

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT REPORT

INTRODUCTION

This report is prepared by BCP VI Trillium Holdings Limited (the “Company”, together with its subsidiaries, the “Trimco Group” or the “Group”) pursuant to section 11(1) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), Canada. This report details the steps taken from January 2023 to December 2023 to prevent slavery, servitude, forced or compulsory labour and human trafficking taking place in any part of our business or our supply chains. This report will also cover some ongoing business action plans and initiatives from 2024 onwards.

BCP VI Trillium Holdings Limited is the top holding company of Trimco Group engaged in industry of manufacturing and providing labels, tags, accessories and packaging solutions to garment factories and operates in full consideration of the need for ethical business practices, including in respect of human rights and decent working conditions.

Trimco Group operates in following countries or jurisdictions: Bangladesh, Canada, China, Denmark, Germany, Hong Kong, India, Netherland, Norway, Pakistan, Romania, Singapore, Sweden, Thailand, Turkey, United Kingdom, United States & Vietnam.

Trimco Group’s commitment towards ethical business practices is documented in the Group’s Code of Business Conduct & Ethics, Human Right Policy, Supplier’s Code of Conduct & international standard and certifications such as, BSCI, SEDEX/SMETA, which was implemented throughout the Group globally in 2023. The entire Group is fully aware of, and committed to, its legal and moral obligations to prevent modern slavery, child labour and human trafficking or any other human right violation. BCP VI Trillium Holdings Limited (together with the Group) is committed to improving its practices wherever possible regarding the fight against modern slavery and human trafficking, also all ethical business practices.

The Group is committed to conducting its business in an ethical and responsible manner, including by carrying out our own business activities in a way that respects and supports the protection of human rights through striving for the:

- a. elimination of discrimination in employment;
- b. prohibition of modern slavery, including child and forced labor; and
- c. eradication of harassment and physical or mental abuse in the workplace.

We are working to embed these standards into all of our core business activities, including training, communications, contracts and due diligence processes, as appropriate. These practices extend to our interactions with our key suppliers and other business partners either locally in Canada or globally.

SUPPLY CHAIN STRUCTURE, SELECTION AND MONITORING

The supply of goods, services and products to the Group's business units is managed by the local subsidiaries, with support and assistance from the Group's procurement team. The Group's procurement team deals with Corporate Social Responsibility in order to assist local teams with selecting business partners. Although the Group's main business partners are located in Europe and North America, the Group sources goods, services and/or product such as textiles, ribbon and some raw material from China and other parts of Asia, including India and Bangladesh. Supply chain ethical work is an important expectation from Group's panel of business partners. We work with our business partners closely in order to facilitate the implementation of the Group's ethics values, including our efforts to fight against modern slavery, child labour, human trafficking and/ or any human right violation.

INTERNAL POLICIES, PROCEDURE, RISK ASSESSMENT AND CONTRACTUAL CONTROLS

The Group is committed to upholding and promoting human rights as defined in internationally agreed human rights instruments. We recognize the importance of treating all stakeholders within our value chain with dignity, respect, and equality. Our commitment extends to complying with applicable national and international laws, including the following key human rights instruments:

- United Nation Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- The International Labour Organisation's (ILO) Declaration of the Fundamental Principles and Rights at Work and the ILO Core Conventions
- International Labour Organisation (ILO) Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- The UN Guiding Principles on Business and Human Rights and the associated Gender Dimensions of the UNGPs
- United Nations Convention on the Rights of the Child
- The OECD Guidelines for Multinational Enterprises, and the OECD Due Diligence Guidance for Responsible Business Conduct

We also utilize tools such as SMETA SEDEX Version 6.1 and BSCI 2023 to ensure responsible business practices. This reflects our unwavering commitment to respecting human rights across all aspects of our operations.

SEDEX

Management Systems & Code Implementation
 Freely chosen employment
 Health and Safety
 Child Labour and Young Workers
 Wages and Benefits
 Working Hours
 Discrimination
 Harsh or Inhumane Treatment
 Environment

BSCI

PA 1: Social management systems and cascade effect
 PA 2: Workers involvement and protection
 PA 3: The rights of freedom of association and collective bargaining
 PA 4: No discrimination
 PA 5: Fair remuneration
 PA 6: Occupational health and safety
 PA 7: No child labour
 PA 8: Decent working hours
 PA 9: Special protection for young workers
 PA 10: No precarious employment
 PA 11: No bonded labour
 PA 12: Protection of the environment
 PA 13: Ethical business behaviour

The Group is committed to conducting our business in a legal, responsible and sustainable manner that is ethically sound and genuinely concerned about the welfare of our people, communities, our stakeholders and natural environment. We believe that the main risks regarding modern slavery relate to the business partners, especially suppliers in higher risk jurisdictions. A significant part of the Groups' supply chain is selected through our global headquarter procurement team and legal and compliance department in Hong Kong. Concentrating the purchasing of goods and services will provide better oversight of the Group's supply chains. Furthermore, it ensures that the supplier selection and purchasing process is carried out by a team who is duly trained and skilled in relation to ethical and responsible purchasing.

Since 2024, major suppliers are required to comply with the Group's vendors onboarding standard of procedure where due diligence exercises will be performed and the major suppliers are also required to sign supply contract and Supplier's Code of Conduct if they want to supply any goods or services to the Group. In addition, they are required to comply with international standards such as BSCI, SEDEX/SMETA and those suppliers who refused or unable to comply with these standards may be terminated by the Group. Regular audit and inspections will be performed either by us or independent third parties to ensure that they are complying with international ESG standards which includes human right.

GROUP POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The Group's maintain a Zero-Tolerance policy towards any breach of human rights, including but not limited to modern slavery, child labour and human trafficking. The Group is committed to operate in accordance with the law and to promote the highest standards of integrity and share their values with employees and business partners and continuously through communication maintaining high awareness in the Group and also other locations. As part of our ongoing compliance and monitoring effort, we have also prepared Trimco Supplier Code of Conduct which we adopted the amfori BSCI

Code of Conduct which aligns with international labour regulations, encompassing the Universal Declaration of Human Rights, the Children's Rights and Business Principles, UN Guiding Principles for Business and Human Rights.

Furthermore, the Group keeps close relationship with supply chain, maintains good communication with the business partners in different locations, looks after the local culture, also regularly enhances the process in efforts to provide a transparent and fair working environment to employees, towards supply chain, enable the employees to growth together with the Group. The Group also actively contributes to the local communities which we always care about. These are the core value and visions of the Group. The Group has been regularly working on Responsible and Ethical Purchasing, which includes Cooperate Social Responsibility and Sustainability principles. We published our CSR reports on Trimco Group website ([https:// www.trimco-group.com](https://www.trimco-group.com)). By clearly setting out those principles, we are able to reinforce Group's expectations of business partners (such as suppliers) in relation to ethics, including in respect of human rights. The Group requires business partners to undertake to comply with its terms and therefore limit their environmental impacts, work towards sustainable development and act ethically.

Specifically, the policies of the Group requires the Group's business partners to comply and maintain:

- Recognize and respect the protection of internationally proclaimed human rights.
- Apply International recognized ethical standard as company policies to supply chain, such as BSCI, SEDEX/SMETA, ethical supply chain management principles on human rights and labour.
- Strictly prohibit the use of child labour or any form of slavery, forced labour and human trafficking.
- Provide a safe working environment for employees.
- Zero-Tolerance to any kind of corruption including extortion, bribery, and influence peddling.
- Ensure labour conditions are fair, employees are paid a regular salary in accordance with their employment contracts and the laws, and all legal requirements are complied with.
- Prevent any form of discrimination based upon any distinction such as race, gender, age, ethnicity, political opinion, origin etc.
- Provide regular training, communication sessions to employees maintaining high level of transparency, ethical awareness for the Group, and employees working with us.
- Continuously implement the programs to lead the Group to growth in sustainable ways. In addition, the Group also benefit from a whistleblowing line supported by a procedure enabling employees to report and/or raise concerns internally to the Legal & Compliance department and to report information which the individuals believe highlights or could indicate illegality, unethical behaviour or other serious wrongdoing, including but not limited to any instances or suspicions of modern slavery.

DUE DILIGENCE, MANAGEMENT OF MODERN SLAVERY RISK

The Group supports the implementation of global policy with our business partners, mainly suppliers, through audits that may be carried out through the internal compliance teams, or with the help of independent international recognized external audit company. These audits are intended to check that business partners are properly applying the Group's ethics and human right principles. The Group's internal processes are complemented by an assurance provider's independent audits which report levels of compliance among the Group's business partners and alert the Group to any areas that require improvement. In order to ensure the efficiency of audit operations, the Group is implementing the audit methodology. This audit methodology mainly comprises the following elements:

- Comply Group's ethical standard and policy.
- An evaluation of the business partners with respect to CSR such as BSCI, SEDEX/ SMETA, or SA8000, OEKO-TEX, BLUESIGN, FSC, GRS, or through compliance with international auditing standards. The process also enables the Group to optimize our business partners audit process by defining and prioritizing the audit operations. If, on completion of an audit, a business partner is found not to be in compliance with the Group's ethical requirements, a business partner may be given a period to develop and implement necessary corrective actions; in some serious cases, the Group may terminate the business relationship with such business partners, remove them from our supply chain immediately.

MONITORING EFFECTIVENESS

The Group conducts internal and external audit at business partners premises regularly, ensuring no serious compliance breach. No cases relating to modern slavery were reported or raised through audits in 2023 from internal compliance team or external auditors.

Through our Product DNA® monitoring system, we actively monitor our own sites and suppliers to identify and address human and labor rights risks. This includes addressing issues related to *discrimination, equal opportunity, fair compensation, the right to organize collective bargaining, and freedom of association.*

Human Rights Due Diligence Process

All our factory sites have already set up a system to comply BSCI, SMETA SEDEX, local regulations, and customer requirements i.e. SOP in all sites.

All our factory sites are required to register their social due diligence certificates of ourselves and their suppliers with Product DNA®.

We assess the state of human rights related issues in each site on Product DNA®, using the tools provided by BSCI or SMETA SEDEX for in-house and suppliers assessment /selection.

Our internal compliance team conduct regular internal audits /assessments, including those for new and existing suppliers.

A corrective action plan is required from the factory production sites which were assessed C or lower scores in any BSCI areas or NC/ OBS in SMETA SEDEX.

PROVIDE NECESSARY TRAINING AND COMMUNICATION WITHIN THE GROUP

It is important that the Group's staff are aware of and understand the risks of slavery and human trafficking. Staff must be able to identify signs of slavery and human trafficking and be aware of what action to take if such activities are suspected. The Group will, therefore, provide necessary training opportunities at appropriate levels globally.

FURTHER STEPS AND MONITORING

The Group is aware of the pernicious nature of modern slavery and therefore understand that the steps the Group takes regarding risk associated with modern slavery should not be static. The Group will continue to monitor operational practices, review the approaches and continue to build on this in the year ahead.

THE GROUP HAS IDENTIFIED THE FOLLOWING AS KEY ACTIONS FOR 2024:

- Enhancing the staff awareness by provide necessary training within organization. A series of human right trainings have been planned and initiated in year 2024.
- Enhancing the compliance team approaches and develop/search the international recognized tools, continuous monitoring supply chain effectively.
- Reviewing and improving procurement and vendor's selection and onboarding process, and enhance the supply chain risk management process.
- Close communication with business partners, regularly promote compliance awareness.

In accordance with 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.



Amy Chuk Kwan, WAN

Group Chief Executive Officer

31 May 2024

I have the authority to bind Trimco Group

BCP VI Trillium Holdings Limited

(the "Company")

UNANIMOUS WRITTEN RESOLUTIONS OF THE BOARD OF DIRECTORS OF THE COMPANY

May 31, 2024

1 Declaration of Interest

It is noted that each director of the Company (each a "Director" and collectively, the "Directors" or the "Board") has declared his/her interests in the matters in the manner required by the laws of the Cayman Islands and/or the amended and restated memorandum and articles of association of the Company (as amended from time to time, the "Articles").

2 Canadian FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT (the "Act")

2.1 It is noted that the Company is required to prepare and file a report to Canadian government pertaining to the works which have been undertaken by the Company in complying with the Act (the "Report").

2.2 Draft of the Report has been provided to and reviewed and considered in detail by the Directors.

2.3 It is noted that it is in the Company's legal obligations and business interest that the Company should approve the Report and the filing thereof (the "Filing").

3 Resolutions

3.1 It is unanimously resolved that:

- (a) It being in the Company's commercial interests and legal obligations that the Company approves:
 - (i) the Report; and
 - (ii) the Filing;
- (b) the Report be approved, subject to such amendments and additions thereto as any Director shall in such Director's absolute discretion and sole opinion deem appropriate, the signature of such Director on the Report being due evidence for all purposes of such Director's approval of any such amendment or addition and the final terms thereof on behalf of the Company;
- (c) any Director be authorised to give, make, sign, execute (under hand or seal or as a deed) and deliver the Report and any agreements, letters, notices, certificates, acknowledgements, receipts, authorisations, instructions, releases, waivers, proxies, appointments of agents for service of process and other documents (whether of a like nature or not) ("Ancillary Documents") as may in the sole opinion and absolute discretion of any Director be considered necessary or desirable for the purpose of completion and filing of the Report;
- (d) any Director be authorised to do all such acts and things (including, without limitation, being adopted as if set out in these resolutions in full, and any Director or any other person

authorised by resolution of the Directors, all acting singly (unless otherwise resolved) being appointed as authorised signatory with respect to any such accounts) and to agree all fees, as might in the sole opinion and absolute discretion of any Director be necessary or desirable for the purpose of completion and filing of the Report;

- (e) the Ancillary Documents be in such form as any Director shall in such Director's absolute discretion and sole opinion approve, the signature of such Director on any of the Ancillary Documents being due evidence for all purposes of such Director's approval of the terms thereof on behalf of the Company; and
- (f) all prior actions taken by any Director, officer and agent for and on behalf of the Company in connection with the Report, the Filing and the foregoing resolutions, including but not limited to, the signing of any report, questionnaire, resolutions, deeds, letters, notices, certificates, acknowledgements, receipts, authorisations, instructions, releases, waivers, proxies and other documents (whether of a like nature or not) and the payment of all and any related fees and expenses be confirmed, ratified and approved in all respects.

[signature page follows]

IN WITNESS WHEREOF, the undersigned has executed these resolutions on the date first above written.



Miranda Shui Yau KONG
Director



Chuk Kwan WAN
Director

Qi YANG
Director

Weixun HUANG
Director

Yu CAO
Director

Shiv Kumar GUPTA
Director

Victor Herrero Amigo
Director