



KNAPE & VOGT

To: Knap & Vogt Manufacturing Company Customers and Stakeholders
From: Larry Prange, General Counsel
Date: May 30, 2024
Subject: Bill S-211 Forced Labour in Canadian Supply Chains

Knap & Vogt Manufacturing Company (“**Knap & Vogt**”), presents the following report in compliance with Bill S-211 Forced Labour in Canadian Supply Chains (referred to herein as “**the Act**”).

FY2023 Annual Report

Identifying Information

1. Reporting Entity’s Legal Name: Knap & Vogt Manufacturing Company
2. Financial Reporting Year: FY2023
3. Revised Report: No, this is an initial report.
4. Business Number: 82838 1350 RT0001
5. Joint Report: No, this report covers Knap & Vogt activities only.
6. Reporting Obligations in Other Jurisdictions: In addition to compliance with the Act, Knap & Vogt is also subject to and maintains compliance with California’s Transparency in Supply Chains Act.
7. Entity Categorization According to the Act:
 - a. Knap & Vogt has a Canadian business presence, in that it does business in Canada.
 - b. Knap & Vogt generated at least \$40 million in revenue for at least one of its two most recent financial years.
 - c. Knap & Vogt employed at least 250 employees for at least one of its two most recent financial years.
8. Sector/Industry: Manufacturing
9. Location: United States of America

Requirements of Section 11 of the Act

10. Steps taken in FY2023 to prevent and reduce risks of forced labour and child labour, as per subsection 11(1) of the Act:
 - a. Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.
 - b. Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and child labour in Knap & Vogt’s activities and its supply chains.
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- c. Developing and implementing child protection policies and processes.
- d. Developing and implementing anti-forced labour and anti-child labour standards, codes of conduct, and compliance checklists.
- e. Auditing suppliers for compliance with anti-forced labour and anti-child labour standards and laws.

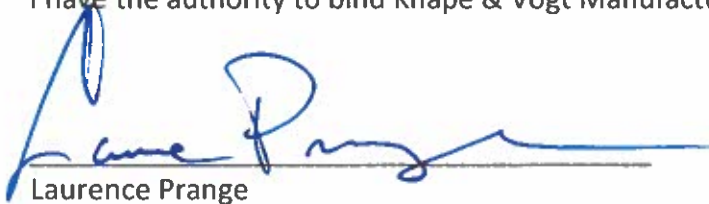
11. Supplementary information addressing each of the seven requirements in subsection 11(3) of the Act:

- a. **Structure, Activities and Supply Chains;**
 - i. **Structure:** Knapé & Vogt is a corporation incorporated in the state of Michigan.
 - ii. **Activities:** Knapé & Vogt produces goods outside Canada, sells goods both in and outside of Canada, distributes goods both in and outside of Canada, and imports goods into Canada that are produced outside Canada.
 - iii. **Supply Chains:** Knapé & Vogt's manufacturing facility is located in Grand Rapids, Michigan. Our supply chain includes both imported and domestic goods, including the purchase of raw steel, finished plastics, small hardware elements such as screws, springs and various fasteners, and some finished hardware products.
- b. **Policies and due diligence processes in relation to forced labour and child labour;**
 - i. Knapé & Vogt performs a pre-engagement survey and audit of potential suppliers to ensure compliance with anti-forced labour and anti-child labour policies and laws.
 - ii. Knapé & Vogt conducts periodic audits of existing suppliers to ensure continued compliance with anti-forced labour and anti-child labour policies and laws.
- c. **Identifying parts of the business and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk;**
 - i. Knapé & Vogt has not formally identified such specific risks, however we review all parts of the supply chain for compliance.
- d. **Measures taken to remediate any forced labour or child labour issues;**
 - i. Not applicable, as Knapé & Vogt has not identified any forced labour or child labour in our activities and supply chains.
- e. **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 its activities and supply chains;**
 - i. Not applicable, as Knapé & Vogt has not identified any 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 its activities and supply chains.
- f. **Training provided to employees on forced labour and child labour;**

- i. Knape & Vogt's procurement team has received mandatory training on elements to look for when auditing a supplier or potential supplier's facilities.
- g. Assessing effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.
 - i. Knape & Vogt does not currently have a process in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

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 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 Act, for the reporting year listed above."

I have the authority to bind Knape & Vogt Manufacturing Company.



Laurence Prange
General Counsel
30 May 2024

