



2025 Report

Fighting Against Forced Labour and
Child Labour in Supply Chains Act

Introduction

This Report is published pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“**Modern Slavery Act**”) by Avera Technologies Inc. on behalf of itself and its wholly owned subsidiaries (collectively, “**Avera**”) for the Fiscal Year 2025, which started on April 1, 2024, and ended on March 31, 2025. Certain initiatives from the month of May 2025 were also included to provide a more detailed insight into our efforts with respect to the prevention and reduction of risks related to forced labour and child labour in our operations.

As a worldwide Test & Quality leader, our clients rely on us to be dependable — and we take immense pride in being the trusted partner they turn to when faced with complex challenges. Our approach to supply chain management and human rights, as outlined in this Report, reflects a sincere understanding of our role as a global organization in ensuring that the reliability and accountability we lead with comes from within.

Our goal is to ensure that as we continue to grow, we do so in a manner that is not only responsible but also forward-thinking. The human rights framework described in this Report and developed in accordance with the Modern Slavery Act guides and will continue to guide us as we navigate the complexities of sustainable business practices in diverse jurisdictions.

About Avera

a. Activities

Founded in 1999, Avera is a global leader in Test & Quality Solutions, who partners with product designers, developers, and manufacturers across diverse industries to enhance product quality, expedite time to market, and safeguard brand integrity. With a workforce spanning over 1,200 professionals across 11 offices, Avera provides specialized expertise and innovative test systems tailored to support the entire product lifecycle. Everyday, we empower industries such as automotive, medical devices, consumer electronics, and aerospace, through our comprehensive range of hardware and software solutions. More information can be found at <http://www.avera.com>.

b. Structure and Supply Chains

Avera Technologies Inc. is a privately owned corporation headquartered in Montreal, Quebec, and the parent company of a group of subsidiaries operating in North America, Europe and Asia. During Fiscal Year 2025, Avera completed two acquisitions, resulting in 12 new offices located across Czech Republic, India, Vietnam, China and Japan, and nearly 800 new colleagues. All subsidiaries report to the headquarters.

Our offices all benefit from their own supply chains to better respond to the varying needs of our customers. With the support of local procurement managers and colleagues, Avera’s procurement activities are being centralized at its headquarters to ensure that recently acquired supply chains benefit from the same level of oversight and are governed by the same principles.

Our global Logistics & Procurement team is responsible for ensuring such monitoring with the help of our Legal department; it entails supporting the procurement of parts and materials for the entire Avera group, identifying suppliers and assessing their suitability, as well as seeing that supply contracts are concluded in accordance with our supplier onboarding process.

Purchasing decisions and related operations remain subject to executive oversight, whether by regional Vice Presidents or by executive team members at the headquarters.

Supply Chain Monitoring

a. Due Diligence Processes in Relation to Forced Labour and Child Labour

Throughout its supply chain due diligence process and assessment, Avera remained dedicated to addressing findings with a focus on human rights and sustainability, while ensuring that financial considerations did not compromise the company's moral compass. It also sought to increase the reliability of its information by deploying a greater number of colleagues on the assessment exercises, as well as mobilizing a wider range of departments than it did in the previous fiscal year.

Our global procurement sustainability strategy, developed at our headquarters, focuses on aligning all management teams and executives around a shared commitment to monitoring and addressing human rights risks, including forced labour and child labour, before they materialize. Our action plan further emphasizes the importance of the internal controls put in place to keep track of legal, commercial, and international trends to ensure supply chain-related challenges are faced proactively, consistently and ethically.

The efforts deployed by Avera with respect to risks of forced labour and child labour across its operations and supply chains include mapping activities and suppliers, conducting internal risk assessments based on geography, industry, and supplier type, and developing targeted action plans. We require all suppliers to comply with our updated Supplier Code of Conduct, integrate anti-forced labour and child labour clauses in our Supplier Terms and Conditions, and we monitor their adherence through ongoing assessments and re-onboarding where necessary. Our recruitment and procurement practices were reviewed globally to ensure workers are recruited voluntarily, and relevant procurement and recruitment teams received training on these issues. Grievance mechanisms are in place to address concerns, and we prioritize high-risk areas to ensure resources are focused where risks are most severe.

In fiscal year 2025, the company's due diligence efforts focused on the integration of new entities and suppliers, as well as the continuation of monitoring and updating our processes to reflect new or emerging risks. Our efforts remained guided by international standards and were continuously reinforced through cross-functional collaboration and management oversight.

In addition to mapping and assessing the procurement activities of newly acquired entities to ensure they adhered to our updated policies, our existing suppliers were also required to reaffirm their

commitment to our expectations. Any supplier, new or existing, who did not follow the established onboarding process was contacted to be re-onboarded to ensure compliance. This was particularly important for suppliers who failed to provide sufficient information regarding their supply chains.

b. Risk Assessment and Management

This risk assessment of our suppliers relies on a prioritization exercise based on factors such as the geographic location of suppliers, the industry sector in which they operate, and the nature of the goods and services they provide. These due diligence processes are structured in line with internationally recognized standards, including the guidelines established by the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, and the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas. While assessments have been more comprehensive in regions with higher-risk profiles, all suppliers, including those in low-risk areas, are subject to a consistent and rigorous process of assessment and monitoring.

Targeted risk assessments were carried out in regions such as India, with a particular focus on recruitment practices, as local operations are primarily centered around software services and the provision of on-site support. While supply chain activity in India is relatively limited, resulting in a less comprehensive assessment compared to other regions, the evaluation nonetheless involved close collaboration with both the local HR manager and the global HR director, supported by documented follow-ups to ensure effective risk management.

The company's commitment to continuously improving risk management is reinforced by the active involvement of relevant departments and executives. In particular, the structural changes to the company's management team – with the appointment of Vice Presidents to oversee our key regions (Americas, Europe, and Asia) – ensures that regional operations are closely monitored and that no risks related to forced or child labor are overlooked. Such changes are actively leveraged to promote accountability and ensure that stakeholder concerns or operational vulnerabilities are not overlooked.

Policies & Stakeholder Engagement

a. Supplier Code of Conduct

During Fiscal Year 2025, we committed to reviewing our policy framework to ensure that accountability and integrity were upheld at every operational level, both across our internal processes and during commercial activities.

Averna completed the deployment of its first Supplier Code of Conduct at the beginning of the fiscal year. This document outlined our expectations for all third parties, other than customers, with respect to sustainability and corporate responsibility, and explicitly prohibits our suppliers from using, engaging in, or benefiting from forced labour and child labour. Considering the changes brought by its subsequent acquisitions, Averna modified its Supplier Code of Conduct at the end of its fiscal year, to ensure that it continued to meet the needs raised during our supply chain due diligence and monitoring of related risks. This revision entailed:

- Adding greater protections for vulnerable workers, as well as reinforcing requirements related to labour conditions and equality in the workplace, including with respect to freedom of association rights and collective bargaining;
- and reinforcing our ethical recruitment standards for foreign migrant workers;
- Enforcing higher expectations for sourcing consciousness and introducing a supply chain-wide expectation of working towards achieving a conflict-free status;
- Broadening the scope of the whistleblowing and grievance mechanisms expect of suppliers, while making explicit the fact that Avera's Whistleblowing & Grievance Mechanisms were available to all stakeholders, including them; and
- Revamping other provisions in line with our Environmental, Social, Governance (ESG) objectives.

Avera continues to mobilize its executive team and relevant department leaders to ensure that the requirements of its Supplier Code of Conduct are effectively escalated throughout all levels of its supply chain and across all its subsidiaries. Our Supplier Terms and Conditions are under review by the relevant teams as well to strengthen and update onboarding compliance requirements.

b. Code of Ethics & Business Conduct and Whistleblowing & Grievances Policy

Our Code of Ethics & Business Conduct embodies the four pillars that Avera's core values rest upon: teamwork and commitment, innovation and knowledge, performance and leadership and customer satisfaction. It is also an invitation for our employees to recognize the important role that each one of us plays in valuing the accountability and integrity to which we owe our success. It has been made available in all languages of the countries in which we have offices, including for recently acquired entities. Our employees will continue to sign it every two years. Our annexed Whistleblowing & Grievance Policy have also been reinforced to increase transparency with respect to processing times.

c. Sustainability & Corporate Responsibility Report

The publication of our first Sustainability & Corporate Responsibility (ESG) Report also furthered the application of our ethical commitments, in addition to allowing awareness about sustainability issues to be continuously raised among employees. Supply chain due diligence and monitoring was covered in our ESG Report, with our initiatives supported by both qualitative and quantitative performance metrics. Such metrics were developed in accordance with internationally recognized reporting guidelines (namely, the Sustainability Accounting Board Standards).

d. Training Provided and Ongoing

As a global and expanding company, we also value and appreciate the role played by stakeholder engagement in holding us accountable; as such, we remain committed to leveraging opportunities of familiarizing ourselves with and meeting the needs of our suppliers, employees, customers, and other collaborators. Given the growth of our operations, workforce, and supply chain during Fiscal Year 2025, Avera sought to ensure that its efforts deployed in the context of this Report were effectively escalated across all its subsidiaries. Supply chain considerations with respect to the prevention and reduction of risks related to forced child labour have been and continue to be a core aspect of its ongoing integration of recently acquired entities.

As explained above, our recruitment and procurement practices were reviewed at a global scale. HR and purchasing teams resulting from acquisitions further received training on forced and child labor risks and Avera's commitments with respect to the latter to ensure company-wide alignment. Our new suppliers, including recruitment agencies, were all subject to a due diligence and will continue to be assessed against Avera's expectations of respect for human rights and integrity, while the training of HR and L&P colleagues will remain ongoing. In fiscal year 2025, the scope of completed trainings was broadened to also include other human rights considerations, such as conflicts minerals, the impact of responsible sourcing on sustainability and business continuity, as well as the importance of maintaining a transparent reporting framework accessible to all stakeholders.

Remediation Measures

No instances of forced labour or child labour have been detected through Avera's thorough due diligence and risks assessments with respect to its supply chain and operations. Our internal audit, which covered whistleblowing and grievances, if any, as well as recruitment practices, also did not reveal any violations to the human rights of our personnel or business partners.

Should risks materialize or concerns be raised, Avera is prepared and committed to promptly implement the necessary remediation measures.

Effectiveness Assessment

Avera has taken the following steps to assess the effectiveness of the measures it has implemented in connection with eliminating or mitigating risks of forced labour or child labour in its activities and supply chain: (i) setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour; (ii) tracking relevant performance indicators, including levels of employee awareness, numbers of cases reported and solved through grievance mechanisms, and numbers of contracts with anti-forced labour and anti-child labour clauses; and (iii) working with suppliers to measure the effectiveness of its actions in connection with this Report.

These internal due diligence activities are further complemented by Avera's participation in the 2024 Carbon Disclosure Project and our successful completion of numerous external sustainability and corporate responsibility assessments through platforms such as IntegrityNext and SUPPLIERASSURANCE, among others.

Attestation

In accordance with the requirements of the Modern Slavery 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, accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.

I have the authority to bind Avera Technologies Inc. and its wholly owned subsidiaries.

A handwritten signature in black ink, reading "Rania Hamdine". The signature is written in a cursive style with a large, stylized "R" and "H".

Rania Hamdine

Legal & Compliance Counsel, ESG Officer

May 30, 2025