

AOR Inc. S-211 Report

Introduction

This document has been compiled by Advanced Orthomolecular Research Inc. (AOR), Business Number 887126431, in compliance with Section 11 of Bill S-211 for the fiscal year ending December 31, 2023. AOR meets the criteria for a Reporting Entity as per the Act, having a place of business in Canada and engaging in business activities within Canada, in addition to meeting the necessary Entity size thresholds for revenue and assets.

AOR upholds our foundational values of transparency and ethical conduct in all aspects of our business. To date, our business operations and supply chain have shown no signs of modern slavery risks. Nonetheless, we acknowledge the critical importance of eliminating forced and child labour in Canadian supply chains. Pursuant to Section 11 of Bill S-211, this document describes the actions AOR has implemented to address risks of modern slavery and discusses potential enhancements to these initiatives moving forward.

Section A: Structure, Activities and Supply Chains

AOR is a Canadian-based company, headquartered in Calgary, Alberta, specializing in the development and manufacturing of nutraceuticals. Founded with the mission to transform scientific research into evidence-based natural health products, AOR focuses on creating supplements that are not only effective but also adhere to high quality and safety standards.

AOR operates a robust manufacturing process that includes in-house formulation, sourcing of premium ingredients from suppliers, and continuous third-party



testing in ISO-certified laboratories. Our supply chain is comprised entirely of reputable suppliers from across the globe, helping shelter us from unethical labour practices.

Section B: Policies and Due Diligence Processes

To date, we have not detected any instances of forced or child labour within our business operations or throughout our supply chain. We maintain our commitment to comply with all applicable laws and regulations. By choosing to work only with reputable suppliers, we assess the likelihood of modern slavery occurrences within our operations and supply networks as minimal. Therefore, during the previous fiscal year, we did not establish specific policies or engage in due diligence measures targeting the prevention of forced or child labour.

However, we recognize the importance of responsible business practices. Should there be any significant shifts in our supplier base that might alter our risk exposure, we are prepared to adjust our policies and operational strategies accordingly. This proactive stance ensures that we are not only compliant with current standards but are also positioned to respond to any future risks should they arise.

Section C: Forced Labour and Child Labour Risks

During the 2023 financial year, a risk assessment was not undertaken. However, in May of 2024, to pinpoint potential forced or child labour risks within our supply chain, we initiated a supply chain risk assessment. This initiative was guided by insights from the Walk Free Global Slavery Index and the US Department of



Labour's List of Goods Produced by Child Labour or Forced Labour, allowing us to locate specific risks linked to certain goods and regions.

It is crucial to note that the identification of these risks does not confirm the presence of forced or child labour in our operations or supply chains. Instead, it aims to recognize potential scenarios where such risks might arise, thereby enabling us to implement effective preventative measures. We recognize that no sector is completely immune to the risks of forced and child labour, particularly within parts of our supply chain in regions where regulatory frameworks and enforcement are less stringent.

Our risk assessment included a geographical analysis using the Walk Free Global Slavery Index to identify regions with a higher susceptibility to forced and child labour. This geographical focus was integrated with an evaluation of goods categories deemed at risk, enhancing the precision of our risk assessment approach.

Risk Assessment Findings

Our investigations identified China and India as two countries where some of our suppliers are based, as having an elevated risk of forced or child labour. However, we have not detected forced or child labour within our supply chain in these or any other countries. While both China and India exhibit only a slightly higher prevalence of modern slavery according to the Walk Free Global Slavery Index, we are committed to monitoring these risks.



Additionally, we incorporated data from the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour to isolate at-risk goods within our supply chain. This analysis confirmed that none of the specific goods we import into to Canada carry a heightened risk of forced or child labour.

While our supply chain risk assessment revealed that the overall risk of forced or child labour in our supply chain is low, we continue to prioritize vigilance in this area. The low overall risk does not diminish our commitment to risk management.

Section D: Remediation Measures

Throughout the previous fiscal year, AOR did not experience any instances of forced or child labour within our operations or supply chain. Consequently, there has been no need for remediation actions. Should any issues of modern slavery arise in our future operations, we are prepared to implement suitable and prompt remediation strategies.

Section E: Remediation of Loss of Income

Throughout the previous fiscal year, no occurrences of forced or child labour were identified in our operations or supply chains, thus no remedial actions have been required so far. Should instances of modern slavery surface in the future, we pledge to undertake necessary actions to mitigate any resulting loss of income for affected individuals.

Section F: Training



Over the previous financial year, we did not execute specific training concerning forced or child labour, as we believed our operations carried a low risk of modern slavery. Nonetheless, we are prepared to modify and enhance our training programs for employees should future risk assessments indicate a change in the future.

Section G: Assessing Effectiveness

During the last fiscal year, given that the risk of modern slavery in operations was deemed minimal, a formal review to gauge the effectiveness of our policies against forced and child labour was not performed. Moving forward, we will continue to reassess our risk environment and, if necessary, develop metrics to evaluate the effectiveness of our preventive strategies.

Conclusion

Our dedication to maintaining the highest ethical standards and compliance with Bill S-211 is absolute. Although the risk of child and forced labour within our operations and supply chain remains low, we are commitment to continuous risk monitoring. We are dedicated to keeping our practices transparent and to revise our risk mitigation tactics as required, according to changes in our risk profile.

Attestation

Following the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and 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 reporting year listed above.

Pranvit Nibber
Full name
General Manager
Title
31-05-2024
Date
Signature

I have the authority to bind Advanced Orthomolecular Research Inc.