoop band, grob-forming and other stamping processes. These products can be found in many global ICE, Hybrid and EV applications. s

**Transform Automotive Canada Ltd** was founded in 2005 owned by Means Industries. Transform Automotive is a global leader in advanced metal forming processes, delivering precision products through innovative engineering, patented processes and extensive metal forming capabilities. Products such as motor housings, disc carriers, clutch hubs, welded assemblies, brackets, planetary & differential carriers utilize flow-forming, hoop band, grob-forming and other stamping processes. These products can be found in many global ICE, Hybrid and EV applications.

The reporting entities are Means Industries, Inc., Transform Automotive, LLC. and Transform Automotive Canada Ltd

## **Supply Chains**

Amsted Automotive's multi-tiered supply chain includes a global pool of suppliers to procure direct goods and services and materials to support the production of its products. The high majority of suppliers to Means Industries, Inc., and Transform Automotive, LLC suppliers are based in the United States where child labor laws greatly mitigate the risk of any illegal hiring practices. The Amsted Automotive Supplier Code of Conduct defines the expectations of the Amsted Automotive supply base and includes Labor and Human Rights, Business Ethics, EH&S and Financial Data Integrity.

## **SUPPLIER CODE OF CONDUCT**

Amsted Automotive and its business units and subsidiaries (collectively, "Amsted Automotive," or "Company") are committed to the highest standards of ethics and business conduct. This Supplier Code of Conduct (the "Code") sets forth our expectations for our entire community of product and service suppliers, and aligns with the expectations we maintain for our own directors, officers, employees and representatives. Our requirements and expectations in the Code reflect applicable laws, widely accepted international human rights principles, and our own internal policies and procedures.

Our suppliers are critical to our success. In order to provide superior products and services to our customers in a responsible manner, we require you to meet our expectations for ethics and compliance as set forth in this Code. Amsted Automotive understands and expects that our product and service suppliers will have their own

internal codes of ethics and conduct; this Code is not intended to be an exhaustive list of all ethical and business conduct requirements. You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contract(s) with Amsted Automotive. **If a contract requirement is more restrictive than the Code, you must comply with the more restrictive contract requirement.**

## Supplier Obligations

Every Company supplier must:

- Know and follow this Code.
- Report any non-compliance and transparently report remediation progress.
- Demonstrate appropriate internal controls upon request.
- Enforce a similar code and require that your suppliers do the same.
- Identify and use suppliers who adhere to the requirements of this Code and monitor those parties' compliance.

## Labor and Human Rights

**No Child Labor.** The use of child labor is forbidden under all circumstances, and you must ensure that child labor is not used in the performance of your work. The term “child” refers to any person under the minimum legal age for employment where the work is performed as set by local, state, or national authorities.

**No Human Trafficking, Forced, or Compulsory Labor.** You must comply with laws and regulations prohibiting human trafficking. You are forbidden from engaging in or benefiting from the use of forced or compulsory labor, including bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons. Workers shall be free to terminate their employment at any time and consistent with the terms of any applicable contract.

**Fair and Legal Employment Conditions.** Our suppliers must comply with all applicable regulations, laws, and bargained-for provisions pertaining to employee wages, work hours, overtime, and benefits. A supplier shall inform its workforce of the basis on which they are paid and pay them in a timely manner. Deductions from wages as a disciplinary measure shall not be permitted.

**No Discrimination or Harassment.** Suppliers shall not allow or tolerate discrimination or harassment based upon race, color, religion, age, gender, sexual orientation, gender identity, national origin, disability, veteran status, genetic information, pregnancy, or other factors that may be covered by local law.

**Respect Freedom of Association.** Suppliers shall comply with applicable laws that recognize and respect the rights of employees to form and join workers' organizations, to associate freely, and to bargain collectively.

**Reporting Misconduct.** We expect suppliers to provide employees and business partners with access to adequate reporting channels on an anonymous or self-identified basis to raise legal or ethical issues or concerns without retaliation, including, without limitation, reports of a violation of this Code. In the event that you become aware of misconduct by a Company employee or by any of your or your business partners' employees in connection with Company business, we expect you to promptly notify us. Individuals reporting an issue may contact us on an anonymous or self-identified basis through the Amsted Corporate Compliance Helpline at [amsted.ethicspoint.com](https://amsted.ethicspoint.com) or via the toll-free phone numbers listed on that site. You must promptly investigate reports of legal or ethical issues or concerns.

## **Risk Management and Mitigation**

**Supplier Code of Conduct:** Amsted Automotive requires all suppliers to agree to its Supplier Code of Conduct and this compliance is included in the Means Industries, Inc., Transform Automotive, LLC and Transform Automotive Canada Ltd contract terms and conditions.

**Code of Ethics:** Amsted Automotive also follows the Amsted Industries, Inc. Code of Ethics that states that our Company looks to uphold basic human rights in all of our operations. Amsted follows all applicable wage and hour laws, and does not use or condone the use of child labor, forced labor, or human trafficking. Neither Means Industries, Inc., Transform Automotive, LLC or Transform Automotive Canada Ltd. hires or contracts with any outside suppliers that hire or use child labor.

**Supplier Audits:** As Means Industries, Inc., Transform Automotive, LLC and Transform Automotive Canada Ltd gains a stronger understanding of its overall supplier ESG risks, each is defining an approach to auditing suppliers beyond their existing quality and process audits.

## **Remediation Measures**

To support effective prevention and remediation, Amsted Automotive provides several avenues through which to communicate or register a grievance. Employees that suspect any misconduct are encouraged to contact any or more of the following:

- Their supervisor or any member of management
- Human Resources
- The Helpline (phone or email)
- The Law Department
- General Counsel/Chief Compliance Officer
- Chief Financial Officer

All reports of misconduct are investigated promptly and thoroughly.

### **Training**

All employees of the reporting entities' are required annually to take a course in the Amsted Industries, Inc. code of ethics that highlights the restrictions of hiring child or forced labor or utilizing suppliers that hire or utilize forced labor or child labor.

### **Remediation of Loss of Income**

Neither Means Industries, Inc., Transform Automotive, LLC or Transform Automotive Canada Ltd have been made aware of any instances of force labor or child labor occurring in the reporting entities' supply chain in the reporting period.

### **Assessing Effectiveness**

To ensure that the reporting entities' supply chain standards are met, the combination of supplier audits, the supplier questionnaire and the supplier approval process will confirm compliance with child and forced labor laws and requirements. These measures will all be implemented by the end of the reporting period.