



Court Holdings Limited

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report for Court Holdings Limited

BACKGROUND

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), Court Holdings Limited (“CHL”) has prepared the following report (this “Report”) disclosing the steps taken by CHL and its applicable subsidiaries over its 2023 financial fiscal year to prevent or reduce the risks of forced labour or child labour in its activities and supply chains. CHL and its applicable subsidiaries are only subject to the reporting requirements in Canada and are not subject to reporting requirements of any other jurisdiction. This is a joint report under the Act for the following reporting entities (the “Reporting Entities”):

- Court Holdings Limited;
- Court Holdings Manufacturing Limited; and
- Niagara Piston Inc.

The information in this report generally applies to all Reporting Entities and is primarily reporting on the activities of Niagara Piston Inc., being the only Reporting Entity directly engaged in the production, sale, distribution and importation of goods. In this Report, “we”, “us” and “our” means the Reporting Entities collectively.

This report was approved by CHL’s Board of Directors on May 27 2024.

STRUCTURE, ACTIVITIES, SUPPLY CHAIN

CHL is a Canadian Controlled Private Corporation, headquartered in Beamsville, Ontario, Canada. CHL directly controls Court Holdings Manufacturing Limited, which directly controls Niagara Piston Inc.





Court Holdings Limited

Notwithstanding direct control by its parent corporations, Niagara Piston Inc. operates autonomously with respect to all aspects of its business relating to manufacturing and labour practices.

We operate in the manufacturing industry, with our activities relating to producing, selling, and importing steel and phenolic goods. We are a Tier Two automotive supplier and producer of steel and OEM disc brake caliper pistons. Goods are produced and manufactured in Canada and sold both within and outside of Canada, with greater than 95% of our sales exported outside of Canada. Raw material used in the production and manufacturing of goods are sourced from suppliers, greater than 98% being sourced from suppliers located in Ontario, Canada, with 2% sourced from suppliers located in the United States of America.

From a geographic standpoint, we consider there to be a limited risk of forced labour and child labour in our businesses. The majority of our production and supply of raw materials is located in Canada, which is [widely known to have a low risk of forced and child labour.](#)

STEPS TAKEN TO PREVENT/REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

In the previous financial year, we have taken steps to reduce the risk of forced labour or child labour being used at any step in the production and importation of goods.

As a producer of steel and phenolic disc brake pistons, we work with suppliers of raw material located both in Ontario and in the United States of America. One of the steps we have taken to reduce the risk of forced labour or child labour is to require suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains. Our suppliers are required to meet the forced labour and child labour standards of the *Canada Labour Code* and the *Employment Standards Act* (Ontario) to be eligible to quote and supply the Corporation.

In addition, we are engaged with our supply chain partners to address forced labour and/or child labour by, as part of the request for quotation process, providing a memo, "Material Sourcing Labour Practice", on forced labour and child labour. The memo requires all suppliers to source products in an ethical manner, otherwise their option to quote and supply our required products is forfeited. The memo must be signed by the supplier before we accept their business.

We have also taken steps such as conducting an internal assessment of risks in the organizations' activities and supply chains, developing and implementing an action plan to address forced labour and/or child labour, addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour and gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.

SUPPLEMENTARY INFORMATION ON THE STEPS TAKEN

Policies and Due Diligence to Prevent and Reduce the Risk

We do not currently have policies and due diligence processes in place related to forced labour and/or child labour.



Court Holdings Limited

[Risks of Forced Labour and Child Labour in Activities and Supply Chains](#)

Our activities relate to the manufacturing and mining, quarrying, and oil and gas extraction industries. We understand and acknowledge that there are inherent risks of forced labour within these industries and their supply chains due to the mining of raw materials and the process of steelmaking. To address these inherent risks, we have started the process of identifying the risks associated with its activities and supply chains. The risks that have been identified relate to the raw materials or commodities used in the supply chains, however, there are still gaps in our assessment.

In an attempt to address and eliminate identified risks, we require that our supply base understand and agree to source in an ethical manner in accordance with the *Canada Labour Code* and the *Employment Standards Act* (Ontario). In addition, as part of our terms and conditions in the contracts entered into with suppliers, we require our suppliers to agree to follow applicable legislative labour policies and the standards of [Responsible Steel](#), a non-profit organization that creates standards and certifications to create a social responsible supply chain in the steel industry.

[Measures to Remediate Forced Labour or Child Labour](#)

We have not identified any instances of forced labour or child labour in our activities and supply chains. As such, we have not taken or implemented remediation measures.

[Measures to Remediate the Loss of Income](#)

We have not identified any loss of income to vulnerable families resulting from measures taken to address and eliminate the use of forced labour or child labour in our activities and supply chains. As such, we have not undertaken remediation actions related to loss of income to vulnerable families.

[Training Provided to Employees](#)

We do not currently provide our employees training on forced labour or child labour. We plan on implementing training protocols in 2024.

[Assessing Effectiveness](#)

We do not currently have policies, processes or other actions in place to assess our effectiveness in ensuring that forced labour and child labour is not being used in our activities and supply chains.

[GOVERNING BODY APPROVAL](#)

This is a joint report for Court Holdings Limited and its applicable subsidiaries that are Reporting Entities and has been approved by CHL's Board of Directors pursuant to Section 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true,



Court Holdings Limited

accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Date: May 27, 2024

Name: Philip Court
Title: President

I/we have authority to bind Court Holdings Limited