

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR 2023 REPORT

I. INTRODUCTION

This report (“Report”) is produced by Curriculum Associates, LLC. (“CA” or “Company”) for the year ending December 31, 2023, pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”). This report is the first report prepared by CA pursuant to the Act. This Report to be updated and published at least annually.

CA was established by educators with a mission to make classrooms better places for both teachers and students by developing instructional and diagnostic solutions.

CA is founded and operated on a well-defined set of core values and commitments. These foundation values are central in creating an industry leading experience for our users, employees, and vendors alike. From service excellence, integrity and diversity, equity, inclusion and belonging, to practicing conscious capitalism, CA aims to demonstrate our values in the way we conduct business each and every day.

Modern slavery is a complex issue and CA regularly reviews its policies and procedures that take a multifaceted approach to identify, prevent and reduce the risk that forced labour or child labour was used in any step of its supply chain or manufacturing process.

Forced Labour and Child Labour Definitions

Under the Act, “forced labour” and “child labour” are defined as follows:

Forced Labour means labour or service provided or offered to be provided by a person under circumstances that: (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (b) constitute forced labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

Child Labour means labour or services provided or offered to be provided by persons under the age of 18 years and that: (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada; (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

II. STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

CA partners with educators to improve classrooms, advance literacy and increase student engagement. Primarily, CA provides technology and programming support for classrooms to educators, and through this, publishes and manufactures books.

CA considers its suppliers to be important and valued business partners. The suppliers CA engages with range from local to global. One of CA's primary goals is to provide outstanding value to its users, including educators and students alike. This means working with only the best manufacturers to provide the highest quality books. Accordingly, CA actively develops and evaluates our vendor partner business relationships on an ongoing basis.

CA acknowledges that the most significant risk of forced labor and child labor lies within our network of suppliers and vendors who collaborate with us in the printing process for our books. This is why CA requires that all publishers, and printers of our books that it engages with, attest and confirm that they do not use child labour in the manufacturing of our books. Throughout this process development and implementation pursuant to the Act, CA seeks to gain visibility into our suppliers' and manufacturers' supply chains. As presented in this Report, CA manufacturers and suppliers are expected to remain in material compliance with all applicable laws, including but not limited to the Act.

III. POLICIES AND DUE DILIGENCE PROCESSES

CA is and remains committed to taking into consideration and addressing human rights due diligence, environmental, social, and governance impact of business activities into its policies, procedures and decision making.

For the purposes of this Report, the CA Legal team reviewed the Act to help identify the potential impact and assess the effectiveness of the steps taken and to be taken to address the risks of forced labour and child labour.

CA imparts its expectations regarding a code of conduct as published in the employee handbook. Generally, the employee handbook is reviewed and updated on a rolling or annual basis, depending on need. CA has a framework for asking questions and highlights resources in place to report any concerns. These policies and procedures allow for anonymous and confidential reporting if wanted. CA encourages the reporting of actual or potential non-compliances with our policies or with legal requirements. Accordingly, CA offers several methods and mediums for reporting violations to reflect such commitment.

CA's suppliers and manufacturers are expected to uphold industry standards of compliance including, but not limited to, all applicable laws, rules and regulations, wage and hour laws, unlawful labour practices (e.g., forced labour and child labour), and engaging in its products process in a safe manner.

Further, despite the low to minimal risk of modern slavery in CA's supply chain, CA is committed to: (i) engaging in due diligence with its suppliers to promote ethical labour practices, and (ii) ensuring compliance with all applicable law and regulations.

CA has taken steps (and is continuing to take steps) to minimize the risk by conducting a review of its current supplier network. CA is in the process of assigning internal risk levels to various categories of suppliers. Through this review, CA is aiming to reduce or eliminate the potential of forced labour or child labour in its supply chain.

In the coming year, CA plans on expanding its review of its supply chain by:

- Enhancing due diligence and risk management activities related to key sustainability issues, such as forced labour and child labour;
- Ongoing mapping of its supply chain with suppliers who have directly contracted with CA for higher-risk suppliers or manufacturers;
- Building out CA's processes and policies for preventing forced labour and child labour in the supply chain, which may include implementing and updating: (i) procurement policies, and (ii) the processes related to supplier due diligence, onboarding, and compliance;
- Implementing and updating internal educational training; and
- Updating supply chain contract templates for language that prohibits forced labour and child labour.

More work is underway internally to monitor supplier activities efficiently and effectively with respect to modern slavery, and CA's risk assessment as set out in this section may change as more information becomes available through CA's ongoing review and diligence.

IV. STEPS TO PREVENT AND REDUCE RISK

Although CA's exposure to possible forced labour and child labour risks is considered low, the nature of our business requires procuring many supplies and materials from different manufacturers and suppliers. CA strives to always conduct its operations in compliance with applicable laws and regulations. Risks in the CA supply chain arise from limited visibility into our suppliers' and manufacturers' supply chains.

Further, CA is considering the following requirements or actions to allow greater visibility into the supplier supply chain: enhanced contractual terms and/or terms and conditions, supplier or manufacturer certifications and/or questionnaires, site visits, third party inspections, or termination of the relationship. CA's intention is to engage with suppliers and manufacturers on issues of addressing forced labour and child labour. The intention behind the supplier contracts will be to help demonstrate the suppliers' commitment to compliance. Part of the steps taken by CA to accomplish greater visibility to the appropriate supply chains will include a review and analysis of current policies, procedures, and contractual clauses related to issues of identifying and addressing forced labour and child labour.

While the information in this Report represents the current known risks and actions undertaken by CA, more work is underway to monitor supplier activities as well as higher-risk categories and countries that may change in the future as we learn more. In 2023, there were no issues found concerning forced labour or child labour issues. CA will continue to monitor, review, and build out its internal and external mechanisms to help address issues of forced labour and child labour.

V. TRAINING

CA has mandatory and optional trainings that it provides for all levels of employees. These trainings include but are not limited to a commitment to the highest level of standards by CA.

CA is in the process of exploring more specialized, in-person training sessions to continue to foster a culture that helps increase awareness and address potential issues of forced labour and child labour across all facets of our operations and supply chain. We anticipate providing training on the issues of forced labour and child labour in 2024.

VI. ASSESSING EFFECTIVENESS

Identifying and working toward assessing effectiveness of the policies and procedures implemented will require continued internal commitment and communication as well as relationships with third parties. As CA continues to build out internal and external mechanisms for itself and third parties, it will conduct a review and/or audit of the policies and procedures related to forced labour and child labour. Doing so, will help track relevant performance indicators, such as employee awareness, number of cases reported, non-compliance mechanisms triggered, and number of contracts with relevant forced labour and child labour clauses.

As discussed in this Report, we used our strong value-oriented foundation to help guide us towards preventing and reducing forced labour and child labour risk in our supply chains. We will work towards taking additional active steps to help assess the effectiveness of the internal and external mechanisms we introduce.

VII. REMEDATION

As of December 31, 2023, CA has not faced situations of forced labour or child labour. Therefore, CA has not had to remedy and/or rectify as much. If any such situation is identified, CA will work to develop and implement a corrective plan to improve and/or remedy in a prompt manner.

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 the entity listed above. 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.

I have the authority to bind CA.



Robert Waldron

Chief Executive Officer

May 30, 2024