



Annual Report – Forced Labour and Child Labour

Date: April 29, 2024

TPS Promotions & Incentives' ETI base codes is including the below and also listed on the employment handbook.

1. EMPLOYMENT IS FREELY CHOSEN

1.1 There is no forced, bonded, or involuntary prison labor.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. CHILD LABOUR SHALL NOT BE USED

4.1 There shall be no new recruitment of child labor.

4.2 Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to

enable her or him to attend and remain in quality education until no longer a child; "child" and "child labor".

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

5. LIVING WAGES ARE PAID

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. WORKING HOURS ARE NOT EXCESSIVE

6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.

6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. NO DISCRIMINATION IS PRACTISED

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. REGULAR EMPLOYMENT IS PROVIDED

8.1 To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

TPS is acutely aware of how our business impacts on society and the environment. We therefore want to ensure that those people with whom we deal and in particular our suppliers, live up to our values and standards and share that responsibility. We encourage suppliers to not only comply with our own standards, but also seek to develop relationships with their own supply chains consistent with the principles set out in the Code of Conduct.

FAR EAST SUPPLIER DATABASE

As with our more local supply base, we put a great emphasis on building lasting relationships with our approved Far East suppliers. Our Far East supplier list is managed and regularly reviewed by our compliance manager. We closely monitor ethical and environmental standards, service levels, efficiency, quality control, and pricing. Regular scheduled and unscheduled visits to our suppliers are carried out by our own personnel and our partners are audited for Quality Systems, Environmental and Ethical policies.

We employ a team of Quality Control personnel who visit the factories to make periodic QC checks using accredited systems, depending on the complexity of the manufacturing processes our personnel may stay at the factory for the duration of production.

EUROPEAN SUPPLIER DATABASE

Having been in the industry as a respected supplier for over 25 years, we have established the best trade discounts and many of the large manufacturers are working with the IGC group, this increased buying power allows us to offer the very best prices to our customers.

We put a great emphasis on forming lasting partnerships with our suppliers, many of whom have worked with us for over 20 years. Meeting with our key partners on at least a quarterly basis, we are confident that we can ensure the best service, price and innovation from our suppliers, whilst reducing risk.

Using only approved and preferred suppliers on our database, allows us to form strong and lasting relationships, monitor supplier performance, ensure that we are using only accredited suppliers and offer the best prices to our customers.

SUPPLIER CODE OF CONDUCT

Background



We expect our suppliers to have a natural respect for our ethical standards in the context of their own particular culture and to extend the same principal of fair and honest dealings to all others with whom they do business, including employees, sub-contractors and other third parties.

We ask all suppliers to agree their implementation of the standards of this policy within their own supply chain during the initial due diligence process; TPS periodically reviews this code and makes revisions when needed, which in turn we expect suppliers to adopt.

Through direct relationships and through our IGC partnerships, our suppliers with whom we have regular and recurring dealings, many of whom have SA8000 & other audit approvals, should also have management processes in place to ensure compliance with this Code. Furthermore, suppliers must make reasonable efforts to monitor and ensure that their supply chain is aware of and compliant with the intentions of our code. TPS has arranged the right to randomly review the supplier's policies, procedures or any other document related to our Code of Conduct. In some cases, TPS may require an on-site audit of a supplier's compliance to this code in addition to the normal due diligence process.

Due Diligence Process

Potential suppliers undergo a discovery meeting with a member of our senior management team.

Suppliers are then invited to complete our Supplier Questionnaire which includes their agreement to adhere to our Supplier Code of Conduct (policy below).

Following receipt of the Supplier Questionnaire, TPS's Compliance Department review the answers provided and obtain the relevant policy documents and audit reports to validate information from the Questionnaire as required.

All new suppliers undergo a credit check (Credit Safe) as standard.

On successful completion of the above and the initial transaction not generating a non-conformity report, suppliers are included on our Approved Supplier Database.

After an initial period of 6 months, suppliers are reviewed for their provision of eco and sustainable product options, along with any non-conformity reports generated. Suppliers consistently offering eco and sustainable options, who have incurred no non-conformity reports will then be included on our Preferred Supplier Database.

Suppliers' performance is routinely discussed during our monthly Sales Meetings to ensure that quality standards remain high and underperforming suppliers can be supported to improve and gain re-entry onto our Supplier Database.

SUPPLIER CODE OF CONDUCT POLICY

TPS Supplier Code of Conduct is available on our website and every supplier is required to agree to adhere to the Code in addition to encouraging their own supply chain to do the same as part of fulfilling their contractual obligations. Any supplier in breach of the obligations included in this policy



will be removed from the Supplier Database with immediate effect and provided with the appropriate improvement support before re-admission is considered.

The terms "Employee" and "Worker" used throughout this Supplier Code of Conduct covers everyone working for or on behalf of a Supplier, including but not limited to full and part-time employees, consultants, contractors, trainees, temporary workers, migrant workers, senior management and board of directors.

Ethical Conduct

The supplier shall hold their own Ethical Conduct Policy in addition to complying with all laws applicable to their business and adhering to the points below.

Health & Safety

The supplier shall strive to implement the standards of health and safety at a high level throughout the company. They shall provide a work environment that is safe and meets all applicable regulations to safeguard workers and third parties, prevent accidents, injuries and work-related illnesses. They shall carry out regular risk assessments in all areas and hold records of the subsequent control measures implemented. These will be reviewed on a regular basis. All workers will receive health and safety training with the additional provision of updates as required.

Human Rights and Fair Labour

Forced labour - Suppliers shall not use or permit any form of forced, bonded or indentured labour. All work must be voluntary, and all employees must be free to terminate their employment at any time. Suppliers will not hold employees' identity, immigration or work permit documents longer than reasonably necessary for administrative processing. Suppliers are expected not to require employees to pay recruitment fees or other fees for their employment, either directly or through third parties. The supplier shall be responsible for payment of all fees and expenses relating to employees where legally required. As part of the hiring process, suppliers are expected to provide every employee with a written agreement describing the worker's terms of employment including clearly defined disciplinary policies and procedures.

Child labour – Suppliers shall not use child labour. 'Child' means any person under age 14, under the age for completing compulsory education or under the minimum age for employment in the country, whichever is the greatest. Workers under the age of 18 will not perform work that is likely to jeopardise their health or safety, including night shifts and overtime. Suppliers may use legitimate and properly managed apprenticeship/internship programmes. Unless otherwise stated in local law, suppliers are expected to pay student workers and apprentices at least the same wage rates as other entry-level workers performing equal or similar tasks.

Wages and working hours – Suppliers shall comply with all applicable laws and mandatory industry standards regarding working hours, wages, overtime and associated benefits. Workers shall be paid in a timely manner and except in emergency or unusual situations, workweeks are



expected not to exceed 60 hours per week (including overtime) or, if less, the maximum set by local law. Workers should be allowed at least one day off every seven days.

Freedom of association and collective bargaining - Employees shall be permitted to associate freely, bargain collectively and seek representation in accordance with local laws. Suppliers are expected to permit employees to, in accordance with applicable laws, openly communicate and share grievances with management about working conditions without fear of reprisal or harassment.

Fair Treatment, non-discrimination, diversity and inclusion – Suppliers shall promote an inclusive work environment that values the diversity of its workers and will not discriminate or tolerate discrimination with respect to gender, race, religion, disability, age, sexual orientation or any other characteristic protected by law. Suppliers shall not permit harassment, abuse or inhumane treatment.

Data Privacy

Suppliers shall adhere to relevant data protection laws and regulations when data is obtained, processed, transmitted or used and shall not disclose any data that is not known to the general public. The supplier is expected to effectively manage the retention, maintenance, access, and disclosure of all confidential information in accordance with current legislation.

Anti-Corruption and Bribery

Suppliers shall comply with all anti-bribery and anti-corruption laws, regulations and standards applicable to their company. We expect suppliers to not tolerate, permit, or engage in any form of corruption, extortion, or bribery either directly or indirectly.

Conflicts of Interest

Suppliers shall disclose any potential or actual conflicts of interest to maintain transparency and effective working relationships.

Fair Dealing

Suppliers shall comply with all applicable anti-trust and competition laws and remain ethical in their activities.

Environment

Suppliers shall adopt a proactive approach towards minimizing environmental impacts and be able to demonstrate environmental management to ISO 14001 standards or equivalent. We expect suppliers to have systems in place to actively reduce discharge and use of products harmful to the environment, consumption of materials, greenhouse gas emissions, waste volumes, energy and water consumption. Suppliers shall act in full compliance with all applicable environmental laws and requirements. TPS actively encourages the use of the B Impact Assessment tool [BIA] and the Sedex Self-Assessment Questionnaire as valuable external resources in the assessment of your programs.

Business Continuity Planning

Suppliers shall plan for any disruptions to business activities and hold a Business Continuity Plan to demonstrate how employees, data and the environment will be protected in the event of a disaster such as pandemics or illness, software viruses, terrorism and natural disasters.

Compliance with this Code of Conduct forms part of all agreements entered into with TPS and we reserve the right to request additional information or an external audit in support of our efforts to uphold our social and environmental responsibilities.

Signed Attestation:



Jeffrey Ho – Import & Compliance Manager
TPS Promotions & Incentives

Address: 351 Steelcase Road West, Unit 1, Markham, Ontario, L3R 4H9. Canada.

Phone: +1 905.474.9304