

Modern Slavery Report 2023

Array Marketing Canada Inc.

This Modern Slavery Report is being provided on a confidential basis by Array Marketing Canada Inc. ("**Array**" or the "**Company**") on behalf of Array and its subsidiaries as required under section 11 of the federal *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the purposes of complying with the Act (this "**Report**"). This Report cannot be used or disclosed for any purpose whatsoever other than as mandated under the Act. As required by the Act, this Report addresses the period from January 1 to December 31, 2023, and is based upon the information Array has been able to confirm as accurate as of the time of submission of the Report. Array reserves its rights, without limitation, to amend or supplement the content of this Report at any time for any reason.

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading point-of-sale (POS) merchandizing business, Array recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the good faith steps we have taken prior to and during 2023 to reduce any potential risk Array may have that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by Array or of goods imported into Canada by Array.

2. Our Business

Array is a point-of-sale merchandizing manufacturer headquartered in Toronto, Ontario, Canada design, engineer, manufacture and install point of sales merchandizing solutions and retail environments. Array has a corporate office and manufacturing operations in Ontario, Canada. Array's supply chain includes businesses that supply goods and services to our organization, including temporary and permanent retail displays, fixtures and retail environments.

In total, we procure goods and services from over 1000 suppliers and factory partners. The suppliers we engage include businesses that provide raw materials such as plastic, metal, wood, and electrical components, as well as printing and applying finishes to materials such as powder coating metal. In some regions, including the Asia/Pacific region as well as North America, we partner with factory partners who support the fabrication and assembly of goods.

Relevant information about our business can be found in our 2023 Corporate Social Responsibility report. https://www.arraymarketing.com/wp-content/uploads/2024/01/Array_CSR-Highlights-Report-2023.pdf

3. Our Policies

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations or by suppliers working for us. We make every effort, including through carrying our due diligence and audits to monitor the performance of our suppliers, to prevent our activities having a negative impact on human rights. Our relevant policies are discussed in further detail below:

Code of Business Conduct and Ethics

We are committed to conducting our business in a lawful and ethical manner. Our Code of Business Conduct and Ethics (the Code) is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Array employees should always act lawfully, ethically and in the best interests of Array.

Supplier Code of Conduct

Array's Supplier Code of Conduct details the requirements and expectations we have of our suppliers, their supply chains, and factory partners with whom we engage. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Code of Conduct in their own operations and supply chain. Our Supplier Code of Conduct also sets forth our principles of inclusivity and accountability. We engage with suppliers that are committed to these same principles and suppliers commit to these standards as a condition of doing business with us. We review our Supplier Code of Conduct on an annual basis to ensure that this policy is in line with current best practices.

Whistleblower Policy

Array has a whistleblower policy and an integrity helpline to ensure that stakeholders can report any violations of our code of conduct and business ethics, or our supplier code of conduct, including those relevant to the Act. We provide a confidential helpline available 24 hours a day, 7 days a week, through which integrity concerns can be reported via a toll-free number in all countries where Array operates. This ensures that all stakeholders have a secure and anonymous way to report any issues or misconduct, reinforcing our commitment to ethical practices and corporate responsibility.

Due Diligence

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making

any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

4/5. Assessing Our Risk / Our Commitments

We acknowledge that there is the possibility that employees working in our facilities and our supply chain, based upon historical patterns unrelated to Array, are at some potential risk of forced labour or child labour. In order to assess and mitigate this risk (however small), we have made a number of actions to best ensure full compliance with the Act.

Our Commitment in Action

- Our suppliers have signed our Supplier Code of Conduct and Sustainable Procurement Program
- We conduct risk assessments of suppliers (we use an open-source template from SRA global).
- Array has an internal auditor who conducts site audits on suppliers that are aligned with SA 8000 and SMETA 4-pillar standards.
- We also enlist the support of third-party audit firms to conduct independent audits of suppliers aligned with these standards. We track corrective action plans and conduct follow up audits.
- The Company has started to link to suppliers via EcoVadis and SEDEX so that we can conduct broader evaluations of their ESG programs, including their compliance with the Act.
- We have third party audits conducted at our own factories, aligned with SMETA 4-pillar standards, and corrective actions are tracked and addressed, with results communicated to clients.

Remediation Measures

Our Code of Business Conduct and Ethics and our Whistleblower Policy require all employees and contract workers of Array to report actual or possible misconduct. We also undertake diligence efforts (as further described above in this Report) to mitigate the risk of forced labour and child labour in our business and supply chains. In the event that we discover any forced labour or child labour in our business and supply chains, we are committed to taking all necessary steps to eradicate it from our business.

Training

Finally, Array personnel at all levels are required to sign and acknowledge that our Code of Business Conduct and Ethics is understood and properly applied to our daily activities. Every new employee of Array must review and sign off on our values and policies, including our Code of Business Conduct and Ethics, and is informed of how to report wrongdoing under our Whistleblower Policy. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

6. Our Progress and Effectiveness

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date no significant concerns or complaints have been identified.

We have selected certain key performance indicators (KPIs) with respect to human rights, including forced labour and child labour, and such KPIs are reviewed by Array's senior leadership team on an annual basis. Any non-conformances identified are dealt with by the appropriate teams. Support is provided to suppliers where necessary to resolve any issues raised.

7. Approval & Signature

This Report was approved by Array Marketing Canada Inc. Chief Executive Officer on or before May 31st, 2024, pursuant to the Act and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report will also be available on our company website at www.arraymarketing.com.

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 [Array Marketing Canada Inc.](#) 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.



Stephen Kremser
Chief Executive Officer

I have the authority to bind Array Marketing Canada Inc.