

Report under S-211: Addressing Forced Labour in Supply Chains

1. Introduction

This report constitutes the first modern slavery report for Crystal Water Investments for the fiscal year concluding on December 31, 2023. This is a consolidated report covering all entities operating under the group. The objective of this report is to outline our efforts in identifying, addressing, and mitigating risks associated with forced labour and child labour within our supply chains.

2. Structure, Activities, and Supply Chains

Crystal Water Investments is owned and controlled by Aqua Leader Holdings Inc.

Our Canadian headquarters are situated at 2370 Rue de la Province, Longueuil, QC, J4G 1G1. Our primary activities involve the production and distribution of plastic injection molded parts for above-ground pools. All our employees are based in Canada. Our supply chain extends domestically and internationally, involving the import of resin from the USA and Canada, and molds from China.

3. Policies and Procedures

As of the reporting period, Crystal Water Investments does not have specific policies directly addressing forced labour and child labour. However, we have initiated steps to develop and implement these policies:

- **Due Diligence Processes:** We have a centralized supplier approval process to ensure all new suppliers adhere to our standards. This process involves detailed assessments and verification against our supplier code of conduct.

- **Supplier certification:** We are requesting our top suppliers to provide a *Supplier Certificate Statement* regarding forced and child labour, which includes the following compliance points:

- a) **Modern Slavery and Child Labour Policy:** Suppliers must establish formal policies explicitly addressing modern slavery and human trafficking.
- b) **Communication:** Effective communication of policies on forced and child labour to their supply chain.
- c) **Supply Chain Due Diligence:** Processes for identifying, assessing, and mitigating risks of forced and child labour.
- d) **Compliance with Legislation:** Adherence to relevant forced labour and child labour legislation and regulations.

- e) **Continuous Improvement:** Ongoing monitoring and enhancement of efforts to combat forced and child labour. The *Supplier Certificate Statement* can be accessed on demand.

4. Risk Assessment

We have not identified risks within our supply chain. We conduct regular internal assessments and engage in continuous dialogue with our suppliers to evaluate and address potential risks.

5. Actions Taken

To date, no instances of forced or child labour have been reported within our supply chains. We have not identified loss of income for vulnerable families resulting from measures taken to eliminate forced and child labour. However, recognizing the potential risks, we have taken proactive measures:

- a) **Enhanced Supplier Screening:** Implement rigorous screening processes for current and new suppliers.
- b) **Risk Assessment Tools:** Develop and implement a risk assessment procedure to identify and mitigate risks in the supply chain, including geographic and sector-specific risk factors.
- c) **Ethical Sourcing Policies:** Update and enforce strict ethical sourcing policies that clearly outline expectations and consequences for non-compliance with labour standards.
- d) **Zero-Tolerance Policy:** Implement a zero-tolerance policy for forced labour and child labour, with clear consequences for violations, including termination of contracts.

By implementing these measures, we are confident that we can substantially mitigate the risk of forced labour and child labour in our overseas manufacturing operations and among our local suppliers.

6. Monitoring and Effectiveness

Starting in 2024, we will implement robust methods to track the effectiveness of our policies and procedures related to forced and child labour. This will include regular audits to ensure compliance with established standards.

7. Training

We intend to implement an awareness and prevention of forced and child labour training program for key employees.

Approval and Attestation

In compliance with the requirements of the Act, specifically section 11, I hereby attest that I have thoroughly reviewed the information contained in this report. Exercising reasonable diligence, I confirm that the information presented is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year specified above. I have the authority to bind Aqua Leader Holdings Inc. and all of its subsidiaries.

Full Name: Guy Parent

Title: Vice President

Date: 2024-05-31 | 10:12 EDT

Signature: 