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Child and Forced Labor Compliance Report, Bill S-211, fiscal year ending March 31st, 2025.

Wells Vehicle Electronics (Business Number: 851443127RM0001) is pleased to submit this comprehensive report, which outlines our dedicated efforts and ongoing commitment to prevent forced and child labor from entering our supply chain. We acknowledge the profound global implications of these practices and their detrimental effects on fundamental human rights. Our adherence to ethical business conduct is not solely a matter of regulatory compliance, but a fundamental principle that defines our organizational values and guides our operations.

We believe that true innovation lies not only in the products we create but also in the solutions we devise to ensure the well-being and fair treatment of all our associates and business partners. Guided by our mission to foster mutually beneficial innovation, we are committed to protecting human rights across our supply chain and building equitable partnerships.

In alignment with our vision to be a dominant global solution provider with a broad selection of trusted products and world-class customer service, we have implemented comprehensive measures to identify, assess, and mitigate the risk of forced and child labor. By embracing transparency, accountability, and collaboration, we aim to set a standard for responsible business conduct that exceeds mere compliance with regulations.

Our commitment to eradicating forced labor is not just a corporate obligation but a moral imperative that we embrace wholeheartedly. As you delve into the pages of this report, we invite you to join us on this journey of continuous improvement and ethical leadership. Together, we can create a supply chain ecosystem that stands as a beacon of fairness, dignity, and respect for all. Thank you for your interest in our commitment to preventing forced labor, and we look forward to your engagement and support in this critical endeavor.

For more than 120 years, Wells has specialized in premium vehicle and engine management electronics for industry-leading OEMs and motor-vehicle brands.

Today, Wells is more than a premier global manufacturer of vehicle electronics; it is also one of the most respected brands in the motor vehicle aftermarket, tens of thousands of precision engineered components are available through an extensive network of replacement parts distributors or retail locations.

MISSION

Create innovative win-win solutions for all our associates and business partners in vehicle electronics.

VISION

Be a dominant global solution provider with a broad selection of trusted products and world-class customer service.

VALUES

Integrity
Initiative
Unity
Perseverance

Wells initiated a supplier program aimed at cultivating an environment of ongoing enhancement and mutual respect among our employees and suppliers. Central to the success of this initiative was the imperative to enlist and retain suppliers who resonate with our core values and commitments.

The completion of Wells' Supplier Assessment Survey, coupled with the capacity for on-site assessment and audits of suppliers' facilities, is instrumental in determining viable supplier engagement.

As an approved supplier of Wells, as it pertains to Forced and Child Labor, they must acknowledge and comply with the Wells Vehicle Electronics Statement on Child and Forced Labor. This document constitutes a mandatory requirement for all production suppliers—both foreign and domestic, as well as full-time and part-time partners. This acknowledgement is systematically maintained within our corporate records and is subject to ongoing review through our Supplier Assessment Surveys.

The Wells Vehicle Electronics Statement on Child and Forced Labor is not simply a vendor statement to acknowledge. It provides a full understanding of our values and expectations with an educational insight into definitions on Forced Labor and Child Labor. The vendors supply chain requirement to ensure they are also managing their partners as it relates to Forced Labor and Child Labor. As the vendor completes the statement, they must provide not only a signature with the certification statement but also an initial on each page to ensure its acknowledgment.

Wells, prior to 2023 also incorporated within our General Terms & Conditions of Purchase a disclosure statement pursuant to California Transparency in Supply Chains Act.

Wells Vehicle Electronics supports the right of all individuals to be free from slavery in the workplace. Wells Vehicle Electronics abhors the practice of human trafficking and slavery and applauds efforts being made globally to eliminate this practice. Wells Vehicle Electronics includes in its contracts with suppliers a requirement that they comply with all laws applicable to the business being transacted.

By signing a purchase order or contract, the supplier certifies that it conducts business pursuant to laws related including, but not limited to, laws that prohibit slavery and

human trafficking. A supplier's failure to honor its independent legal and contractual commitment to Wells Vehicle Electronics is a violation of law and breach of the contract. Wells Vehicle Electronics sources its raw materials and other inputs with reputable companies with high standards. As such, Wells Vehicle Electronics does not believe that additional verification or independent audit is necessary to continue to deliver our customers a quality product manufactured with integrity.

In addition to supplier programs, Wells has implemented a Whistleblower System to ensure compliance with legal, social, and internal policies, fostering a positive and transparent company culture. This tool allows internal parties to report harmful behaviors or risks to the company.

We treat our clients, business partners and employees with respect and maintain constructive business relationships. Violations of our principles, such as breaches of health and safety, data misuse, harassment, or violation of national or international laws, as well as violations of internal guidelines are not tolerated.

"By reporting damaging behavior through this provided whistle blowing system, you are contributing to the protection of our shared values."

The system ensures that each report about violations or breaches of standards and values is secure and anonymous. All data and information submitted, especially the identity of the whistleblower, will be treated with strict confidence and is protected by the system.

Through the utilization of this system, we uphold our responsibilities and reinforce our credibility with customers, business partners, and employees. Our commitment is demonstrated by strict adherence to our principles, as well as the applicable regulations and legislation.

Our Fond du Lac headquarters is home to our corporate offices and primary production facility where we engineer top-quality products using leading-edge manufacturing technologies. Shipments from this location support the automotive industry in North America, South America, Europe, Asia, and Australia.

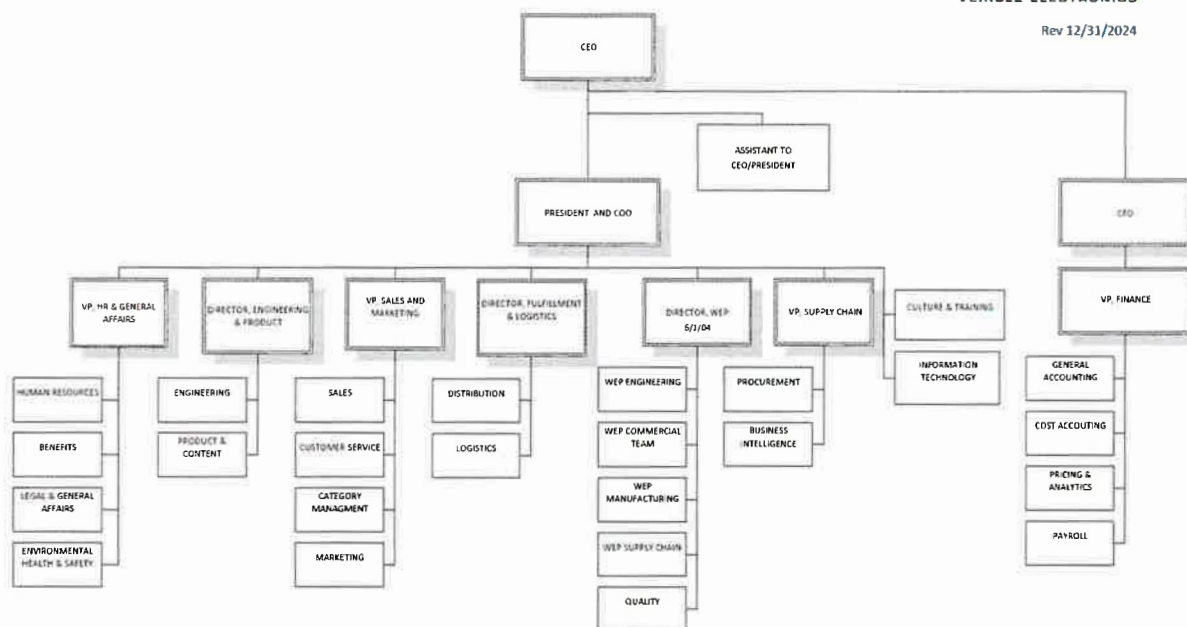
Procurement involves the process of acquiring goods, services, or works from an external source. It encompasses activities such as identifying needs, sourcing suppliers, negotiating contracts, purchasing, and managing supplier relationships. Choosing the right suppliers is critical for the success of the supply chain. The selection of suppliers is guided by a comprehensive evaluation of factors including quality, cost, reliability, geographic location, and ethical consideration.

Our supply chain management/procurement is integral to our operations. We aim to build long-term relationships with suppliers worldwide, strengthening our supplier initiatives at every business level.

Functional Organization



Rev 12/31/2024



Wells manages every stage of production, from sourcing materials to final delivery, ensuring a seamless and efficient process. In collaboration with its global subsidiaries, affiliates, and partners, Wells prohibits the use of child or forced labor at all levels of operations, including with any factories or subcontractors involved in production. Our procurement and supply chain practices ensure that we do not engage with any suppliers or entities that knowingly utilize forced or involuntary labor.

We have three owned and two leased and operated facilities in the United States: Centerville, IA: 186 employees (owned); Fond du Lac, WI: 215 employees (owned/leased); and Mission, TX: 8 employees (leased). Since our last report, our Reynosa, MX location and business was sold, we have closed our McAllen, TX location and opened our Mission, TX location.

In alignment with our commitment to upholding strong business ethics, we have instituted a robust training program that incorporates diverse learning methods. This program is designed around content specifically tailored to our organization's policies, procedures, and workflows.

With a user-friendly Learning Management System (LMS) we have simplified the learning experience. The LMS maintains an expansive library that holds over 36,000 courses on a variety of specialized subjects. The LMS provides notifications to all our associates of assigned training and learning that will track and maintain electronic records once completed.

In 2023 the business was awarded the Silver Medal, which is presented to the top 25% of all companies evaluated by Eco Vadis. Eco Vadis is an international

assessment organization. Specifically, the evaluation is based on a company's policies, measures, and performance in four areas: Environmental, Labor and Human Rights, Ethics and Sustainable Procurement.

To show that Wells is not only concerned about the big picture, we also actively support our local communities throughout the year. Our engagement spans a wide range of charitable, educational, and community-focused efforts in both Fond du Lac, WI and Centerville, IA.

Employees contribute to the United Way and collect personal hygiene items, food, and clothing for the Holy Family Warming Shelter in Fond du Lac. We sponsor Walleye Weekend, with employees volunteering for the Walk/Run races, and support the Fond du Lac County Fair and Demolition Derby. Through Back to School FDL, employees donate and help distribute school supplies to local children. We also sponsor and volunteer at The Ledge Games, which raises scholarship funds for students entering engineering, manufacturing, and technology fields.

Throughout the year, we support several meaningful causes and events, including Old Glory Honor Flight, Salute the Troops, Caring for You Cancer Fundraiser, and Toys for Tots, where employees donate new toys to local children.

In Centerville, our community efforts include supporting Pancake Day, the Appanoose County Fair, BBQ & Brew, BBQ & Beards, Relay for Life, Forever Friends Animal Shelter, the Sports Booster Club, Drama and Band Club, the Fire Department, Centerville Rotary Club, and Friends of the Centerville Library.

- These efforts, large and small, reflect our ongoing commitment to making a positive difference in the places where we live and work.

At Wells Vehicle Electronics, we remain steadfast in our commitment to ethical sourcing and supply chain integrity. Through rigorous monitoring, supplier engagement, and continuous improvement initiatives, we have implemented robust measures to prevent the scourge of forced labor from infiltrating our supply chain. As detailed in this report, our efforts encompass comprehensive supplier vetting processes, ongoing audits, and partnerships with credible third-party organizations to ensure compliance with internationally recognized labor standards.

Aligned with our mission to create innovative, win-win solutions for all our associates and business partners in vehicle electronics, we strive to lead as a dominant global provider, offering a broad selection of trusted products complemented by world-class customer service. This vision empowers us to elevate our operational and ethical standards continually.

Furthermore, we recognize the importance of transparency and accountability, which is why we are dedicated to openly sharing our progress and challenges in combating forced labor. While we are proud of the strides we have made, we acknowledge that

eradicating forced labor requires sustained vigilance and collaboration across industries and borders. We remain committed to this cause and will continue to work tirelessly to uphold the dignity and rights of all workers throughout our supply chain, ensuring that our practices reflect our values and contribute positively to the global community.


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 of the entity or entities listed above. Based on my knowledge, 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 report year listed above.

Full Name: Patrick J. Sommerfeld

Title: President and Chief Operations Officer

Date: 5/21/2025

Signature:



"I have the authority to bind Wells Vehicle Electronics."