



Canada's Fighting Forced Labour and Child Labour in Supply Chains Report OPEX Corporation

Report Required By May 31, 2025

Covering Fiscal Year: October 1, 2023 through September 30, 2024

As a manufacturer of goods produced outside of Canada that are sold in Canada, OPEX Corporation ("OPEX Corporation" or "OPEX") is submitting this report in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

STRUCTURE AND ACTIVITIES

OPEX Corporation is a New Jersey corporation headquartered in Moorestown, New Jersey. OPEX was incorporated in the State of New Jersey in 1973 and remains a privately held company owned by the Stevens family.

For nearly fifty years, OPEX has manufactured its products exclusively in the United States and currently employs several hundred employees at its manufacturing facilities in Moorestown, New Jersey, Pennsauken, New Jersey, and Plano, Texas. Given that OPEX assembles its products entirely within the United States, OPEX is subject to U.S. federal, state, and local laws, including applicable labour laws.

OPEX also maintains sales and service offices in Bolton, England, Villebon-sur-Yvette, France, and Duisburg, Germany.

Regarding Canada, OPEX exports OPEX-branded equipment (i.e., document and mail automation equipment and warehouse automation) to commercial and governmental customers. OPEX does not maintain any offices in Canada, but the company does employ a small handful of Canadian service technicians who are tasked with installing, commissioning, maintaining, and repairing OPEX equipment sold to Canadian customers.

OPEX, at its U.S. manufacturing facilities, manufactures the majority of the parts used in OPEX products. As a result, OPEX can ensure -- directly and on a first-hand basis -- that forced labour¹ is not used in the manufacture of such parts. Moreover, the raw materials that OPEX uses for such parts come predominantly from suppliers and/or distributors based in the U.S., and thus the production and/or supply of such raw materials are subject to rigorous U.S. labour and other regulations.

Regarding those parts that OPEX does not manufacture itself, OPEX procures such parts from numerous distributors and manufacturers located throughout the world. OPEX's anti-forced labour program focuses primarily on such suppliers.

¹ The terms "forced labor" and "modern slavery," as used in this report, are intended to encompass the concepts of "slave labor," "compulsory labor," "human trafficking," "child labor," etc.

POLICIES AND DUE DILIGENCE

OVERVIEW: OPEX strives to make ethical business choices when it comes to preventing forced labour, and the company will not knowingly support or deal with any entity that engages in forced labour.

For many years, OPEX has had in place an anti-forced labour program designed in substantial part to respond to the State of California's and the United Kingdom's anti-forced labour regulations. The cornerstone of that program can be found in OPEX's *Corporate Code of Ethics and Conduct*, which includes the following section:

“Forced and Child Labour: Suppliers must comply with all applicable federal, state, and other laws and regulations prohibiting forced labour, slavery, and human trafficking. Furthermore, suppliers must not engage in, support or deal with any other business or person that engages, in the foregoing activities.

Suppliers must not use child labour. The term “child” refers to any person employed under the age of 15 or the minimum age for employment in the country where work is performed, whichever is higher. OPEX supports the use of legitimate workplace apprenticeship programs which comply with all applicable laws and regulations.”

GENERAL: At a high level, below are some of the steps that OPEX takes to ensure compliance with the company's anti-forced labour program:

Supply Chain Verification: OPEX's suppliers are expected to comply with applicable federal, state, and other laws, including those that address forced labour. OPEX's *Supplier Code of Conduct and Ethics* expressly requires such compliance. If OPEX is informed or otherwise becomes aware of a concern with a supplier, the Company reserves the right to request remediation of the concern, or the supplier faces the prospect of termination of its supply arrangement.

Supplier Audits: OPEX reserves the right to audit our suppliers' compliance with all applicable forced labour laws. Moreover, on an annual basis, OPEX reviews the online statements of a select list of the Company's suppliers regarding their prevention of forced labour. If an online statement does not exist for one or more of the selected suppliers, we may review other public materials available online for possible reports of the supplier having violated forced labour laws.

Supplier Certifications: OPEX manufactures a large proportion of the parts that go into our products. If OPEX sources parts from outside the company, OPEX generally prefers to source such materials and parts from domestic suppliers located in the United States. Regardless of whether OPEX sources materials or parts from domestic or international suppliers, the Company expects suppliers to abide by applicable national, state/provincial, local, and international laws in the manufacture and distribution of materials supplied. OPEX may require some suppliers, as part of an OPEX survey or questionnaire, to certify that their materials and parts will comply with forced labour laws.

Supplier Accountability Programs: OPEX works to develop and maintain business relationships with suppliers that share our commitment to conduct business in a responsible and legally compliant manner. OPEX's Corporate Principles include obligations to "conduct all business fairly and honestly" and to "recognize the value of the individual." If OPEX becomes aware of actions or conditions that are not in compliance with those principles or applicable law, including but not limited to violations of forced labour laws, we reserve the right to seek remediation.

Employee Training: All OPEX employees are required to comply with our policies, employee manuals, and other similar documents. Such documentation includes provisions addressing legally permissible and impermissible labour practices. We also post at our facilities in the U.S. -- at various locations accessible to all U.S. employees -- posters or other statements discussing prohibitions against child labour, prohibitions against retaliating against employees who report labour law violations, the payment of proper wages, and other related topics that may bear upon forced labour laws.

ADDITIONAL DETAILS: More specifically, OPEX has within the past year undertaken the steps below aimed at combating the use of forced labour in its supply chains, with a mind toward achieving improved compliance during the upcoming year:

1. *Review of OPEX's Prior-Year Forced Labour Audit Report:* The OPEX Legal Department shared OPEX's forced labour audit report (2023-2024) with the management of the OPEX Purchasing organization, for their review. An internal meeting between the OPEX Purchasing organization and internal compliance personnel was held to discuss the initial findings and next steps.
2. *Appointment of A New OPEX Purchasing "Champion"; Training:* The OPEX Purchasing organization assigned oversight of its forced labour-related responsibilities to a team member so that a member of that organisation could take more of an active, day-to-day role in the Purchasing organization's forced labour-related compliance efforts.
3. *Surveying OPEX Purchasing Team Members:* The OPEX Purchasing organization sent questions to all OPEX Purchasing organization team members asking whether they are aware of any OPEX supplier engaging in forced labour, any supplies coming from suppliers located in the Xinjiang Uyghur Autonomous Region (Xinjiang) of the People's Republic of China (PRC), etc.
4. *Review of OPEX's Forced Labour Policy:* The OPEX Legal Department reviewed and confirmed that OPEX's *Global Modern Slavery Policy & Procedure* (ECPP03) continued to be up-to-date and did not require any modifications.
5. *Review of OPEX's Purchase Order Terms:* The OPEX Legal Department reviewed and confirmed that OPEX's existing online purchase terms and conditions at <https://www.opex.com/about-us/supplier-terms-and-conditions/> continued to be up to date regarding its terms and conditions prohibiting suppliers from using or benefiting from forced labour.
6. *Review of OPEX's Supplier Code of Conduct and Ethics:* The OPEX Legal Department reviewed and confirmed that OPEX's existing *Supplier Code of Conduct and Ethics* continued to be up-to-date regarding its policies prohibiting suppliers from using or benefiting from forced labour.

7. *Review of OPEX's Supplier Questionnaire:* The OPEX Purchasing organization confirmed that the organization's supplier questionnaire continued to contain the following forced labour-related questions/certification:

- Are your materials/products/services sourced, processed, and manufactured in compliance with all applicable local, state/provisional, federal/national, and international laws and conventions prohibiting the use of forced labour, slave labour, human trafficking, and child labour?
- Do you have a forced labour policy and/or statement? If so, please attach it to this questionnaire.
- My company hereby certifies that its products, as well as all materials and components comprising its products, are sourced, processed, and manufactured in compliance with all applicable local, state/provisional, federal/national, and international laws and conventions prohibiting the use of forced labour, slave labour, human trafficking, and child labour.

8. *OPEX's Whistleblowing Platform:* OPEX renewed the subscription for its whistleblowing platform in its direct markets outside the U.S. and Canada, through which OPEX employees can report actual or suspected breaches of regulations, including forced labour violations by suppliers, etc.

ATTESTATION


Per the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act")*, and in particular section 11 thereof, I, the undersigned John G. Sullivan, in my capacity as International Counsel of OPEX Corporation, attest that I have reviewed the information contained in this report on behalf of the governing body of OPEX Corporation. Based on his 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.

Full name: John Sullivan

Title: International Counsel, OPEX Corporation

Date: 02 / 01 / 2025

Signature: 

My Initials Hereby Serve As My Representation That I Have the Authority To Bind the Entity: 

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