

Child and Forced Labor Compliance Report, Bill S-211, fiscal year ending March 31st, 2026.

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 recognize the serious global impact of forced and child labor and remain committed to upholding fundamental human rights throughout our operations and supply chain. Ethical business practices are more than a compliance requirement; they are a core part of our values and the way we conduct business.

We believe innovation extends beyond the products we develop to include the responsible and equitable partnerships we build with our associates, suppliers, and customers. Guided by this commitment, we actively work to identify, assess, and reduce risks related to forced and child labor across our supply chain.

Through transparency, accountability, and collaboration, we strive to maintain high standards of responsible business conduct and deliver trusted products with integrity.

Wells is committed to eliminating forced labor throughout our operations and supply chain. This commitment reflects not only our corporate responsibilities, but also our core values and dedication to ethical business practices. We view this as an ongoing effort and remain focused on continuous improvement, transparency, and responsible leadership. By working collaboratively with our partners and stakeholders, we strive to promote fairness, dignity, and respect across our supply chain. We appreciate your interest and support in this important initiative.

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

Wells is recognized not only as a global manufacturer of vehicle electronics, but also as a trusted name in the automotive aftermarket. Tens of thousands of precision-engineered components are available through an extensive network of distributors and retail locations worldwide.

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 has implemented a supplier program focused on continuous improvement, accountability, and strong partnerships with our suppliers. A key objective of this program is to engage and retain suppliers that align with our values, ethical standards, and commitment to responsible business practices.

Supplier participation includes completion of the Wells Supplier Assessment Survey, as well as the potential for on-site assessments and audits when necessary. These measures help evaluate supplier compliance and support informed sourcing decisions.

As part of the approval process, all Wells' suppliers domestically and internationally, including both full-time and part-time production partners must acknowledge and comply with the Wells Vehicle Electronics Statement on Child and Forced Labor. Supplier acknowledgements are maintained within our corporate records and are reviewed regularly through ongoing supplier assessments and compliance activities.

The Wells Vehicle Electronics Statement on Child and Forced Labor serves as more than a standard supplier acknowledgment. It outlines our values, expectations, and commitment to ethical sourcing while also providing guidance and definitions related to forced labor and child labor practices.

The statement reinforces supplier responsibility not only within their own operations, but throughout their supply chain, ensuring appropriate oversight of their business partners as it relates to forced and child labor compliance.

To confirm understanding and acceptance of these requirements, suppliers must complete the certification with an authorized signature and initial each page of the document as 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 its supplier compliance programs, Wells has implemented a Whistleblower System designed to support compliance with legal requirements, ethical standards, and internal company policies. This program promotes transparency, accountability, and a positive workplace culture by providing employees and other internal stakeholders with a confidential method to report concerns, misconduct, or potential risks to the organization.

Wells is committed to treating employees, customers, and business partners with professionalism and respect while maintaining strong and constructive business relationships. Violations of company policies or legal standards—including issues related to health and safety, data privacy, harassment, unethical conduct, or noncompliance with applicable laws and internal guidelines—are taken seriously and 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 is designed to provide a secure and anonymous method for reporting concerns, violations, or breaches of company standards and values. All information submitted, including the identity of the reporting individual, is handled with strict confidentiality and protected through established reporting safeguards.

By maintaining this system, Wells reinforces its commitment to ethical business practices, accountability, and compliance with applicable laws and regulations. This commitment helps strengthen trust with employees, customers, and business partners while supporting a culture of integrity and transparency.

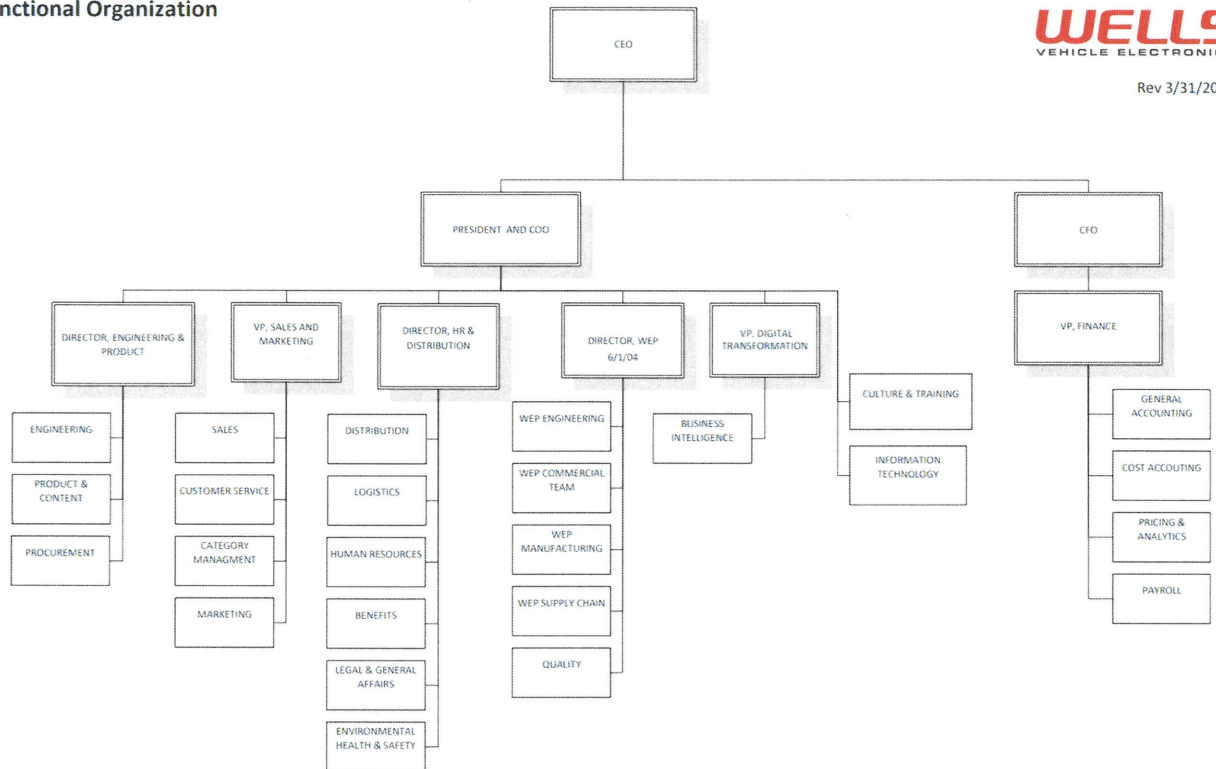
Wells' headquarters in Fond du Lac serves as both the corporate office and primary production facility, where high-quality products are developed using advanced manufacturing technologies. Shipments from this location support customers across North America, South America, Europe, Asia, and Australia.

Procurement involves the sourcing and acquisition of goods, services, and materials from external suppliers. This process includes identifying business needs, evaluating

suppliers, negotiating agreements, purchasing materials, and managing supplier relationships. Supplier selection is based on a range of factors, including quality, cost, reliability, geographic considerations, and alignment with our ethical and compliance standards.

Supply chain management and procurement are essential components of Wells' operations. We are committed to building strong, long-term partnerships with suppliers around the world while continuously strengthening our supplier programs and responsible sourcing initiatives across all areas of the business.

Functional Organization



Wells oversees each stage of the production process, from material sourcing through final delivery, to support efficient operations and consistent quality standards. In partnership with its global subsidiaries, affiliates, and suppliers, Wells maintains a strict commitment to prohibiting the use of child labor and forced labor throughout all levels of its operations, including within factories, subcontractors, and supplier networks.

Our procurement and supply chain practices are designed to promote responsible sourcing and ensure that Wells does not knowingly conduct business with suppliers or organizations that engage in forced, involuntary, or child labor practices.

We have two owned and two leased and operated facilities in the United States: Centerville, IA: 140 employees (owned); Fond du Lac, WI: 180 employees (1 owned and 1 leased); and Mission, TX: 3 employees (leased).

In support of our commitment to strong business ethics and compliance, Wells has implemented a comprehensive training program that utilizes a variety of learning methods. The program is designed to align with our organizational policies, procedures, and operational practices.

To support employee development and training accessibility, Wells utilizes a user-friendly Learning Management System (LMS) that provides access to an extensive library of more than 36,000 courses across a wide range of specialized topics. The LMS also manages training assignments, sends automated notifications to associates, and maintains electronic records of completed training to support ongoing compliance and development initiatives.

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 financially and collect personal hygiene items, food, and clothing for the Holy Family Warming Shelter in Fond du Lac. Wells sponsors Walleye Weekend, with employees volunteering for the Walk/Run races. 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. Wells also sponsors and mentors, the Fond du Lac High School robotics team and the Cheerleading team, and participated in the FDL Optimist club, Envision Leadership, supported the local Humane Society.

Throughout the year, we support several meaningful causes and events, including Old Glory Honor Flight, Salute the Troops, Welcome Home Soldier, Caring for Your Cancer Fundraiser, and Christmas Crusade, 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. Wells also contributed

to the local schools with After Prom support, Sports Booster Club, Drama and Band as well as the Appanoose County baseball team.

These ongoing efforts reflect Wells' commitment to strengthening the communities where we operate and creating a positive impact through volunteerism, partnerships, and community engagement.

At Wells Vehicle Electronics, we remain committed to ethical sourcing, responsible business practices, and maintaining integrity throughout our supply chain. Through supplier engagement, ongoing monitoring, and continuous improvement initiatives, we have established processes designed to identify, assess, and reduce the risk of forced labor within our operations and supplier network. These efforts include supplier evaluations, periodic audits, and collaboration with reputable third-party organizations to support compliance with internationally recognized labor standards.

Consistent with our mission to deliver innovative and mutually beneficial solutions for our associates, customers, and business partners, Wells continues to strengthen its position as a global provider of trusted vehicle electronics products supported by high-quality customer service. This commitment drives our ongoing focus on operational excellence, accountability, and ethical business conduct.

We recognize the importance of transparency and accountability in maintaining responsible and ethical supply chain practices. For that reason, Wells is committed to openly communicating both our progress and ongoing efforts related to the prevention of forced labor. While we are encouraged by the measures implemented to date, we understand that addressing forced labor risks requires continued diligence, collaboration, and ongoing improvement across industries and global supply chains.

Wells remains committed to upholding the dignity, rights, and fair treatment of workers throughout our operations and supplier network. We will continue working to strengthen our processes and ensure our business practices align with our values and support responsible global commerce.

In accordance with the requirements of the Act, including Section 11, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge and having exercised reasonable diligence, I confirm that the information presented in this report is true, accurate, and complete in all material respects for the reporting year identified above.

Full Name: Carie Sommerfeld

Title: Vice President of Finance

Date: 5/27/2025

Signature: 

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