



ANNUAL REPORT

Purpose

This annual report for the 2023 financial reporting year has been created by David's Bridal Canada Inc. ("**David's Bridal**") for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the "**Act**").

Organizational Structure, Activities, and Supply Chains

David's Bridal is a retail organization that specializes in the sale of wedding dresses, other formal wear and accessories. David's Bridal is principally located in Toronto, Ontario, Canada.

Pursuant to this, David's Bridal imports dresses, formal wear, and accessories from suppliers located in the United States. These suppliers in some instances have their own supply chains, including overseas.

David's Bridal also sells goods in Canada, which are primarily sold through their brick-and-mortar stores.

Policies and Due Diligence Processes

David's Bridal maintains general due diligence processes that promote responsible, ethical and legal procurement practices, including with respect to labour practices within the supply chain. These include the following:

- (a) David's Bridal suppliers are subject to its Vendor Compliance Code of Conduct ("**VCC**"). The VCC requires that all suppliers operate in full compliance with all applicable local and national laws, rules and regulations pertaining to all aspects of factory operations in the jurisdiction in which they conduct business. Additionally, vendors must comply with all applicable laws, rules, regulations, standards, and guidelines, in the jurisdictions in which David's Bridal operates. The VCC further:
 - i. States that David's Bridal will only do business with suppliers whose workers are treated fairly, who in all cases work voluntarily, and workers are not put at risk of physical harm.
 - ii. Prohibits the use of child labour. It further requires suppliers to observe all legal requirements that address the work of authorized minors, particularly those relating to hours of work, wages, minimum education, and working conditions.
 - iii. Prohibits suppliers from using or permitting the use of bonded labour, indentured labour, prison labour, or forced labour in the manufacture or finishing of products ordered by David's Bridal or otherwise in connection with the performance of the supplier's obligations to David's Bridal. Additionally, David's Bridal will not knowingly purchase materials from

vendors utilizing bonded labour, indentured labour, prison labour or forced labour.

- iv. Enables David's Bridal to take measures to monitor suppliers for compliance with the VCC including pre-screening vendors, scheduled or random, announced and unannounced on-site inspections of factories by David's Bridal representatives, or certification by suppliers that they are complying with the provisions of the VCC.
- (b) David's Bridal suppliers are also subject to its Vendor Compliance Manual "**VCM**". The VCM requires that suppliers maintain internal accountability standards and procedures, and to demonstrate compliance with the VCC. Suppliers who cannot provide proof of compliance, when requested, or are found to be in violation of the VCC will be required to take corrective action or face a termination of the business relationship. The VCM also enables David's Bridal to conduct unannounced vendor audits to evaluate compliance with the VCC.
- (c) David's Bridal's Code of Conduct for its employees "**CC**" outlines proper procurement conduct that employees are expected to adhere to. The CC states that David's Bridal will not knowingly use suppliers who violate laws or regulations or use forced labour or child labour.
- (d) David's Bridal's standard purchase agreement ("**SPA**") contains terms and conditions whereby the supplier must warrant that performance under the SPA does not violate any applicable federal, state, local, industry and foreign statutes, laws, rules, regulations, orders, standards and guidelines. Further:
 - i. any breach of the VCC or VCM would be deemed a material breach under the SPA.
 - ii. the SPA requires suppliers to conduct regular audits, through an independent inspection agency, at the facilities utilized by the supplier or its subcontractors in connection with the manufacture of products supplied to David's Bridal. If the audit report revealed a material violation of any applicable law or the SCC, the supplier is required to remediate the violations and conduct further compliance audits to ensure proper remediation of the violation.
- (e) David's Bridal maintains employee policies that prescribe duties, responsibilities, and expectations of employment. This includes workplace policies and procedures to operate in compliance with provincial employment standards, human rights, and occupational health and safety legislation.
- (f) David's Bridal maintains a hotline where workers may contact through phone call or online portal, to report on an incident that may be inconsistent with David's Bridal's employee handbook or CC.

Steps Taken in Prior Financial Year

The above due diligence processes and policies were in place in the prior financial year. David's Bridal did not take other additional steps specific to forced and child labour in 2023.

Forced Labour and Child Labour Risks

David's Bridal is currently in the process of identifying risks related to forced labour and child labour and was not aware of any risk during the 2023 financial reporting year. It is aware that there may be higher risks associated with certain regions, goods, and industries.

Remediation Measures

David's Bridal has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

Remediation of Loss of Income

David's Bridal has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any income remediation measures.

Training Provided to Employees

David's Bridal provides employee training as part of its onboarding process, including related to anti-corruption and anti-bribery. It does not provide training specific to forced and child labour but will in the future assess what training may be appropriate.

Effectiveness Assessment

The SPA requires that the supplier regularly conduct audits through an independent inspection agency, to help assess whether facilities used in the manufacturing of David Bridal's products comply with the David's Bridal SCC. The outcome of these audits helps David's Bridal monitor its efforts to prevent forced and child labour in its supply chain.

Approval and Attestation

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.

IN WITNESS WHEREOF the authorized signing officer(s) of David's Bridal Canada Inc. have executed this report as of the effective date of the signature set out below.

SIGNED

5/31/24
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DAVID'S BRIDAL CANADA INC.

Per: 
Name: Scott Richter
Title: VP Controller

I have authority to bind David's Bridal Canada Inc.