

# CESPIRA

## 2024 FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS REPORT

### Introduction

#### About

This 2024 Fighting Against Forced Labour and Child Labour in Supply Chains Report (“**Report**”) is made on behalf of HPDI Technology Limited Partnership (“**HPDI LP**”) by its general partner, 1463861 B.C. Ltd. (“**1463861**”). HPDI LP and 1463861 are collectively referred to in this document as “**Cespira**” or the “**Company**”.

This Report outlines the governance processes, measures and progress made by Cespira during the financial reporting period from the formation of HPDI LP on February 2, 2024 to December 31, 2024 (the “**Reporting Period**”) pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). It sets out the steps taken during the Reporting Period to prevent and reduce the risk that forced or child labour is used at any step of the production of goods or elsewhere by Cespira or of goods imported into Canada by the Company.

Our Report demonstrates Cespira’s commitment to integrity and to ensuring that the way we do business has a positive impact on our people, the environment, and the communities in which we work and live.

#### Steps Taken

In general terms, Cespira or its affiliates took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- began the process of mapping our supply chains;
- adopted a Code of Conduct, Human Rights Policy and Whistleblower Policy; and
- facilitated training for our employees on the requirements of our Code of Conduct.

Details of the above actions are set out in this Report.

### Structure, Activities and Supply Chains

#### Structure

HPDI LP is a limited partnership formed under the *Partnership Act* (British Columbia). 1463861 is a corporation incorporated under the *Business Corporations Act* (British Columbia) and is the general partner of HPDI LP. Together, the entities do business under the name ‘Cespira’. The affairs of Cespira are administered, managed, and operated by the general partner, 1463861.

Born from a joint venture between the Volvo Group and Westport Fuel Systems, Cespira began operations on June 3, 2024. The Company is majority-owned by Westport Fuel Systems Canada Inc., a corporation incorporated under the *Business Corporations Act* (British Columbia), which is in turn wholly-owned by Westport Fuel Systems Inc., a corporation incorporated under the *Business Corporations Act* (Alberta) whose shares are listed on the Toronto Stock Exchange and Nasdaq. Refer to Westport’s separately-filed Fighting Against Forced Labour and Child Labour in Supply Chains report for information about Westport and its operations and supply chains.

## **Activities**

Our head office, principal place of business and registered office are located in Vancouver, British Columbia, Canada.

The Company is a leading organization for the engineering, manufacturing and supply of alternative fuel systems and components for transportation applications. It is the proud home of the cutting-edge high-pressure direct injection (“**HPDI™**”) technology. Cespira’s HPDI™ fuel system is a revolutionary fuel system that enables existing internal combustion engine architecture to operate with a variety of alternative fuels, including natural gas, renewable natural gas or bio-methane, syngas and hydrogen.

With HPDI™ as the driver, the Company is committed to advancing the development and global accessibility of the HPDI™ fuel system technology, particularly in heavy duty long-haul trucking, which demands a mix of solutions to achieve meaningful decarbonization results on a global scale.

As of December 31, 2024, our workforce at Cespira was approximately 48 individuals, which includes direct employees and individuals contracted directly for twelve months or longer. Approximately 47 individuals are in Canada and one is outside Canada.

## **Supply Chains**

We do business with a number of suppliers who source materials and services locally and globally. We strive to work with direct suppliers who operate legally, ethically, and responsibly. During the Reporting Period, we procured goods and services across a wide range of categories and industry sectors including the following key goods and services: research and development services, research and development machinery and equipment and information technology services.

Cespira began the process of mapping its supply chains during the Reporting Period and is still in the beginning stages of this process.

## **Policies, Governance and Due Diligence Processes**

Our corporate governance framework includes a number of policies and practices which relate to or affirm our commitment to embedding responsible business conduct and ensuring the highest possible standards of ethical, moral and legal business conduct in our operations and management systems. A number of our key policies can be found on the Company website at: <https://cespira.com/supplier-portal/home/>. In addition, we have a third-party screening tool to support our corporate governance framework.

## **Code of Conduct**

During the Reporting Period, we adopted a Code of Conduct that is applicable to Cespira and our subsidiaries and affiliates. Our expectations for individual integrity and ethical, moral, and legal conduct are outlined in the Code of Conduct, which applies to everyone within the organization, including directors, officers, employees and contractors. In addition, all agents and suppliers are expected to following the spirit of the Code when working on behalf of the Company.

The Code of Conduct is designed to ensure such individuals, and the Company generally: (i) comply with applicable laws, regulations and Company policies; (ii) promote integrity and the highest standard of ethical conduct; and (iii) avoid even the appearance of anything improper in connection with our business activities. The Code of Conduct enshrines our commitment to respecting internationally recognized labour standards and opposing all forms of forced labour, human trafficking, and child labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any human trafficking.

## ***Human Rights Policy***

The Human Rights Policy sets out the Company's commitment to ensuring that people are treated with dignity and respect throughout its operations and to working with all of its employees as well as its suppliers, contractors and subcontractors at any tier, business partners, external stakeholders or persons in its value chain ("**Partners**") to ensure that this commitment is met. The Human Rights Policy addresses international human rights, labour rights, child labour, the rights of Indigenous Peoples and the right to a healthy and sustainable environment. It also explicitly prohibits the use of all forms of forced labour and human trafficking in the production of our products or services, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any human trafficking. Likewise, Cespira does not use child labour and is committed to not establishing or maintaining working relationships with Partners that use child labour.

## ***Whistleblower Policy***

An anonymous ethics hotline is made available as an avenue for employees to raise concerns about corporate conduct. Our Whistleblower Policy establishes standards and procedures that allow employees to report concerns or complaints about corporate conduct (so-called "whistleblowing") with the reassurance that they will be protected from retaliation, reprisals or victimization for all such reporting or whistleblowing. The scope of reportable matters is intended to be broad and comprehensive and to include any matter which, in the view of the person expressing the concern or complaint, is illegal, unethical, contrary to the Code of Conduct or policies of the Company or in some other manner not right or proper. The Whistleblower Policy provides stakeholders with the opportunity to call or submit via an online platform (managed by a third-party service provider) any complaint, report, whistleblowing, etc. Reports issued via this mechanism are received by our General Counsel and the chair of the board of directors (or to the full board of directors, if escalated) who may receive assistance and direction from external legal counsel or others, as appropriate.

## **Risk and Steps Taken to Assess and Manage the Risk**

As described above, in 2024 we started the process of mapping our supply chains and implementing governance policies and procedures. This work remains ongoing in 2025. As Cespira only began operations in June 2024, we have not yet started the process of identifying the parts of our supply chain that carry risks of forced labour or child labour being used.

In terms of our own activities, we employ a highly educated and experienced team of professionals focused on the development and commercialization of a portfolio of products and technologies. Our workforce is mainly comprised of engineers, skilled workers and office staff in the Province of British Columbia who are employed on a permanent basis. None of our workers are under the age of 18. In addition, all staff are hired in accordance with standard policies and everyone has a written contract. Therefore, we consider that there is a low risk of modern slavery risks in our direct operations.

Based on the process conducted in 2024, we did not identify forced labour or child labour in our activities or supply chains.

## **Remediation**

Through reporting mechanisms, we are committed to providing access to remedies. Our Whistleblower Policy allows for concerns to be reported confidentially and without fear of reprisal. During the Reporting Period, no incidents of forced labour or child labour were identified, and no incidents of forced labour or child labour were reported pursuant to the Whistleblower Policy. As a result, we have not had to take any measures to remediate any forced labour or child labour or to remediate any corresponding loss of income for vulnerable families.

## **Training**

Each employee is required to execute confidentiality and proprietary rights agreements and must certify to having read, understood, and agree to abide by our Code of Conduct. Online training was also conducted during the Reporting Period to ensure that our workforce is empowered to do the right thing, for the right reason, and in the right way.

In 2024, we implemented an online module titled “Human Trafficking & Modern Slavery” which is included within new employee and employee annual online code of conduct/ethics mandatory training issued via a third-party service provider.

## **Effectiveness**

During the Reporting Period, the Company introduced a number of policies and procedures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. As the Company is in the early stages of implementing these policies and procedures, it has not yet begun to formally assess their effectiveness. The Company intends to continue to evaluate our reporting processes to ensure that our reporting complies with the requirements set out in the Act. The Company will also continue to review opportunities to enhance and improve our current policies and practices.

## **Attestation**

This Report was approved on May 8, 2025 pursuant to subparagraph 11(4)(a) of the Act by the board of directors of 1463861 in its capacity as general partner of HPDI LP.

I make this attestation in my capacity as a director of 1463861 for and on behalf of the board of directors of 1463861.



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Name: Daniel Sceli

Title: Director