



## ***Fighting Against Forced Labour and Child Labour in Supply Chains Act***

### **Disclosure Report**

#### **I. Disclosing Entity**

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This disclosure report is submitted by **Stowe Woodward LLC** (hereinafter referred to as “Stowe”).

#### **II. About this Disclosure Report**

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This disclosure report is submitted in accordance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Bill S-211) and guidance issued by Public Safety Canada.

#### **III. Introduction**

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STOWE and its affiliated companies are committed to integrity, respect, and fair dealing in their business activities. This commitment includes the fair and equitable treatment of employees, business partners (and their employees), members of the community, and all other stakeholders with whom we engage. STOWE does not tolerate forced labour, child labour, or any other human rights abuses in any of its business activities.

#### **IV. Business Structure, Activities, and Supply Chains**

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STOWE is a manufacturer and supplier of roll covers for pulp and paper making machines. In addition, as part of its service business, STOWE refurbishes, replaces, and redesigns industrial rolls and supplies spare parts to its customers. As part of its business activities, STOWE sells goods inside and outside of Canada.

STOWE is incorporated in Delaware and headquartered in Raleigh, North Carolina. It also has offices and facilities in other locations, including Griffin, Georgia; Ruston, Louisiana; Concord, New Hampshire; and Neenah, Wisconsin. STOWE has approximately 240 employees.

STOWE maintains a global supply chain that includes:

- Suppliers of direct materials, manufacturing materials, and packaging materials such as machine shop and metal fabrication materials, lumber and plywood, bearings, stock metal (bar and sheet metal), and roll cover-related chemicals. These materials are procured from affiliated STOWE entities as well as non-affiliated third-party vendors and suppliers located all across the world including United States, Canada, and Germany.
- Suppliers of indirect goods and services including professional services, facilities, office supplies, and sales and marketing services.
- Customers located in Canada and the United States.

#### **V. Policies Related to Forced Labour and Child Labour**

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STOWE’s *Code of Conduct and Ethics* requires all personnel to adhere to the highest levels of ethics and integrity in all of their business activities. This includes compliance with applicable laws and legal standards, and the responsibility to maintain a safe, healthy, and respectful work environment. A



fundamental principle of the *Code of Conduct and Ethics* is that personnel treat each other with respect, dignity, and fairness – and to protect human rights in their daily business activities. To that end, the *Code of Conduct and Ethics* expressly prohibits anyone from engaging in, or benefiting from, any form of forced labour, involuntary labour, and/or child labour. Employees receive a copy of the *Code of Conduct and Ethics* when onboarded to the company and are expected to comply with the standards of conduct articulated therein. Moreover, employees receive periodic training and communications explaining their responsibility to act ethically and in compliance with the law.

STOWE's commitment to protecting human rights is further demonstrated in the company's *Supplier Code of Conduct and Ethics Policy* and *Supplier Code of Conduct and Ethics*, which were updated in February 2024. The revised *Supplier Code of Conduct and Ethics*, which addresses a range of topics including human rights and fair working conditions, sets forth the minimum requirements for any third-party vendor or supplier engaged to transact business with STOWE. The Code specifically requires STOWE vendors or suppliers to refrain from engaging in, or benefiting from, any form of child labour, forced or involuntary labour, modern slavery, or similar labor practices. These vendors and suppliers are also required to acknowledge and adhere to the principles articulated in the *Supplier Code of Conduct and Ethics*. This includes the commitment that these vendors or suppliers request the same, or similar, compliance standards from their business partners. STOWE has developed a *Supplier Code of Conduct and Ethics* training module which is available to third-party vendors and suppliers on a voluntary basis.

To build a more transparent, safe, and ethical workplace, STOWE has also implemented a highly secure whistleblowing system known as Speak Up!. This online reporting tool allows employees and third-party business partners to report instances of actual or suspected misconduct to Group Compliance in a safe and confidential manner. The Speak Up! reporting tool can be accessed online and by QR code

## **VI. Due Diligence Process Related to Forced Labour and Child Labour**

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Vendors and suppliers are screened through a prequalification and onboarding process. In some instances, there will also be an on-site audit of the vendor or supplier. The results of the vendor and supplier evaluation will determine whether the potential business partner may be engaged and/or whether any additional controls are needed to mitigate any risk.

## **VII. Risk of Forced Labour and Child Labour**

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STOWE evaluates supplier compliance risk, which considers the risk of forced labour and child labour, as part of its annual Risk Management review. In addition, STOWE uses the information collected from its supplier prequalification and onboarding processes to identify risks of forced labour and child labour in its supply chain. STOWE also considers the regions where its third-party vendors and suppliers are located, the materials and products they source, and their relationship history to assess relevant risk. In some cases, STOWE will conduct on-site audits of vendor or supplier facilities.

## **VIII. Remediation**

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STOWE has not identified any instances of forced labour or child labour in its business activities or supply chains. Accordingly, STOWE has not had cause to implement any forced labour or child labour related remediation measures.



## IX. Training

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STOWE provides training on the *Code of Conduct and Ethics*. This training module addresses human rights issues and the importance of treating employees and third-party business partners fairly and with integrity and respect. STOWE tracks completion of this training on a regular basis.

STOWE has also developed a training module on the *Supplier Code of Conduct and Ethics*, which is available to employees and third-party vendors and suppliers on a voluntary basis.

## X. Assessing Effectiveness

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STOWE has developed and tracks metrics designed to assess its effectiveness in mitigating the risk of forced labour and child labour in its supply chain. This includes tracking employee training completion on a monthly basis. In addition, STOWE tracks the number of reports related to supplier-related misconduct (including the use of forced and child labour) through Speak Up! and other internal reporting tools.

## XI. Approval

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This report has been approved by the Board of Directors of **Stowe Woodward LLC** in accordance with section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("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 listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Dated: 19 May 2025

Signature: \_\_\_\_\_

Full Name: Phillip B. Kennedy

Title: Secretary