

**2023 Annual Report under the Fighting Against the Forced Labour and Child Labour in Supply Chains Act (the “Act”)**

**Company Name: Ice River Springs Water Co. Inc. (“IRS”)**

**Head Office: 485387 30 Sideroad, Shelburne, Ontario, L9V 3N5**

**Reporting Period: January 1, 2023 to December 31, 2023**

**Introduction**

Forced labour and child labour are contrary to our purpose, vision and values. We do not tolerate forced labour and child labour in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect our directors, officers and employees to act with integrity and to comply at all times with the letter and spirit of all applicable laws, regulations and rules. This annual report outlines the policies and procedures we have in place and the steps taken to reduce the risk that forced labour and child labour is used at any step of the production of goods in Canada.

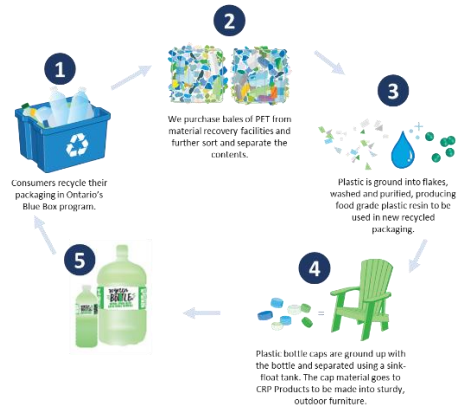
**Structure, Activities and Supply Chains**

- **Structure:** IRS is a company incorporated under Ontario’s *Business Corporations Act, 1990* (OBCA) that produces bottled water. IRS owns and operates its own recycling facility and uses 100% recycled PET plastic to manufacture its bottles. As of December 31, 2023, IRS employs almost 450 team members across Canada.
- **Activities:** IRS owns and operates six water bottling facilities, a recycling plant and an extrusion plant all located in Canada (5 in Ontario, 1 in Quebec, 1 in Alberta, 1 in British Columbia).
- **Supply Chains:** IRS sources its raw materials from suppliers in Canada and the United States, including PET bales recovered from curbside collection and deposit-and-return systems which it transforms into food grade recycled PET (rPET) resin for use in new packaging.

**Policies and due diligence processes**

IRS has a corporate employee policy in place regarding involuntary labor. This policy’s stated objective is to *“find practical, meaningful and appropriate responses to support the prevention and effective elimination of child labour and forced labour practices, in accordance with the principles set forth by the International Labour Organization (ILO) and by the Canada Labor Code and similar legislations in force in each of the provinces of Canada”*.

While this policy is focused on employment practices, IRS’s vertically-integrated and circular economy model (see illustration below) causes IRS to prioritize local suppliers of products and services in countries with strong and enforceable child/forced labour laws.



### Forced Labour and Child Labour Risks

IRS's suppliers of products and services are based out of Canada and the United States which have stringent laws and regulations against child/forced labour. However, if there was a shortage of available supply of products and services from suppliers in Canada and the United States, IRS may have to source such products and services from suppliers located in other countries with less stringent standards around forced/child labour. If this were the case, IRS would require these suppliers to go through a rigorous vetting process to ensure they do not engage in child/forced labour practices.

### Steps to Prevent and Reduce Risks

IRS has conducted an internal assessment of the risks of child/forced labour in its activities and supply chains and has not uncovered any instances of child/forced labour.

### Remediation Measures and Remediation of Loss of Income

IRS has not uncovered any instances of child/forced labour within its supply chain. Therefore, no measures have been implemented to rectify such practices or to compensate vulnerable families whose incomes may have been impacted by such practices.

### Training

As part of IRS's new hire orientation program, employees are required to complete an online training program developed by the Ontario Ministry of Labour, Immigration, Training and Skills Development. This program entitled "*Worker Health and Safety Awareness Workbook*" provides training on various aspects of occupational health and safety risks, including information and resources related to labour trafficking.

### Assessing Effectiveness

IRS's vertically-integrated and circular economy business model ensures a localized supply chain within jurisdictions that have robust and enforceable child/forced labour laws and regulations. IRS's management regularly assesses its supply chain to ensure it remains local and therefore limited to countries with strong and enforceable laws regarding child/forced labour.

### 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.

DocuSigned by:  
  
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Name: Alexandra Gott

Title: Executive Vice President and Director

Date: May 28, 2024

I have the authority to bind Ice River Springs Water Co. Inc.