

## All-Fab Policy for the Prevention of Modern Slavery & Human Trafficking

### 1. General Statements

- a. The purpose of the policy is to provide guidelines to all employees of All-Fab Group (AFG) with respect to the prevention of any occurrence of Modern Slavery during the conduct of our business.
- b. This policy is an extension of the AFG Position Statement Against Modern Slavery & Human Trafficking issued on 30 May 2024. Our position statement has been approved by the AFG Board of Directors.
- c. This policy does not form part of any Employee's contract of employment, and it may be amended at any time. The Company may also vary any parts of this policy to ensure compliance with applicable legislation and/or best practices.
- d. All employees and internal contractors are required to comply with this policy. The scope of this policy will extend to our relationships with suppliers and customers.

### 2. Policy statement

- a. Modern Slavery is a crime in violation of fundamental human rights. It takes various forms, such as forced servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- b. We have a zero-tolerance approach to modern slavery, and we are committed to ensuring that Modern Slavery practices do not exist within our company. We are further committed to monitor our contractors, customers and suppliers to ensure that they are not engaged in any Modern Slavery practices. We will not conduct business with any organization that engages in Modern Slavery practices.
- c. AFG shall take appropriate measures to ensure transparency within our business or supply chain in preventing Modern Slavery practices, consistent with our disclosure obligations under the Government of Canada Modern Slavery Act 2024. We will expect our contractors, suppliers and customers to also adopt similar practices in their business conduct
- d. This policy applies to all persons working for us or on our behalf in any capacity, including all employees or any business associates such as directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, or other business partners.

All Fab Group, 200-1601 Regent Avenue West, Winnipeg, MB R2C 3B3  
TF. (800) 665-0335 T. (204) 661-8880 F. (204)661-6973  
[www.all-fab.com](http://www.all-fab.com)

### 3. Responsibility for the policy

- a. The President and CEO of AFG, reporting to our Board of Directors, has overall direct responsibility for ensuring that the policy and associated practices are compliant with legislation and is reflective of the cultural values of our company.
- b. The AFG Human Resources (HR) Senior leader has the direct functional responsibility for implementing this policy across all AFG operating groups (ie. Business Divisions and Functional Teams). The HR Senior leader shall coordinate all communications, training, reporting, monitoring and auditing of relevant company practices.
- c. The AFG Senior Leadership Team, consisting of Executives, Divisional General Managers, and Functional Senior Managers have the collective and individual responsibilities to implement this policy within the operating Divisions and across the functional business groups.
- d. AFG Managers and Supervisors at all levels are responsible for ensuring that the practices of our daily business are fully compliant with the policy in action and intent.
- e. The AFG Purchasing Senior leader has the direct functional responsibility for implementing this policy across the entire AFG supply chain. The Purchasing Senior leader shall coordinate the communications, reporting, monitoring and auditing of all Suppliers consistent with this policy. The AFG Purchasing Senior leader shall recommend the termination of any Supplier that is noncompliant with our policy.

### 4. Compliance with the policy

- a. All employees will be required to read and comply with this policy. The HR Team in collaboration with Managers and Supervisors, shall provide employees with relevant guidance and information to support full comprehension of this policy.
- b. The prevention, detection and reporting of Modern Slavery practices in any part of our business or supply chain is the responsibility of any and every person working for us or under our management. All employees or business associates are required to avoid any activity that might lead to or suggest a breach of this policy.
- c. All employees and business associates are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chain at the earliest possible stage. If a breach of this policy is suspected of

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having occurred, has been observed to have occurred or there is reason to believe that it may possibly occur, either a manager or a Direct Supervisor must be informed immediately. Any employee or business associate may also take the matter directly to the AFG HR Team at any point in time. If there is uncertainty of whether a particular act constitutes a compromise of this policy, individuals are encouraged to go directly to the AFG HR Team to discuss their concerns. All such communications shall be considered strictly confidential in nature.

- d. The AFG leadership encourages openness and candid dialogue on this important issue. We commit to supporting anyone who raises genuine concerns in good faith related to this policy, even if those concerns prove to be a misunderstanding. We are committed to ensuring no individual suffers any detrimental treatment due to good faith reporting of concerns related to potential occurrences of Modern Slavery practices. Detrimental treatment can include dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If any employee or business associate believes that they have suffered any such treatment, they should inform the AFG HR Team immediately.
5. Communication and awareness of this policy
    - a. Employees will be provided with education on the social issue of Modern Slavery and trained on our policy during initial orientation upon entry into the company. Continuous education on our policy and practices regarding this matter will be embedded within our normal business operations.
    - b. Our zero-tolerance approach to Modern Slavery will be clearly communicated to all employees, suppliers, and business associates at the commencement of our business relationship with them and reinforced as appropriate thereafter.
  6. Breaches of this policy
    - a. Any AFG employee who breaches this policy may face disciplinary action, which could result in dismissal with cause.
    - b. AFG may terminate the relationship with any business associate working on our behalf if they are in breach this policy.
  7. Review and Approval of this policy
    - a. This policy will be reviewed and approved at least annually by the President and CEO of AFG in consultation with the Board of Directors and members of the AFG Senior Management Team.