



Fighting Against Forced Labour and Child Labour in Supply Chains Act

2024-2025 ANNUAL REPORT

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Introduction

This statement is made pursuant to Bill S-211, an Act to enact the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and to amend the Customs Tariff. This statement outlines the approach and initiatives by **Starlim North America Corporation, Poly-Nova Technologies Corporation, Star-Nova Inc., 1510349 Ontario Limited, BETA Beratungs- und Beteiligungs-GmbH and FSS Vermögensverwaltung GmbH** (hereinafter together also referred to as "STARLIM", "Corporation", "our" or "we") to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing April 1, 2024 and ending March 31, 2025 (the "Reporting Period").

This report constitutes the second report prepared by STARLIM pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

The statement is a joint statement of the companies defined above and sets out our global practices, policies, and business processes to identify and address risks related to modern slavery in our operations and product supply chain. This statement has been adopted by our companies and has been prepared in consultation with these reporting entities. It sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used in our business operations, our supply chains and at any step of goods imported into Canada by STARLIM. The report will be published annually to chronicle our ongoing journey to protect human rights.

Steps Taken

At STARLIM we are committed to having a strong, resilient supply chain that upholds international human rights and labour standards, as laid out in our corporate Code of Conduct. We recognize our opportunity and responsibility to actively safeguard the working conditions of the people who make our products and to contribute to the eradication of modern slavery, including forced labour, child labour, and human trafficking, in our supply chain. As our business grows, we will continue to leverage collective action to elevate our practices and drive improvements.

During the Reporting Period, our efforts to prevent and reduce the risk of forced labour or child labour in our business and supply chains focused on:

- Updated Supplier Quality Manual (Rev 3 2024.Dec.15) to include Bill S-211 in section 4 Business Code of Conduct and Social Responsibility.
- Bill S-211 survey template sent to all current suppliers. All responses returned except one supplier who is soon to be 'obsolete'. No risks identified within supply chain.
- Now included as a requirement for any new supplier. Responses tracked and monitored on F.P.Q.M.087 Supplier Quality Workbook. Set on 3-year survey cycle.
- Reviewed our child protection policies and processes.
- Reviewed our anti-forced labour and/or -child labour standards, and codes of conduct.
- Monitoring and auditing suppliers.

Details of the above actions are set out in this Report.

Group Structure

The manufacturing companies of STARLIM, Starlim North America Corporation and Poly-Nova Technologies Corporation, produce silicone and rubber products by injection molding for the Automotive-, Mobility-, Life Science- and Industry sector.

Headquartered in Marchtrenk, Austria, BETA Beratungs- und Beteiligungs-GmbH ("BETA"), incorporated under the Austrian Limited Liability Company Act, is the Group's ultimate holding company. BETA is the holding company of FSS Vermoögensverwaltung GmbH ("FSS"), which is also incorporated under the Austrian Limited Liability Company Act. As the holding company of the subsidiaries, FSS is responsible for the strategy of the STARLIM group companies and controls 151 0349 Ontario Limited, Star-Nova Inc., Starlim North America Corporation and Poly-Nova Technologies Corporation, which are incorporated under the *Canada Business Corporation Act*.

The STARLIM group as defined above, plus the additional group companies not subject to the Act and this report, is a global business, with approximately 1,800 employees in 6 countries as of March 31, 2025. In Canada, STARLIM had 270 employees. Guided by core values of Growth, Development, and Humanity, STARLIM strives to create a diverse and inclusive culture everywhere it operates.

The structure of the company as it pertains to Bill S-211 can be found here:

ORGANIZATION STRUCTURE: STARLIM GROUP OF COMPANIES*



*Simplified structure for the purposes of Bill S-211 reporting

STARLIM's products are manufactured in Canada (Guelph and London). Operations conducted in those facilities include various manufacturing processes and activities. Sales of the Corporation's products are done through various offices of the Corporation.

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Activities and Supply Chains

STARLIM's activities include:

- Producing goods
 - In Canada
- Selling goods
 - In Canada
 - Outside Canada
- Distributing goods
 - In Canada
 - Outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing, selling, or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

BETA, FSS, 1510349 Ontario Limited and Star-Nova Inc. have assets in Canada and are controlling entities. BETA is the owner of patents and licences, thus generating its main income by licenses. FSS is the owner of all buildings and assets like liquid injection molding machines and its main income is generated by rental agreements, interests, and dividends.

STARLIM's global supply chain consists of product suppliers, and non-product goods and services. We ensure that we do not knowingly engage with any supplier who violates local or international laws and regulations, including those pertaining to environmental and employment standards.

The raw materials and systems required to manufacture silicone and rubber components are procured from suppliers around the world and vary from product to product. Most of these materials and systems are provided by suppliers with which STARLIM has long-term contracts. STARLIM seeks long-term relationships with major direct suppliers for the delivery of materials and major systems to manufacture and deliver components to customers.

STARLIM currently does business with approximately 60 suppliers located in 8 countries (Austria, Canada, China, Germany, Italy, Japan, UK, USA).

Policies and Due Diligence

STARLIM has done the following:

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships

The STARLIM group's commitment to prevent forced labour and child labour in its business and supply chains is underpinned by appropriate policies. The policies and procedures are applied to all operations within the Corporation or as otherwise stated in the table below. These include Human Rights, Health and Safety and Violence & Harassment in the Workplace. The Corporation also has recruitment practices in place to ensure all applicants are recruited voluntarily.

We have a zero-tolerance policy for human right abuses as outlined in our policies. The Corporation fosters a positive and productive work environment where diversity is valued, corporate culture is embraced, expectations and practices are set, and our employees are driven to continually strive for personal and professional growth.

2024-2025 Modern Slavery Statement

The following Corporate Policies and Commitments speak to our commitment to eliminating forced labour and child labour in our company and supply chain.

Policy	Purpose	Application	Reference
Global Code of Conduct (COC)	Standard to which all STARLIM companies are obligated to conduct its business. Covers topics such as adherence to local and international laws, corruption and bribery, confidentiality, privacy, human rights, prohibition of child or forced labour, minimum age for employment and fairness.	Applies to all STARLIM companies	D.N.CEO.001.E.01 https://www.starlim-sterner.com/en/compliance/
Supplier Agreement (GTC)	Sets out the expectation and policies all suppliers must adhere to	Applies to all STARLIM group companies	D.RS.LS.049E https://www.starlim-sterner.com/en/gtc/
Whistleblower Policy	Maintain an ethical workplace without the fear of reprisal should someone or group behave in a manner contrary to corporate policies	Each jurisdiction has its own policy covering key elements	D.N.CEO.010.E.01 D.P.G.008E
Policy Anti-Child Labour	Preventing the use of child labour in our workplace and eliminating it in our supply chain	Applies to Starlim North America Corporation	D.N.CEO.008.E.03
Employee Handbook	Details human resource practices and policies which at minimum follow the ESA standard	Applies to Starlim North America Corporation and Poly-Nova Technologies Corporation	H.A.N.FOH.001.E.04 D.P.HR.001E
Human Resources Recruiting	Details human resource practices and procedures for recruiting (including age requirements for work, hours of work etc.) which at minimum follow the ESA standard	Applies to Starlim North America Corporation and Poly-Nova Technologies Corporation	PR.N.FO.6.2.1.E PR.PHR.002

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2024-2025 Modern Slavery Statement

Worker protection/Health and Safety of workers	Policies and procedures ensuring the health and safety of employees are prioritized	Applies to Starlim North America Corporation and Poly-Nova Technologies Corporation	D.N.CEO.001.E 01 D.N.CEO.004.E 03 PNT EHS Program
Employee Work Refusals and Health and Safety	Describes the ability of all employees to refuse work that they deem unsafe	Applies to Starlim North America Corporation and Poly-Nova Technologies Corporation	PP-SNA-5.8.E PR.N.FOHS.005.E 01 TD.P.OHS 3.01
Contractor Standards	Defines the expectations our corporation has for hired contractors and the requirement for doing business with STARLIM companies.	Applies to Starlim North America Corporation and Poly-Nova Technologies Corporation	PP-SNA-6.14.E PR.P.OHS 3.05

Policies can be requested through compliance@starlim.com

Risks in Supply Chain

STARLIM supports the efforts of governments and organizations to end violence in conflict-affected areas. STARLIM is therefore committed to sourcing its minerals and components from companies that also share our values regarding human rights, ethics, and environmental responsibility.

We want to make informed sourcing decisions, which is why we support the Responsible Minerals Initiative (RMI) and review whether tin, tantalum, tungsten, and gold (3TG), cobalt, or natural mica in our products originate from conflict-affected and high-risk regions.

We identify potential sourcing risks affecting our products and proactively require all minerals in our supply chain to be conflict-free.

Natural mica represents a small amount of our raw material usage by volume. Our approach continues to focus on sourcing natural mica from approved suppliers as per the RMI. One hundred percent of the natural mica we sourced in the Reporting Period came from certified manufacturers in the United States.

STARLIM has identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

Risk Assessment

The Corporation uses a risk-based approach to assess and manage its risk of forced labour and child labour. Our approach helps us prioritize our efforts and adjust our actions.

STARLIM uses the STRT data exchange template to evaluate our risk in the areas of slavery, human trafficking, and child labour in our supply chain. The STRT is a widely used, universally accepted standard data exchange template for slavery, human trafficking, and child labour.

2024-2025 Modern Slavery Statement

The STRT is updated annually by a multi-stakeholder Development Committee to ensure it is consistent and current with industry needs.

The STRT supports organizations with their compliance efforts under all major supply chain-related legislation focused on slavery, human trafficking, and child labour. Some of these regulations are:

- The US Federal Acquisition Regulation (FAR) final rule on Combating Trafficking in Persons (52.222-50)
- The UK Modern Slavery Act (Section 54 – Transparency in Supply Chains)
- The California Transparency in Supply Chain (SB657)
- The EU Non-Financial Reporting Directive
- The French Loi relative au devoir de vigilance des sociétés mères et des entreprises donneuses d'ordre (Loi 2017-399)
- Countering America's Adversaries Through Sanctions Act (Title III)
- The Australia Modern Slavery Act (No. 153, 2018)
- Section 307 of the US Tariff Act and related regional-specific acts
- The Canadian Customs Tariff Act (No. 9897.00.00)
- Lieferkettensorgfaltspflichtengesetz (German Act on Corporate Due Diligence Obligations in Supply Chains)
- Åpenhetsloven (Norwegian Transparency Act)
- Article 964 of the Swiss Code of Obligations (Obligationenrecht) (Swiss Conflict Minerals and Child Labour Due Diligence Ordinance)

The STRT also helps organizations make disclosures regarding internationally accepted forced labour and child labour indicators linked to sustainability reporting frameworks such as the Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB).

Based on the risk assessments completed for the reporting period, STARLIM considers the risk of modern slavery in our operations and supply chains to be low as indicated by the STRT risk assessment.

Remediation

STARLIM has not identified any forced labour or child labour in our activities and supply chains. To date there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

If a situation of non-compliance is identified, STARLIM will work to develop and implement a corrective plan to improve and remedy the situation. Corrective action would include measures to remediate the loss of income to vulnerable families.

Training

Our employees receive regular tailored training on ethical topics and our policies. All new employees are assigned an onboarding training package which includes mandatory training on the policies and procedures mentioned in this report. In 2024, we provided training to our management and supply chain staff on the issues of forced labour and child labour, incorporating the content from our 2023/24 report.

Employees of STARLIM are always strongly encouraged to report actual or perceived violations of STARLIM's Global Code of Conduct.

Effectiveness Assessment

STARLIM intends to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains at a later stage and will develop and implement procedures to track such performance.

Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: Thomas Bründl

Title: CEO BETA Beratungs- und Beteiligungs-GmbH, FSS Vermoögensverwaltung GmbH

Date: 28/05/2025

Signature:

I have the authority to bind 1510349 Ontario Limited, BETA Beratungs- und Beteiligungs-GmbH and FSS Vermoögensverwaltung GmbH

Full name: Vijai Lakshmikanthan

Title: CEO Starlim North America Corporation

Date: 28/05/2025

Signature:

I have the authority to bind Starlim North America Corporation

Handwritten initials and signatures in blue ink at the bottom right of the page.

2024-2025 Modern Slavery Statement

Full name: Kirk Brownell

Title: General Manager

Date: 28/05/2025

Signature: 
Poly-Nova Technologies Corporation

Full name: John Timmerman

Title: President

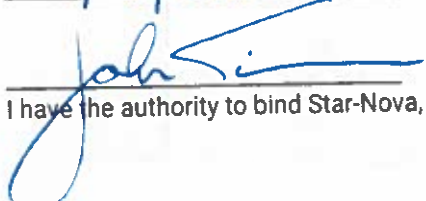
Date: 28/05/2025

Signature: 
I have the authority to bind Poly-Nova Technologies Corporation

Full name: John Timmerman

Title: President

Date: 28/05/2025

Signature: 
I have the authority to bind Star-Nova, Inc.