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

Report Required By May 31, 2026
Covering Fiscal Year: October 1, 2024 through September 30, 2025

OPEX Corporation ("OPEX Corporation" or "OPEX"), as a manufacturer of goods produced outside Canada and *sold in Canada*, is submitting this report in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). (This report will also be made available on opex.com in accordance with the requirements of the Act.)

STRUCTURE AND ACTIVITIES

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

For nearly fifty years, OPEX has manufactured its equipment (currently, document and mail automation equipment and warehouse automation) exclusively in the United States and today employs several hundred employees at its manufacturing facilities in Moorestown and Pennsauken, New Jersey and Plano, Texas. Given that OPEX assembles its products entirely within the United States, OPEX's manufacturing operations are subject to U.S. federal, state, and local laws, including applicable labour laws.

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

Regarding Canada, OPEX exports OPEX-branded equipment from the U.S. to Canadian commercial and governmental customers. OPEX does not maintain any offices in Canada, but the Company does employ a small handful of Canadian field service technicians who install, commission, maintain, and repair OPEX equipment sold to Canadian customers.

OPEX, at its U.S. manufacturing facilities, manufactures a large proportion of the parts (i.e., metal parts) used in OPEX equipment. As a result, OPEX is able to ensure -- directly and on a first-hand basis -- that forced labour[1] is not used in its manufacture of such parts. Moreover, a large proportion of the raw materials that OPEX uses in the manufacture of its equipment come 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 laws.

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

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

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POLICIES AND DUE DILIGENCE

OVERVIEW: OPEX strives to make ethical business choices when it comes to preventing forced labour, and the Company does 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. The cornerstone of that program is 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: Below are some of the steps that OPEX takes to ensure the Company's compliance with anti-forced labour laws:

Supply Chain Verification: OPEX's suppliers are expected to comply with applicable national/federal, state/provincial, and other relevant forced labour laws. OPEX's *Supplier Code of Conduct and Ethics* expressly requires such compliance. If OPEX is informed or otherwise becomes aware of a forced labour concern involving a supplier, OPEX reserves the right to request that the supplier remediate the concern, or the supplier will face the prospect of suspension or termination of its supply arrangement.

Supplier Audits: OPEX sends its suppliers questionnaires to assess the suppliers' compliance with applicable forced labour requirements. Moreover, on a periodic basis, OPEX reviews the online forced labour statements and/or other publicly available forced labour information of a select list of our suppliers to gauge their forced labour prevention efforts. If such an online statement or other publicly available information is unavailable for such a supplier, OPEX may question the supplier further. OPEX's selection of suppliers for such audits is based on the criteria outlined in our forced labour risk assessment described below.

Supplier Certifications: OPEX manufactures a large proportion of the parts (i.e., metal parts) that go into our products. Regardless of whether OPEX sources other materials or parts from U.S. or non-U.S. suppliers, the Company expects suppliers to abide by applicable national/federal, state/provincial, and other relevant laws prohibiting the suppliers' use of forced labour in the provision of its supplies. OPEX asks suppliers, as part of the above-mentioned supplier questionnaires, to certify that their materials and parts will comply with such laws.

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Supplier Accountability Programs: OPEX strives to develop and maintain 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 acts or conditions that do not comply with those principles or applicable law, including but not limited to violations of forced labour laws, we reserve the right to seek remediation and/or other appropriate actions.

Employee Training: All OPEX employees must comply with our corporate policies, employee manuals, and other requirements. Such documentation includes provisions addressing legally permissible and impermissible labour practices. We also post at our U.S. facilities – and at various of our non-U.S. facilities -- posters and/or other statements regarding the payment of proper wages and/or other topics that may bear upon forced labour compliance.

ADDITIONAL DETAILS: More specifically, OPEX has, within the past year, undertaken the steps below aimed at combating the use of forced labour in our operations and supply chain, with a view toward achieving continually improving compliance:

1. Review of Prior-Year Findings

OPEX compliance personnel reviewed the Company's internal FY2024–2025 forced labour audit findings to ensure that any required follow-up actions are incorporated into supplier oversight practices. These actions inform enhancements to supplier monitoring and compliance processes.

2. Development of Forced Labour Risk Assessment (RA020)

On 25 July 2025, OPEX implemented its Global Risk Assessment 020 (RA020) – Modern Slavery. RA020 represented OPEX's first fully developed, cross-functional risk-based framework for identifying, evaluating, and mitigating forced labour risks across its operations and supply chain.

RA020's framework includes defined risk criteria (geographic, supplier-type, and industry-specific), a structured likelihood/severity risk-scoring matrix, pre-control and post-control risk evaluations, country-specific supplier mapping through Attachments B and C, and identification of moderate- to high-risk jurisdictions relevant to OPEX's supply chain, including China, India, Malaysia, Indonesia, Mexico, Sri Lanka, and South Africa.

RA020 forms the basis for identifying higher-risk suppliers for OPEX's forced labour audits.

3. Forced Labor Training Completion

In July 2025, certain key OPEX Legal Department and Purchasing Department personnel completed OpenLearn's Modern Slavery course (Course Code W102_1). All participants passed the required assessment.

Going forward, one of OPEX's key objectives will be to ensure that such key OPEX purchasing personnel participate in additional, practical, forced labour training relevant to their roles.

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4. Surveying OPEX Purchasing Team Members

On December 9, 2025, the OPEX Purchasing Department re-issued its annual forced labour verification questions to all members of the purchasing team. The questions asked such personnel whether they became aware during the prior one-year period of (i) any OPEX supplier engaging in forced labour, or (ii) any sourcing involving suppliers located in, or using labour from, the Xinjiang Uyghur Autonomous Region of the People's Republic of China, potentially implicating the U.S. Uyghur Forced Labor Prevention Act. No adverse responses were received.

5. Reissuance of OPEX's Forced Labor Board Resolution (UK)

In October 2025, OPEX's board of directors issued their annual resolution confirming OPEX's compliance with Section 54 of the UK Modern Slavery Act for FY2024–2025. That annual board action enabled OPEX to re-publish on opex.com the Company's annual *UK Modern Slavery and Human Trafficking Statement* and reinforced executive management's continuing support for OPEX's statutory forced labour obligations.

6. Review of OPEX's Forced Labor Policy

In December 2025, the OPEX Legal Department completed its periodic review of the Company's Global *Modern Slavery Policy & Procedure*, resulting in substantive, administrative, and formatting updates to the policy. The policy continues to address the requirements of applicable Canadian law, the California Transparency in Supply Chains Act, the UK Modern Slavery Act, and various other relevant forced labour laws.

7. Review of OPEX's Purchase Order Terms

In December 2025, the OPEX Legal Department reviewed and confirmed that the provisions relating to forced labour compliance in the Company's online *Purchase Order Terms and Conditions* and remained accurate and sufficient. Section 9 ("Compliance") of those terms continues to require suppliers to comply with all applicable laws prohibiting forced labour.

8. Review of OPEX's Supplier Code of Conduct and Ethics

In December 2025, the OPEX Legal Department reviewed the Company's *Supplier Code of Conduct and Ethics* and confirmed that no amendments to the code were needed. The code continues to prohibit forced labour and, among other things, requires compliance with applicable wage-and-hour, benefits, working-hours, overtime, and leave laws.

9. Review of OPEX's Supplier Questionnaire Template

On December 10, 2025, the OPEX Purchasing Department confirmed that its supplier questionnaire template continued to include forced labour-related questions addressing legal compliance, the existence of supplier forced labour policies, and supplier certification of compliance.

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10. OPEX's Whistleblowing Platform

In December 2025, OPEX renewed its SaaS subscription to its whistleblowing platform for markets outside North America. That platform enables OPEX employees outside North America to report actual or suspected legal violations, including any forced labour violations. No forced labour-related reports were received through the whistleblowing platform during FY2024–2025.

11. Withhold Release Orders (WROs)

On December 9, 2025, the OPEX Purchasing Department confirmed that none of its suppliers, with respect to FY2024–2025, were found to be subject to U.S. Customs and Border Protection Withhold Release Orders or Findings. Moreover, the OPEX Purchasing Department confirmed that, with respect to the same, no OPEX shipments were found to have been detained or questioned due to suspected forced labour, and no brokers, freight forwarders, or importers of record reported forced labour-related customs actions involving OPEX suppliers.

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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 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.

Full name: John Sullivan

Title: International Counsel, OPEX Corporation

Date: 16 / 02 / 2026

Signature: 

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

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