

2024 Report on our Commitment to the Fight Against Modern Slavery

This report is prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) (in effect since January 1, 2024). It sets out the commitment, renewed annually, of Hendrickson and its subsidiaries targeted by the legislation (collectively, “Hendrickson”, “we” and “our”) to prevent modern slavery, child labour, forced labour, and human trafficking in all activities and relationships with partners. It describes the measures in place at Hendrickson to achieve this.

Hendrickson’s Structure, Activities, and Supply Chain

Our Structure

Founded in 1913, Hendrickson builds value for our employees, customers, and stakeholders by delivering timely, cost-effective ride solutions to advance the global commercial transportation industry.

Hendrickson is incorporated in the United States with its headquarters in Woodridge, IL. It employs more than 6,000 people worldwide with over 300 employees in Canada. Hendrickson’s Canadian operations include 3 locations including:

- **Hendrickson Spring Stratford, ON – Hendrickson Canada ULC**
- **Hendrickson Trailer Canada Mississauga, ON – Hendrickson Canada ULC**
- **Brunner Niagara Falls – Hendrickson Niagara Falls ULC**

Hendrickson’s parent company is The Boler Company located in Schaumburg, IL. The Boler Company is privately held.

Our Activities

Hendrickson is a leading global manufacturer and supplier of medium- and heavy-duty mechanical, elastomeric and air suspensions; integrated and non-integrated axle and brake systems; tire pressure control systems; auxiliary lift axle systems; parabolic and multi-leaf springs; stabilizers; bumpers; and components to the global commercial transportation industry. Every day around the world, millions of Hendrickson suspensions carry countless loads of freight and raw materials both on- and off-highway. We supply durable, lightweight, high-performing suspension systems and components to the major North and South American, European, Asian, and Australian medium- and heavy-duty truck and trailer OEMs, fleets, and dealers. Hendrickson’s growing global position in the commercial transportation industry and its ongoing drive to provide products and services benefit truck and trailer manufacturers, fleets, and owner-operators. Our tagline, The World Rides On Us®, reflects not only the spirit of the brand but also Hendrickson’s 100-plus years of being driven by quality.

Our Policies and Due Diligence Process in Relations to Forced Labour and Child Labour

Hendrickson has a zero tolerance for forced labour and child labour. We adhere to the United States Government Federal Regulation 52.555-50, Combating Trafficking in Persons, Australian Modern Slavery Act of 2018, the United Kingdom’s Modern Slavery Act of 2015, along with Canada’s new Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Code Of Conduct

Hendrickson adheres to the Boler Global Code of Business Conduct (the “Code”), which sets out the guiding principles for all Boler owned companies. The Code clearly states that all employees, officers, and board of directors of The Boler Company and each of its subsidiaries and entities must comply with the Code along with all laws and regulations where we do business. The Code also states all employees are expected to know their personal responsibilities which include:

- Always act in a professional, honest, and ethical manner when acting on behalf of the Company.
- Know the information in the Code and policies.



Code Of Conduct (cont'd.)

- Complete all required employee trainings in a timely manner and keep up-to-date on current standards and expectations.
- Report any concerns about possible violations of laws, regulations, or the code to your supervisor, Human Resources, or a member of the Corporate Compliance Committee.

Statement on Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking. Each of us can help support efforts to eliminate inhumane abuses such as child labour, slavery, human trafficking, and forced labour.

We as employees are to make sure to:

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.
- Remember that respect for human dignity begins with our daily interactions with one another, our business partners, and our customers.

Hendrickson Policy INT615

Hendrickson Policy INT615 is Anti-Trafficking in Persons Policy. It applies to all employees of The Boler Company, Hendrickson Holdings, L.L.C. and each of its subsidiaries. Hendrickson Policy INT615 complies with U.S. Federal Acquisition Regulations 52.555-50, Combatting Trafficking in Persons.

Due Diligence Process

Hendrickson has had no reported issues of forced or child labour. This does not mean it is not possible, so we continue to focus on several due diligence measures.

Reporting

Vendors are expected to report any violations of the Code to the Company immediately. The Global Vendor Code of Conduct supplies numerous avenues for reporting, including Hendrickson's Global Code of Business Conduct Hotline and the Global Human Trafficking Hotline number.

Global Vendor Code of Conduct Compliance

Hendrickson will not tolerate violations or circumvention of any laws of the United States or a foreign country by a vendor or its representatives. Nor will the Company tolerate the disregard or circumvention of corporate policy or the engagement in unethical dealings in connection with the Company's business. The Company will terminate its relationship with any vendor who fails to comply with this Code or fails to cooperate with any related investigation. Vendors agree that its representatives will fully comply with the Company's policies, practices and rules including this Code. Vendors are responsible for the actions of their representatives.

Measures Taken to Remediate Any Forced Labour or Child Labour

No instances of modern slavery, child labour, servitude, forced or compulsory labour, or human trafficking have been detected or reported to Hendrickson. We do however continue to maintain reporting mechanisms.

Reporting Infractions

Hendrickson has a Global Code of Business Conduct Hotline for any Code violation to be reported. Violations can be submitted anonymously. The hotline consists of 15 different phone numbers to ensure each area Hendrickson does business has a direct number. To assist in communication, the numbers are published in the Global Code of

Reporting Infractions (cont'd.)

Hendrickson has a Global Code of Business Conduct Hotline for any Code violation to be reported. Violations can be submitted anonymously. The hotline consists of 15 different phone numbers to ensure each area Hendrickson does business has a direct number. To assist in communication, the numbers are published in the Global Code of Business Conduct, the Global Vendor Code of Conduct, and are posted in every Hendrickson building. Individuals may also report violations to the Human Resources team, or the Corporate Compliance Committee.

Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families That Results From Any Measure Taken to Eliminate the Use of Forced Labour or Child Labour in Our Activities and Supply Chains.

As no instances of modern slavery, child labour, servitude, forced or compulsory labour, or human trafficking have been detected or reported to Hendrickson, and while we continue to maintain reporting mechanisms, no measures have yet been required to remediate any loss of income to the most vulnerable families that resulted from any measure taken to eliminate the use of forced labour of child labour in our activities and supply chains.

Training

Each year the Corporate Compliance Committee approves and publishes the corporate compliance training schedule. In 2024 this schedule includes:

- Global Code of Business Conduct training
- Intellectual Property training
- Anti-Trafficking in Persons training
- Anti-Trust & Anti-Bribery training
- Prevention of Sexual Harassment
- Export compliance

Global Code of Business Conduct and Anti-Trafficking in Persons training is a requirement for all employees. For employees with company-issued computers, these trainings are conducted via e-learning. For employees that do not have company-issued computers, the trainings are held in-person.

Assessment of Our Effectiveness in Ensuring that Forced Labour and Child Labour Are Not Being Used In Our Business and Supply Chains

In 2023, no instances of modern slavery or human trafficking involving our suppliers were detected or reported. During 2023 we reviewed and updated our Global Code of Business Conduct, along with our Global Vendor Code and anti-trafficking training material. The Corporate Compliance Committee continued to meet quarterly along with reporting to the Boler Board of Directors quarterly.

We also carried out control assessments of our suppliers and regularly visit them to ensure they are meeting our standard of business.

In 2024 we will continue the above items, along with reviewing our Anti-Trafficking policy, updating it to include global legislative changes.

Conclusion

Hendrickson is committed to preventing and fighting all forms of modern slavery and human trafficking in our business and supply chains. We will continue to regularly review our processes, policies, and practices in order to continually identify opportunities for improvement.

Review and Approval

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. 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.

I have the authority to bind Hendrickson,

A handwritten signature in black ink that reads "Matt Joy". The signature is written in a cursive style with a long horizontal line extending from the top of the "J".

Matt Joy
President and CEO Hendrickson
May 6, 2024