



## Report for Canadian Forced Labour in Supply Chains Act

*Fiscal Year Ended December 31, 2025*

### IDENTIFYING INFORMATION

- **Reporting entity's legal names:** Axalta Coating Systems Canada Company, U-POL Canada Limited, Pro Form Products Limited, and Transtar Autobody Technologies LLC
- **Financial reporting year:** Fiscal year ending December 31, 2025
- **Business number(s), if applicable:** 1) Axalta Coating Systems Canada Company - 81952 2707 RC0001 2) U-POL Canada Limited - 76740 4718 RC0001 3) Pro Form Products Limited - 10432 0254 RC0002 4) Transtar Autobody Technologies LLC - 85796 2138 RC0001
- **Identification of reporting obligations in other jurisdictions:**
  - California Transparency in Supply Chain Act of 2010 (United States)
  - United States Tariff Act of 1930
  - Uyghur Forced Labor Prevention Act (United States)
  - Australian Commonwealth's Modern Slavery Act of 2018
  - German Supply Chain Diligence Act
  - UK Modern Slavery Law
  - French Corporate Duty of Vigilance Law
- **Entity categorization according to the Act:** Entity (*non-government institution*)
- **Sector/industry:** Manufacturing
- **Locations:**

Axalta Coating Systems Canada Company  
1915 Second Street W  
Cornwall ON K6H 5R6

U-POL Canada Limited  
1212 - 1175 Douglas Street  
Victoria, BC V8W 2E1

Pro Form Products Limited  
604 McGeachie Drive  
Milton ON L9T 3Y5

Transtar Autobody Technologies LLC  
2040 Heiserman Drive  
Brighton MI 48114

## **I. INTRODUCTION**

This joint report is submitted on behalf of Axalta Coating Systems Canada Company (“Axalta Canada”), U-POL Canada Limited (“U-POL”), Pro Form Products Limited (“Pro Form”), and Transtar Autobody Technologies LLC (“Transtar” (collectively for purposes of this report, “Axalta”)). Axalta is committed to responsible sourcing. Axalta abhors and condemns human rights abuses including child labor, forced labor, and slave labor. Axalta requires its suppliers to do business ethically and adopt sound human rights practices, to treat workers fairly, with dignity and respect, to eliminate human trafficking and slavery risks, and to provide their workers with a safe and healthy workplace.

Axalta also requires its suppliers to comply with applicable environmental laws, regulations, and permits. Our suppliers are expected to support Axalta’s efforts to operate sustainably by developing, implementing, and maintaining environmental best practices to reduce and minimize air emissions, wastewater discharges, waste generation, biodiversity loss, and ensure operations do not adversely impact the communities where they operate.

## **II. AXALTA’S STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS**

Axalta consists of two business segments: Performance Coatings and Mobility Coatings. The Performance segment sells products into both the vehicle refinish end market and the industrial end market (including general industrial, architectural, transportation, and building product coatings). The Mobility segment sells products into the light and commercial vehicle coating original equipment manufacturer end market. Axalta sources from approximately 14,000 suppliers in 35 countries and has approximately 45 manufacturing facilities (including 3 JV sites) worldwide. One of these manufacturing facilities is located in Cornwall, Ontario, Canada. Axalta also has 4 major technology centers and 48 customer training centers globally. Of these customer training centers, Axalta Refinish Academies are located in Vaughan, Ontario, Pointe-Claire, Quebec, and Vancouver, British Columbia, Canada.

## **III. AXALTA’S POLICIES AND DUE DILIGENCE PROCESSES RELATED TO FORCED/CHILD LABOR**

Axalta’s Supplier Code of Conduct (“Code”) was first adopted in 2016 and was most recently revised in September of 2024 to ensure compliance with global supply chain transparency laws. All Axalta suppliers are required to be familiar with the Code and are similarly required to take appropriate steps to ensure compliance with the Code. The Code generally requires Axalta’s suppliers to act in compliance with all applicable laws, do business ethically, and provide a workplace free from discrimination and harassment. More specifically, the Code prohibits suppliers from using child labor, forced labor, engaging in human trafficking or any form of modern slavery, requires suppliers to pay reasonable remuneration, wages, and benefits, and requires suppliers to provide a safe work environment. The Code lists approximately 50 “High

Risk Countries” where the risks of supplier use of forced labor and/or child labor is believed by Axalta to be greater than the risk present in the rest of the world generally. Pursuant to the Code, suppliers in High Risk Countries may be subjected to additional screening including enhanced self-assessment questionnaires, targeted “Know Your Supplier” visits by Axalta personnel, and/or third-party audits of one or more supplier locations within High Risk Countries.

Axalta’s standard supplier contract requires suppliers to warrant their compliance with, inter alia, applicable laws including minimum age, wage, and hour standards. Historically, all Axalta suppliers have gone through an onboarding process that includes an initial supplier assessment. Suppliers are subsequently further assessed for numerous risks and screened on the expectations in the Code.

Suppliers that provide us raw materials that contain certain minerals that may present higher risk of modern slavery, including cobalt, mica, and 3TG minerals - tin, tungsten, tantalum, and gold, are required to trace their supply chains, provide mineral reporting templates annually, and demonstrate the minerals in the materials provided to us were sourced free of human rights abuses. Axalta also actively supports and participates in the Responsible Minerals Initiative, which works to advance responsible sourcing practices and eradicate modern slavery in mineral supply chains. For more information please review our Responsible Minerals Policy.

Axalta’s Human Rights Policy is aligned with the principles of the United Nations Global Compact and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. This policy requires all Axalta personnel, all current and prospective suppliers, and all other business partners and relevant parties to adhere to the values expressed in the Policy, including but not limited to, prohibitions against child/underage labor, human trafficking, forced/prison labor, inhumane disciplinary practices, and unreasonable wages/working hours. For more information please review our Human Rights Policy.

Suppliers are required to comply with applicable environmental laws and regulations. Suppliers must also comply with all required environmental permits. Suppliers are expected to support Axalta’s efforts to operate sustainably by developing, implementing, and maintaining environmental best practices to reduce and minimize air emissions, greenhouse gas emissions, wastewater discharges, waste generation, biodiversity loss, and ensure operations do not adversely impact the communities where they operate.

Axalta’s suppliers are required to comply with all applicable occupational safety and health laws and regulations while ensuring that employees are provided with a safe and healthy workplace. Axalta’s suppliers’ employees are expected to have the right to refuse to work in unsafe conditions and/or to report unsafe or unhealthy working conditions without fear of retribution. Suppliers are expected to provide employees with accessible and clean restroom facilities, clean potable water, and adequate living standards for employees housed in onsite dormitories or other employer-provided housing.

Active suppliers are subject to continuous assessment and are expected to communicate Axalta's requirements to their own suppliers and subcontractors and take reasonable steps to ensure alignment with the principles set out in our Supplier Code of Conduct.

#### **IV. BUSINESS AND SUPPLY CHAIN FORCED/CHILD LABOR RISKS, ASSESSMENT, AND MANAGEMENT**

Axalta's standard supplier contract and its Supplier Code of Conduct both reserve Axalta's right to conduct on-site audits of its suppliers. These audits may evaluate the compliance with laws and the expectations in the Code, including eradication of human trafficking and slavery. Axalta may conduct such audits through its own personnel (or through a third-party independent auditor) on either an announced or unannounced basis. Axalta may screen both prospective and current suppliers on the expectations outlined in the Code. Where non compliance is identified, Axalta seeks to work with suppliers to implement appropriate corrective action plans within defined timeframes. Where remediation is not possible or where severe violations persist, Axalta may suspend or terminate the business relationship.

Axalta recognizes that certain human rights risks—such as forced labor, child labor, human trafficking, excessive working hours, and unsafe working conditions—may be more prevalent in specific geographies, commodities, or tiers of the supply chain. Axalta uses a risk based approach to prioritize due diligence efforts where the risk of adverse impacts is higher. Axalta has adopted a list of approximately 50 "High Risk Countries" where the risks of supplier human rights violations is believed by Axalta to be greater than the risk present in the rest of the world generally. Pursuant to Axalta's Code, suppliers in High Risk Countries may be subjected to additional screening including enhanced self-assessment questionnaires, targeted "Know Your Supplier" visits by Axalta personnel, and/or third-party audits of one or more supplier locations within High Risk Countries.

Axalta maintains reporting and whistleblower mechanisms that allow employees and third parties, including suppliers and their workers, to raise concerns related to human rights, ethics, or legal compliance in good faith and without fear of retaliation. Reported concerns are reviewed and addressed in accordance with Axalta's established investigation and remediation procedures. These mechanisms are described further in Axalta's Code of Business Conduct and Ethics.

During the reporting period, Axalta identified and assessed a supply chain risk associated with possible supplier use of forced labor. Axalta temporarily discontinued sourcing from this supplier while a thorough investigation was conducted. In the course of the investigation, the supplier in question provided information sufficient to reasonably conclude there was, in fact, no forced labor. Ultimately, Axalta determined that the matter had been appropriately resolved and sourcing was restarted. Axalta continues to enhance its risk-based due diligence processes and supplier oversight practices.

## **V. MEASURES TO REMEDIATE ANY FORCED/CHILD LABOR**

Not applicable for the reporting period.

## **VI. REMEDIATION OF LOST INCOME RESULTING FROM MEASURES TO ELIMINATE ANY FORCED/CHILD LABOR**

Not applicable for the reporting period.

## **VII. SUPPLIER ENVIRONMENTAL, HEALTH, AND SAFETY**

Suppliers are required to comply with applicable environmental laws and regulations. Suppliers must also comply with all required environmental permits. Suppliers are expected to support Axalta's efforts to operate sustainably by developing, implementing, and maintaining environmental best practices to reduce and minimize air emissions, greenhouse gas emissions, wastewater discharges, waste generation, biodiversity loss, and ensure operations do not adversely impact the communities where they operate.

Axalta's suppliers are required to comply with all applicable occupational safety and health laws and regulations while ensuring that employees are provided with a safe and healthy workplace. Axalta's suppliers' employees are expected to have the right to refuse to work in unsafe conditions and/or to report unsafe or unhealthy working conditions without fear of retribution. Suppliers are expected to provide employees with accessible and clean restroom facilities, clean potable water, and adequate living standards for employees housed in onsite dormitories or other employer-provided housing.

Active suppliers are subject to continuous assessment and are expected to communicate Axalta's requirements to their own suppliers and subcontractors and take reasonable steps to ensure alignment with the principles set out in our Supplier Code of Conduct.

## **VIII. EMPLOYEE TRAINING**

On an annual basis, all Axalta employees must complete training on the Axalta Code of Business Conduct and Ethics. Axalta's Legal and Compliance team also conducts targeted training sessions on a variety of compliance topics, including those relating to human rights. Training content is reviewed periodically and updated as appropriate to reflect evolving regulatory requirements, emerging human rights risks, and lessons learned from Axalta's due diligence activities.

Axalta currently provides focused training to our global procurement staff that work directly with our supply chain partners. This training focuses on the identification of supply chain and ESG risks. Axalta has developed and implemented an enhanced "Know Your Supplier" training to ensure that Axalta personnel (including but not limited to selected supply chain and sourcing personnel) are aware of each of the risk areas covered by the Supplier Code of Conduct. Axalta's "Know Your Supplier" training instructs personnel of the various warning signs of human rights

abuses, forced labor, child labor, human trafficking, environmental non-compliance and unsafe workplaces which may be observed during visits to supplier facilities. Axalta personnel are also trained in proper reporting and escalation procedures so that any warning signs that may be observed can be thoroughly investigated and promptly remedied as appropriate.

#### **IX. ASSESSING THE EFFECTIVENESS OF AXALTA'S POLICIES**

Key performance indicators of the effectiveness of Axalta's human rights related efforts include:

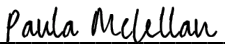
- The number of suppliers assessed annually, on-site audits, "Know Your Supplier" visits, and other means;
- The number of potential Supplier Code of Conduct compliance issues identified annually through any means; and
- Verification of timely implementation of appropriate corrective actions.

Each of these key performance indicators will be assessed annually to identify opportunities to improve Axalta's policies and/or due diligence processes. Signs that changes or improvements might be warranted may include the presence or absence of identified compliance issues and metrics related to corrective action implementation.

## **X. APPROVAL OF REPORT AND ATTESTATION**

*In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Board Member, attest that I have reviewed the information contained in the report on behalf of the governing body of Axalta Coating Systems Canada Company 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 within this report.*

Paula McLellan  
Board Member, Axalta Coating Systems Canada Company  
May 27, 2026

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Signature

*I have the authority to bind Axalta Coating Systems Canada Company.*

*In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Board Member, attest that I have reviewed the information contained in the report on behalf of the governing body of U-POL Canada Limited 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 within this report.*

Paula McLellan  
Board Member, U-POL Canada Limited  
May 27, 2026

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Signature

*I have the authority to bind U-POL Canada Limited.*

*In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Board Member, attest that I have reviewed the information contained in the report on behalf of the governing body of Pro Form Products Limited 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 within this report.*

Paula McLellan  
Board Member, Pro Form Products Limited  
May 27, 2026

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91E533F83942475...

Signature

*I have the authority to bind Pro Form Products Limited.*

*In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Board Member of Axalta Coating Systems UK Limited, attest that I have reviewed the information contained in the report on behalf of the entity Transtar Autobody Technologies LLC (a wholly owned subsidiary of Axalta Coating Systems UK Limited) 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 within this report.*

Laura Youens,  
Board Member, Axalta Coating Systems UK Limited  
May 27, 2026

  
Signature

*I have the authority to bind Transtar Autobody Technologies LLC.*