

# ROGUE®

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## Introduction

This report is Coulter Ventures LLC dba Rogue Fitness' response to comply with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act") for the financial year ending December 31, 2023. The reporting entity covered by this statement is Coulter Ventures LLC dba Rogue Fitness.

For the purposes of the Act, Coulter Ventures LLC dba Rogue Fitness' ("Rogue Fitness", "Rogue", "The entity") meets the entity and reporting entity definition by doing business in Canada and meeting the reporting entity threshold requirements.

Rogue Fitness is incorporated in the US and sells goods in Canada and is obligated to submit a report to the Minister of Public Safety and provide a public report in response the Supply Chains Act by May 31, 2024.

Rogue is the official equipment supplier of the CrossFit Games, USA Weightlifting, the Arnold Strongman Classic, and the World's Strongest Man competition. The company remains dedicated to serving the needs of serious athletes at every level, from the garage to the arena.

Guided by its purpose to source locally whenever possible, and build a self-sustaining community, Rogue Fitness strives to be a leader in everything it does and expects its representatives to act with accountability, commitment to excellence, integrity, respect, responsiveness, flexibility, and transparency.

Forced labour and child labour is contrary to our statement of purpose, vision, and values, therefore Rogue Fitness does not endorse any human trafficking and modern slavery within its organization or any organization with whom it conducts business.

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## 1. Structure, Activities and Supply Chain

Rogue Fitness is a proud American manufacturer of fitness equipment, and the primary purpose of the operations is to manufacture and distribute Rogue Branded fitness equipment and resale of fitness equipment.

Rogue Fitness is a worldwide company that has operations in the US, Belgium, Finland, and Australia, and it has over 600 staff members. Rogue Fitness works with several organizations to source goods to manufacture fitness equipment in the US.

Using the NAICS (North American Industry Classification System) Canada 2022 Version 1.0, sectors in Rogue Fitness's supply chain and related activities were classified into the following industries

- 33 – Manufacturing
  - 3399 - Other miscellaneous manufacturing,
    - 339920 - Sporting and athletic goods manufacturing
- 44 – Retail trade
  - 4541 - Electronic shopping and mail-order houses
    - 454110 - Electronic shopping and mail-order houses

## 2. Policies and Processes in Relation to Forced and Child Labour

Rogue fitness did not have policies or processes in place which addressed forced and child labour in the supply chain for the previous reporting year.

Rogue Fitness maintains purchasing Policies across its organization. Honesty and due diligence are the fundamental pillars of its supply chain principles and ethics.

In line with our commitment to compliance with labour laws, Rogue Fitness employs an in-house Associate General Counsel for Labour & Employment, who helps us maintain a deep expertise in this domain.

Rogue Fitness is committed to combating the issue of child and forced labour, an issue which affects more than 27 million people worldwide. Rogue Fitness will work to incorporate provisions pertaining to child and forced labour in the supplier onboarding package.

## 3. Identification of Forced and Child Labour Risk

To understand where in the supply chain forced or child labour risks may exist, Rogue Fitness recently carried out a risk assessment process. This process was guided by insights provided by the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and by the US Department of labour's List of Goods produced by Child Labour or Forced Labour. In conducting our supply chain forced and

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child labour risk analysis, we were able to highlight potential risks of forced or child labour associated with certain goods and certain countries.

Our risk identification exercise does not presuppose the actual use of forced or child labour within our operations or supply chains, rather, it is aimed at recognizing potential scenarios where such risks might arise, thereby further enabling us to implement effective preventative measures. Our assessment acknowledges that no industry is entirely exempt from the risks of forced and child labour and there are inherent vulnerabilities within certain sectors of our supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be robust.

Our analysis considered specific geographic regions that, according to the Walk Free Global Slavery Index and other credible sources, present a higher risk of forced and child labour practices. This geographic risk assessment, was combined with an assessment of at-risk-goods categories, further enabling us to apply a targeted lens to our risk assessment.

## **Risk Assessment Findings**

Through the application of the analysis, Rogue Fitness identified suppliers with products in two countries which have a high prevalence of slavery — Pakistan and India. It is important to note that these countries only account for 0.3% of the total spend amount in Rogue Fitness' supply chain. A significant portion of our spend, 82.9%, is associated with suppliers based in the US, a country which is widely accepted as having low prevalence of slavery.

Rogue Fitness also considered the data from the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour. This is an important step in isolating specific goods from our import portfolio that may be susceptible to forced or child labour. This analysis revealed that none of our imported products are likely to be subject to a risk of being associated with forced or child labour practices.

Overall, the findings from our risk assessment suggest that there is minimal exposure to forced and child labour risks within the supply chain.

Rogue Fitness would like to reiterate its commitment towards fighting the issue of child and forced labour in supply chains. Please refer to Section 2 of this report, which outlines the current mechanisms and policies, along with the improvement efforts by Rogue Fitness, to mitigate this risk; and the related efforts to enhance or update applicable policies or procedures.

## **4. Remediation of Forced and Child Labour**

After a thorough audit of our supply chain, Rogue Fitness has not found any instances of forced and child labour in the previous reporting year.



#### 5. Remediation of Loss of Income

After a thorough audit of our supply chain, Rogue Fitness has not found any instances of forced and child labour in the previous reporting year, and hence, have not identified any vulnerable families which may have experienced a loss of income.

#### 6. Employee Training

Currently there is no training that is given to the employees of Rogue Fitness that focuses on forced or child labour. However, Rogue Fitness has an employee training and onboarding framework in place.

Rogue Fitness understands the importance of creating awareness amongst its employees on forced and child labour in its supply chains. Hence, Rogue Fitness will be working with supply chain personnel and vendors to increase awareness on child and forced labour issues.

#### 7. Assessing Effectiveness

Rogue Fitness is not able to determine current effectiveness of measures to assess and manage our risk of forced or child labour for the previous reporting year.

To address this, Rogue Fitness will implement an annual process of contacting suppliers to review standards and guidelines established by the US Department of Labor. This review will be incorporated into the new supplier onboarding process.

Rogue Fitness is committed to continuous improvement on this subject as an organization to ensure transparency and accountability in our supply chain operations.

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## 8. Approval and Attestation of the Report

In accordance with the requirements of the Act, and in particular Section 11, 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 due 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.

Full Name: Mitchell Durkop

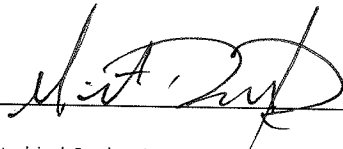
Full Name: Kevin Payne

Title: Director of Supply Chain

Title: Chief Financial Officer

Date: May 31, 2024

Date: 5/31/24

Signature: 

Signature: 

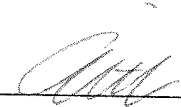
"I have the authority to bind Coulter Ventures LLC dba Rogue Fitness"

"I have the authority to bind Coulter Ventures LLC dba Rogue Fitness"

Full Name: Andy Bassitt

Title: Director of Supply Chain

Date: 5/31/24

Signature: 

"I have the authority to bind Coulter Ventures LLC dba Rogue Fitness"