

**DENSO Manufacturing Canada, Inc.  
2025 S-211 Report**

**Company Structure, Activities and Supply Chains**

DENSO Manufacturing Canada, Inc. (Company) is a Canadian corporation located in Guelph, Ontario. The Company employs more than 600 associates and produces leading thermal solutions like heating, ventilation and air conditioning systems and engine cooling modules for major carmakers. DENSO Corporation (DENSO), a publicly traded Japanese company, develops advanced technology and components for passenger and heavy-duty vehicles.

The Company's North America Purchasing Group (NAPG) continuously evaluates current processes, procedures and activities to prevent production disruptions and enhance the value of the supply chain. It is responsible for helping to ensure that Company suppliers adhere to all laws and regulatory requirements. NAPG uses various methods of communication, tools, and third-party experts to monitor compliance. For example, NAPG conducts due diligence and surveys to check suppliers against expected sustainability performance. Any supplier non-compliance or poor evaluation is recorded and then shared within NAPG to identify supplier development steps, change order policy, or initiate corrective action.

**Company Policies, Guidelines, and Terms and Conditions**

The Company adheres to the DENSO Group Human Rights Policy, the DENSO CSR (Corporate Social Responsibility) Supplier Guidelines, and the DENSO Global Sustainability Guidelines. DENSO issues all the important documents and supplier guidelines, making them available on the Company website.

The DENSO Group Human Rights Policy outlines our strong commitment to promoting respect for human rights and our expectations that our suppliers and all business partners support and comply with this Policy.

The DENSO CSR Supplier Guidelines clearly communicate our expectation for corporate behavior, including our firm expectation that neither the Company nor its suppliers shall use forced labour. To ensure DENSO is working with suppliers that are actively addressing forced labour risk, we have scoped in priority suppliers based on criticality of business and spend. It is the belief and commitment of the Company to ensure that all work is voluntary and that employees are free to terminate their employment.

The DENSO Supplier Sustainability Guidelines articulates how we will do business as a responsible corporate citizen:

- Based on international standards including the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, we will respect the human rights of all persons involved in our business activities. We will ensure that our business activities do not violate human rights in any form. For example, we will not use labour that violates human rights, such as forced labour or child labour in any form. We will understand issues that could cause human rights infringements, such as issues of conflict minerals, and ensure that our business activities will not be complicit in human rights violations.

- We will comply with laws of each country and region pertaining to basic labour conditions such as working hours, days off, wages, and will maintain and improve a safe and healthy working environment.
- We will provide fair work conditions and employment opportunities, free from discrimination based on gender, age, nationality, disability status, sexual orientation, or other factors in any employment situation. We will provide training and development opportunities for our employees and encourage success within a diverse workforce.
- We will build and share a sense of mutual trust and responsibility with employees through sincere communication and discussion.

In addition to our Human Rights Policy and the Guidelines described above, our Terms and Conditions contractually obligate our suppliers to comply with all laws and regulations.

### **Company Due Diligence and Risk Mitigation**

DENSO maintains a completed Slavery and Trafficking Risk Template (STRT) to be available when OEM customers request this document. The STRT is a free, open-source template used to support organizations in their anti-slavery, human trafficking and child labour compliance programs. The purpose of the STRT is to serve as the single standard survey for the collection and sharing of slavery, human trafficking and child labour risk and compliance-related data across supply chains. The STRT has and continues to enable DENSO to evaluate the supply chain and identify potential risk areas. In 2024, DENSO conducted its planned bi-annual corporate sustainability survey, utilizing a targeted spend threshold and level of defined critical parts and materials. In response to survey submissions that did not meet DENSO standards, the company required countermeasure actions from suppliers. As a result of this process, all suppliers have completed and implemented the necessary countermeasures within 2025. Using the Survey and the STRT, DENSO did not identify any violations of the DENSO Group Human Rights Policy, the DENSO CSR Supplier Guidelines, the DENSO Global Sustainability Guidelines, or the Company Terms and Conditions.

DENSO is expanding its work to identify risk within the North America supply chain in 2026 by launching the Forced Labor Solution within the Assent Supply Chain Sustainability Platform. This new activity will enhance DENSO's ability to comply with global regulations and emerging requirements such as the Uyghur Forced Labor Prevention Act (UFLPA), Canada's Fighting Against Forced Labour & Child Labour in Supply Chains Act (Bill S-211), the Australian Modern Slavery Act(MSA), and the UK MSA.

Furthermore, DENSO conducts an annual, detailed analysis of the countries of origin for select materials and related smelters, refiners, and processors, collaborating with an expert third party. In 2025, DENSO transitioned from KPIT to Assent. Assent is a global company with greater resources and supports automotive global tier 1 suppliers as well as the OEM's for Conflict Materials reporting. The transition to Assent has provided DENSO with online, cloud-based supplier status, which allows DENSO to gather data in real time. DENSO will continue to utilize standard reporting, which uses a template issued by the Responsible Minerals Initiative (RMI). Investigation and reporting for both standard Conflict Minerals and Extended Mineral compliance is completed annually. No suppliers at risk were identified within the latest reporting period in February 2026.

DENSO is continuously adjusting to all specific or focused regulatory requirements issued by the countries in which the Company operates and conducts business within. Updates and enhancements to

DENSO's supplier requirements, documentation, terms & conditions, and operational expectations are communicated directly to suppliers. Suppliers are required to directly respond and acknowledge these changes.

### Training and Employee Expectations

In accordance with Canadian laws and regulations, the Company explicitly prohibits labour practices that infringe upon hours of work, safety, pay discrimination, and other areas of discrimination and human rights of employees. The Company uses regular trainings to ensure full compliance with these regulations, including new hire orientation and annual mandatory training sessions. All employees of the Company are expected to comply with this commitment and to all related corporate policies, including the DENSO Group Human Rights Policy, the DENSO CSR Supplier Guidelines, and the DENSO Global Sustainability Guidelines.

### Attestation

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 DENSO Manufacturing Canada, Inc. 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.

DENSO Manufacturing Canada, Inc.

By: \_\_\_\_\_

  
John Klassen, President