

Forced Labour in Canadian Supply Chains – Annual Report – 2024

Legal Name & Address : Copley Ltd
107 MacNab St North
Hamilton, Ontario, Canada

Industry: Manufacturing, Apparel

Financial Reporting Year: January 1, 2023 – December 31, 2023

Report Revision: N/A – Initial report

Business Number – 843347931

Joint Report: No

Other jurisdiction reporting requirements: N/A

A) Structure, Activities and Supply Chain

Copley Ltd (Copley) has been manufacturing tailored clothing in Hamilton, Ontario since 1883. Copley is incorporated in the province of Ontario and is currently wholly owned by the Tom James Company, headquartered in Franklin, Tennessee, USA. Copley's manufacturing facility and administrative offices are located in Hamilton, Ontario. Copley employs approximately 260 employees, including a team of 6 salesmen, located in Canada and the US, led by a President of Sales. Locally, Copley's day to day operations are led by a Vice President of Operations, and supported by an administrative team of Finance, Human Resources, Customer Service & Marketing and Manufacturing & Design. 215 hourly employees produce custom tailored and ready to wear menswear for retailers across Canada and the United States. Copley also produces custom clothing for the Tom James Company, whose sales force in the United States, Canada, the United Kingdom and Australia, sells directly to individuals. Currently Copley produces in excess of 300 garments per day. Copley's workforce is very diverse and many have a long service history of 30+ years. With the exception of 5 members of the sales team, all of Copley's employees work in Hamilton, Ontario. Copley's customers are located in Canada and the US. 30% of sales are made to Canadian retailers, with the remaining 70% sold to US customers. Copley imports cloth from mills in Italy, Scotland and Chile. The mills in Scotland and Chile are sister divisions, both wholly owned by the Tom James Company. All divisions under the Tom James umbrella are held to the same standards of business and purchasing practices. Lining and trim, and all other manufacturing inputs are primarily purchased from Canadian companies in Ontario and Quebec, as well as the United

States. The majority of Copley’s purchases are made in Canada, followed by Italy, the US and the United Kingdom.

For the most recent 2 fiscal years, the distribution of disbursements made by Copley is as follows:

Country	% of Disbursements
Austria	0.016%
Belgium	0.158%
Canada	68.828%
China	0.018%
Chile	1.428%
Czech Republic	0.004%
Germany	0.192%
Ireland	0.008%
Italy	14.007%
Japan	0.081%
United Kingdom	6.656%
United States of America	8.605%
	100.00%

B) Policies and Due Diligence Processes

Copley does not currently maintain policies and due diligence processes directly related to forced and child labour. However, Copley does maintain policies in accordance with the Ontario Employment Standards Act, 2000 as well as the Occupational Health & Safety Act of Ontario, the Workplace Safety & Insurance Act, the Human Rights Code, and the Labour Relations Act. These include, but are not limited to, policies regarding Employee Health and Safety and Workplace Violence and Harassment Prevention.

100% of Copley’s manufacturing takes place in Hamilton, Ontario. Copley does not outsource any production offshore. Copley’s hiring practices include screening of potential employees to ensure they are properly approved to work in Canada. Most of Copley’s employees are hired after prospective employees apply to job advertisements on Indeed, or through walk in applications.

C) Forced Labour and Child labour Risks

Copley does not currently have the training or the foreign intelligence to properly identify risks in its supply chain. However, given the fact 98% of our disbursements take place in countries identified as lower risk on the Global Slavery Index, we can be reasonably confident that the risk is on the low side. At this point, we cannot accurately identify and address risks of this nature.

D) Remediation Measures

None currently

E) Remediation of Loss of Income

None currently

F) Training

Not currently in place

G) Assessing Effectiveness

Not currently in place

This report has been reviewed and approved by the Copley Board of directors and officers.

Craig Forrest – Executive Vice President and Board member

John Hitt – Board member

Deana Blair - Director of Finance & HR and Board member

Mark Metzgar – Secretary

Roy Nicholls – Vice President of Operations

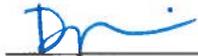
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true,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

Roy Nicholls
Vice President, Operations
April 30, 2024



I have the authority to bind Copley Ltd.

Deana Blair
Director, Finance and Human Resources
April 30, 2024



I have the authority to bind Copley Ltd.