



Gates Industrial Corporation plc Modern Slavery Act Statement

Gates Industrial Corporation plc (“Gates”) prepared this statement, which has been adopted by Gates subsidiaries Atlas Hydraulics Inc. and Gates Canada Inc. in accordance with the Canadian Forced and Child Labour in Supply Chains Act. This statement describes the actions taken by Gates and its subsidiaries to prevent slavery and human trafficking in its manufacturing operations and supply chains.

Organizational Structure, Business, and Supply Chains

Gates is a global manufacturer of innovative, highly engineered power transmission and fluid power solutions. The Company offers a broad portfolio of products to diverse replacement channel customers and to original equipment (“first-fit”) manufacturers. Gates products are used in applications across numerous end markets, including industrial off-highway end markets such as construction and agriculture, industrial on-highway end markets such as transportation, diversified industrial, energy and resources, automotive, and mobility and recreation. Gates employs approximately 15,000 employees worldwide and operates across 120 locations in 30 countries.

Gates works with suppliers worldwide to source quality raw materials, goods, and services that are used to run its business and to produce world class products. Gates also partners with customers and distributors to deliver its products to market.

Policies, Commitment and Reporting

Gates recognizes that all forms of slavery, forced labor and human trafficking (collectively, “modern slavery”) are a global concern given the rapid rise in international migration and inequity in many economies, whether industrialized, developing or in-conflict. Gates has a zero tolerance policy for any form of modern slavery within its operations and supply chains. Gates recognizes its responsibility to identify and prevent risks in its operations and supply chains, and to act upon any concerns or legitimate grievances. Any issues or concerns regarding modern slavery at Gates or in its supply chains can be confidentially and anonymously reported by employees or third parties by using one of the following methods:

- (a) in writing to Gates Industrial Corporation plc, Attn: Audit Committee/Chief Legal Officer, 1144 Fifteenth St., Suite 1400, Denver, Colorado 80202;
- (b) by sending an e-mail to compliance@gates.com;
- (c) by calling (toll free) the number appropriate to the applicable language or location listed on Annex A to Gates’ Code of Business Conduct and Ethics (available on gates.com) or as found on gatescorp.ethicspoint.com; or
- (d) by accessing the web portal of Gates’ third-party provider at gatescorp.ethicspoint.com or the web portal of any successor third party provider as may be approved from time to time by Gates.

In addition, Gates' *Code of Business Conduct and Ethics* ("Code"), *Human Rights Policy*, and *Supplier Code of Conduct* ("Supplier Code"), all found on its corporate website at www.gates.com, describe Gates' commitment to ensuring that its products are manufactured under conditions that demonstrate respect for the people who make them and the communities in which they are made, and its requirements that its suppliers and distributors engage in and maintain lawful, efficient and fair labor practices. Gates requires that the conditions in its supply chain are safe and that workers are treated with respect and dignity. These policies are enforced worldwide and are reviewed and updated regularly. All employees are required to comply with our Code, while suppliers are strongly encouraged to acknowledge and support the Supplier Code.

Due Diligence, Business Structure and Supplier Relationships

As part of Gates' initiative to identify and mitigate the risk of modern slavery, Gates has implemented and enforces effective systems and controls to prevent modern slavery from taking place in its supply chains. As it relates to their activities, Gates' suppliers are obligated to operate in full compliance with the laws, rules and regulations of the countries in which they operate.

Those obligations are enforced through Gates' due diligence and compliance processes, appropriate contractual provisions, and its Supplier Code. Gates' suppliers and distributors must complete a rigorous pre-screening and due diligence process, which includes screening such entities against numerous global anti-corruption and sanctions lists. This screening, and any additional due diligence Gates deems necessary, is conducted in coordination with third party providers to Gates.

Gates' suppliers are also aware that Gates may, with or without notice, conduct audits of their operations, their subcontractors and their next tier suppliers, to evaluate compliance with Gates' Code and Supplier Code and applicable laws and regulations.

Training

To ensure a high level of understanding of the risks of modern slavery in its supply chains, Gates provides training to key staff in its operations, procurement and commercial teams, to upskill staff on the implementation of relevant compliance policies, procedures and processes.

Effectiveness and Performance

Gates maintains a zero tolerance policy to modern slavery. As noted above, Gates monitors its suppliers' compliance with the Supplier Code, and operates anonymous reporting mechanisms. Gates also monitors the effectiveness of its measures to identify and prevent modern slavery.

This statement has been approved by the Boards of Directors of Atlas Hydraulics Inc. and Gates Canada Inc. and constitutes the Gates and its subsidiaries' modern slavery statement for the reporting period January 1, 2023 to December 31, 2023.

[Signature page to follow]



On behalf of Atlas Hydraulics Inc. Gates Canada Inc.

As of May 7, 2024



On behalf of Gates Canada Inc.

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