

Havi Global Solutions (Canada) LP

2023 Financial Reporting Year

Business Number: 137892972

Single Entity – Partnership

Original Date Submitted: 5/13/2024

Forced Labor in Canada Supply Chain Act - Report

Canadian Office Location:
Havi Global Solutions Canada LP
1 Concord Gate, Suite 303
Don Mills ON M3C 3N6



Entity Categorizations:

We import goods into Canada that are produced from various contracted factories located around the world (China, Vietnam, USA, France, etc.). The Canadian office is essentially a sales office, and no product is stored or sold from that facility.

- **Entity structure:**
 - Producing goods outside of Canada
 - Importing goods into Canada that were produced outside of Canada
 - Selling goods inside & outside of Canada
 - Distributing goods inside & outside of Canada
- **Canadian business presence:**
 - Has a place of business in Canada
 - Does business in Canada
 - Has assets in Canada
- **Size-related reporting thresholds:**
 - Has at least \$20 million in assets for at least one of its two most recent financial years
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years
- **Applicable laws in other jurisdictions:**
 - The United Kingdom's Modern Slavery Act 2015
 - California's Transparency in Supply Chains Act
 - USA's Uyghur Forced Labor Prevention Act 2021
- **Sectors/Industries operating in:**
 - Manufacturing
 - Retail Trade
 - Accommodation & Food Services
- **Entity's principal location:**
 - USA

Forced Labor/Child Labor Prevention:

We implement Supplier Workplace Accountability/Codes of Conduct to all our partners via an annual audit process. These annual accountability steps include but are not limited to:

1. Mapping activities & supply chains
2. Conducting internal assessments of risks of forced labor and/or child labor in the organization's activities and supply chains
3. Contracting an external assessment of risks of forced labor and/or child labor in the organization's activities and supply chains
4. Developing and implementing an action plan for addressing forced labor and/or child labor
5. Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
6. Addressing practices in the organization's activities and supply chains that increase the risk of forced labor and/or child labor
7. Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labor and/or child labor in the organization's activities and supply chains
8. Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labor
9. Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labor and/or child labor in their activities and supply chains
10. Developing and implementing child protection policies and processes
11. Developing and implementing anti-forced labor/child labor contractual clauses
12. Developing and implementing anti-forced labor/child labor standards, codes of conduct and/or compliance checklists
13. Auditing & monitoring suppliers
14. Developing and implementing grievance mechanisms

15. Developing and implementing training and awareness materials on forced labor/child labor
16. Developing and implementing procedures to track performance in addressing forced labor/child labor
17. Engaging with supply chain partners on the issue of addressing forced labor and/or child labor
18. Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labor and/or child labor
19. Engaging directly with workers and families potentially affected by forced labor and/or child labor to assess and address risks

Further Details of Due Diligence:

We have an internal SWA team that regularly visits our Asia Pacific factories and that will also undertake an annual SWA audit of the facilities, which includes a forced labor component. For any factories that our internal team cannot visit in person, we engage a locally based third party audit firm to visit. Our internal SWA team holds an annual SWA supplier conference to share best practices and review case studies, this is in addition to compulsory training that suppliers are periodically required to attend. We have also provided basic SWA training to our Quality & Safety team that are on site at facilities or which visit factories to be aware of issues and report to them. All our primary factories are required to have an SWA team in place on site. A supplier's adherence to and compliance with SWA is measured as a KPI in their annual performance assessment.

In addition to the internal team audit, there is also an external audit required by clients which is undertaken by accredited third party audit firms (for example: Ethical Supply Chain Program).

We have two forms of whistleblowing available to factory employees, one goes direct to tms and the other goes direct to the Ethical Supply Chain org. Posters with details are put up on visible areas around the factories.

Assessing Effectiveness of Due Diligence:

1. Regularly reviewing or auditing the organization's policies and procedures related to forced labor and child labor
2. Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labor/child labor clauses
3. Partnering with an external organization to conduct an independent review or audit of the organization's actions
4. Working with suppliers to measure the effectiveness of their actions to address forced labor and child labor, including by tracking relevant performance indicators

We have identified risks to the best of our knowledge, & will continue to strive to identify any emerging risks, but we have not identified any instances of forced labor/child labor in our supply chain.

SIGNED 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 or entities 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.

A handwritten signature in blue ink, appearing to read "Andre Flouret", is written over a horizontal line.

**Andre Flouret, Director, Global Trade Management
Havi Global Solutions (Canada) LP**