

Supply Chains Act Report

Fiscal Year 2024



## About this Report

Anthony, Inc. & Hill Phoenix, Inc. ("Dover Food Retail", "we", "our" or "us") has prepared this report (the "Report") being submitted pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ended December 31, 2024 (the "Reporting Period").

This Report describes the steps taken to enhance transparency in our supply chains by outlining the steps taken during the 2024 financial year to prevent and reduce the risk that forced labour or child labour ("Modern Slavery") is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

Dover Food Retail does not report under similar legislation in any other jurisdiction. The most recent statement under the *California Transparency in Supply Chains Act* can be found [https://www.anthonymintl.com/docs/default-source/2022-documents/transparency-in-supply-chains-disclosure-2021-anthony.pdf?sfvrsn=7ff9d78d\\_2](https://www.anthonymintl.com/docs/default-source/2022-documents/transparency-in-supply-chains-disclosure-2021-anthony.pdf?sfvrsn=7ff9d78d_2).

## Introduction

We are firmly committed to responsible sourcing throughout our supply chain. We believe that our customers care not only about the value of our products, but also about how those products are produced. To that end, we view addressing human rights and other critical issues in our supply chain as both a business imperative and a sustainability priority, and have established standards for our suppliers to follow when conducting business with us and to help us identify and manage potential risks.

## Structure, Activity, and Supply Chain

Anthony, Inc. and Hill Phoenix, Inc. are both an indirect wholly owned subsidiary of Dover Corporation ("Dover"). Both Anthony, Inc. and Hill Phoenix, Inc. are corporations organized under the laws of Delaware and are headquartered in Sylmar, California & Atlanta, Georgia respectively.

Dover is a diversified global manufacturer that delivers innovative equipment and components, consumable supplies, aftermarket parts, software and digital solutions and support services.

Dover Food Retail manufactures commercial and industrial refrigeration systems, refrigerated display cases and specialty products along with glass and freezer doors and lighting systems.

Dover Food Retail sources goods and services used in making our products globally. In 2024, Dover Food Retail purchased a majority (approximately 85%) of material supplies from our affiliate in the North America.

### Policies and Due Diligence

Dover takes a global, company-wide approach to its modern slavery compliance, which includes Dover Food Retail . Dover does not tolerate any form of modern slavery, human trafficking, forced or involuntary labour and child labour.

The compliance program is led by Dover's Chief Compliance Officer and a dedicated team of compliance professionals around the world, both at the corporate and operating company level, including Dover Food Retail. This team of compliance professionals is supplemented by the Compliance Champion Program, a network of compliance-trained points of contact at facilities around the world, which extends compliance knowledge and focus throughout the organization.

The policies and procedures discussed in this report, including the Dover Code of Conduct (the “Code”) and the Supplier Code of Conduct (the “Supplier Code”), apply to all direct and indirect wholly subsidiaries of Dover, including Dover Food Retail. Accordingly, Dover Food Retail has adopted and relies on these processes and policies used by Dover globally.

### *Policies*

#### Code of Conduct

The Code of Conduct (our “Code”) is evaluated and updated on a regular basis, including most recently in 2022 and embodies our high ethical standards and provides the framework for our conduct, our interactions with others, and our decision-making. The Code applies to all employees, regardless of location, position, or operating company, and is published in 18 different languages. It is the foundation on which the global ethics and compliance policies are built. Together, the Code and policies represent a significant element of the ethics and compliance program.

Under the Code, we expect our employees to comply with employment-related laws, including those related to wages, hours, and minimum age requirements. It specifically instructs employees not to tolerate the employment of children or forced labour and to refuse to do business with any suppliers or third parties who do so.

### Supplier Code of Conduct

To drive supply chain responsibility, including for issues related to human rights, on a global level, Dover expects all of its suppliers, including our suppliers, to comply with our Supplier Code of Conduct ("Supplier Code"). The Supplier Code establishes expectations regarding workplace standards and business practices for our suppliers and aligns closely with the Code of Conduct.

Pursuant to the Supplier Code we expect our suppliers to comply with applicable laws and regulations in the countries where it does business related to human rights topics such as equal employment opportunities, discrimination and harassment, freedom of association, child and forced labour, slavery, human trafficking, and health and safety. While laws, regulations, business practices, and customs can vary greatly from one country to the next, the Supplier Code sets forth the minimum requirements that all our suppliers are expected to meet. In addition, we make it clear that suppliers may report any ethical or legal concerns through our Global Hotline.

As part of the process, our suppliers are as appropriate asked to confirm that they adhere and will continue to adhere to the Supplier Code. In addition, compliance with the Supplier Code is included in the terms and conditions of our supplier contracts.

### Global Hotline

On a global basis, Dover maintains a Global Hotline that can be used by any person to report issues or concerns relating to our standards of business ethics and compliance, and to do so anonymously if they so choose, unless prohibited by local law. This hotline is available 24 hours a day, 7 days a week, and in 17 different languages. The availability of the hotline is communicated to our employees through the Code, in live and online training sessions, in our quarterly compliance newsletter, and through posters that are displayed at every facility.

In addition, there is a strict non-retaliation policy. Reports of suspected improper behavior are treated confidentially to the fullest extent possible and there is zero tolerance for retaliation against those who report suspected misconduct in good faith.

### Due Diligence

Globally, Dover maintains a comprehensive compliance vetting program that screens third parties who provide goods and services to Dover and its operating companies, including Dover Food Retail.

Prior to engaging a supplier, and periodically during a relationship with a supplier, diligence is conducted to assess their compliance with applicable laws, regulations and the Supplier Code of Conduct. The program evaluates potential and existing business partners based on factors such as the country in which they do business, the interactions they may have with government agencies, and the nature of their compensation or the level of business they do with Dover companies and sets screening standards for each third party based on the level of risk. In addition, the due diligence processes also provide for rescreening of our third parties on a regular cadence to ensure that as business realities may change, so will the corresponding screening standards. This process is generally conducted by the supply chain team.

### *Operations*

We consider the risk of Modern Slavery occurring within our operations to be low considering the level of due diligence that is applicable to our business activities, in addition to our entirely North American workforce and in-depth policies and procedures that govern our day-to-day operations and employment relationships.

From a geographical risk perspective, our employees are limited to Canada, North America, and Mexico which have a low prevalence of child and forced labour, low risk of vulnerability to child and forced labour, and fairly robust governmental responses addressing child and forced labour, as discussed by Walk Free, an international human rights group focused on the eradication of modern slavery, in all its forms, in our lifetime.

### *Supply Chains*

The due diligence process described above categorize suppliers as low, medium, and high risk based on factors such as the country in which they do business and the level of business they do with Dover companies and sets screening standards for each supplier based on the level of risk.

Based on the results of our diligence program, lack of concerns received throughout global hotline, or our interactions with the supplier including site visits we do not feel that we have high risk for forced or child labour with our direct suppliers.

Dover Food Retail is not aware of any instances of child or forced labour in our operations or supply chains for the Reporting Period. Accordingly, no steps were required to remediate child or forced labour, or the loss of income associated with remediation efforts.

### Training

Another essential aspect of the global compliance program is the training and empowering of compliance personnel and champions at Dover's operating companies and facilities around the world, including Dover Food Retail. Dover holds an annual compliance conference to promote continuous improvement, conducts quarterly meetings with compliance personnel and champions to train and share best practices, and holds regional compliance group meetings for localized training of compliance personnel and champions.

In addition, employees are expected to complete a range of compliance training programs, including but not limited to mandatory new hire and regular training on Dover's Code of Conduct, which addresses the need to abide by wage and hour laws in the jurisdictions in which we do business, and not tolerating employment of children or forced labour, and to refuse to do business with suppliers or third parties who engage in such practices, among other things.

There is also annual training for employees who have direct responsibility for supply chain management, including employees who work with suppliers. This training focuses specifically on modern slavery and human trafficking issues and ways to identify, assess, and mitigate, to the greatest extent possible, these risks in our supply chain. Our supply chain employees are expected to stay vigilant about these issues and report any suspicious activity to management so that it can be addressed.

### Assessing our Effectiveness

In carrying out the mission of our Dover compliance program, we seek to understand our key risks in order to most effectively and efficiently tailor the program to mitigate those risks and deploy compliance resources accordingly. Toward that end, our progress is measured and areas for growth identified through a compliance risk assessment process. This annual risk assessment drives key decisions, including when and how policies are updated, what training is provided and to whom, and what programs are implemented or modified.

In 2024, processes were in place that would help monitor effectiveness. The system used to facilitate the due diligence program described above has ongoing monitoring (daily) for alerts such as checking government watchlists and adverse media to assess continual compliance with applicable laws, regulations, and the Supplier Code.

As discussed in the Supplier Code, we expect suppliers to cooperate with our requests for inspections, audits, and investigations, which we may perform to assess quality and compliance with the Supplier Code of Conduct.

### Approval and Attestation

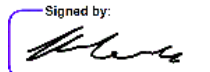
- 7 -

This Report was approved by Anthony, Inc. and Hill Phoenix, Inc. Board of Directors on May 30, 2025, pursuant to section 11(4) of the Act and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the Company. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Anthony, Inc. & Hill Phoenix, Inc.

/s/ [NTD: Signature]

Signed by:  
  
FE205E80CF68D480  
Mark Williams

Vice President & Corporate Secretary

May 30, 2025