Infinite Commerce, Inc.

Modern Slavery Act Report

(Fiscal Year 2023)

1. Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") requires that certain businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a report for Infinite Commerce, Inc. ("I.C." or the "Company). This report refers to the 2023 fiscal year end, being December 31, 2023 for the Company.

The Company's mission is to spread joy to families everywhere by developing top-tier brands and high-quality products. Advancing social equity is important to our business and we are committed to doing this both in Canada and abroad, in alignment with the Universal Declaration of Human Rights. As a growing business, we recognize our responsibility to respect and protect the human rights of all people who support and intersect with our business, comprised of colleagues and employees in our facilities and workers, affiliated and unaffiliated, in our supply chain network. Our customers trust the products we sell in our stores come from suppliers that provide safe, fair, and ethical working conditions for workers.

The Company's commitment to prevent and reduce the risk of forced and child labour applies to our network of facilities nationwide, our business partners and our worldwide supply chain network. We expect our business partners and suppliers (including their contractors, agents, subcontracts, sub-agents, and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws. As the Company continues to grow, we are engaged in enhancing our efforts in furtherance of that commitment and those expectations.

2. Steps taken to prevent and reduce the risk of forced labour and child labour

With the assistance of Dickinson Wright LLP, an international law firm, a human rights assessment was created, and the Company conducted that human rights assessment over its supply chain. In 2024, the Company intends to commence annual trainings for relevant employees; to launch a supplier code of conduct to uphold human rights within our organizational network and across our supply chains; and to emphasize as part of its corporate governance principles, that the business and its operations seek to uphold human rights, and address risks associated with forced labor and/or child labor.

3. Structure, Activities, and Supply Chains

I.C. is a privately held e-commerce company that develops and/or acquires products and brands, has its products manufactured by third party suppliers, and then sells those products in various different countries.

4. Policies and Due Diligence Processes in relation to Forced Labour and/or Child Labour

I.C. does not hire or engage individuals as employees or as independent contractors who are unable to provide valid identification establishing that they are over 18 years of age. All I.C. employees and independent contractors voluntarily apply for such positions. As to its supply chain, I.C. has audited its suppliers' factories in the past and will audit those factories again in the future. Further, I.C.'s suppliers provided written responses to human rights assessment regarding what their factories do to reduce or mitigate the risk of forced labour and/or child labour. The suppliers' responses included not hiring anyone who does not have valid identification establishing that they are of legal working age and status, ensuring fair wages, conducting regular trainings and audits, and maintaining certifications to demonstrate commitment to ethical labour practices (e.g., BSCI and SA8000). Suppliers also represented that they audit their potential suppliers for the same purposes.

5. Risks of Forced Labour and/or Child Labour being Used and Steps Addressing Risk

Some of I.C.'s suppliers obtain raw materials from other suppliers that are unaffiliated with and unknown to I.C. Those raw materials suppliers may pose a risk because of their indirect connection with I.C. and the I.C.'s resulting limited visibility. While it is not possible for I.C. to know with certainty that these supply chains have no risk of forced or child labour, I.C. believes that risk can be mitigated or reduced by with certain measures, including, but not limited to the following: I.C.'s employees have audited in the past, and will continue to audit into the future, its suppliers' factories; by requiring its suppliers to answer an annual human rights questionnaire which includes questions about what suppliers have done and what suppliers will do to reduce the risk of forced and/or child labour; by requiring its suppliers to comply with a supplier code of conduct; and by training relevant employees of I.C. To that end, I.C. intends to deliver employee training, enact a supplier code of conduct, and publish statements aimed at upholding human rights and reducing the risk of forced or child labor.

6. Measures Taken to Remediate any Forced Labour or Child Labour

To date, there have been no identified or reported instances of forced or child labour.

7. Measures Taken to Remediate Loss of Income to Vulnerable Families

To date, there have been no identified or reported instances of loss of income to vulnerable families.

8. Training Provided to Employees on Forced Labour and/or Child Labour

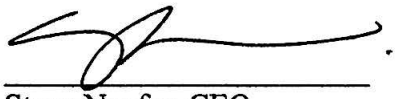
I.C. intends to deliver employee trainings including on its forthcoming supplier code of conduct and public statements aimed to uphold human rights and reduce the risk of forced labor or child labour.

9. Assessing Effectiveness of Remediation Measures

No actions have been taken to address effectiveness in preventing and reducing risks of forced labour and/or child labour in our activities and supply chains.

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 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.



Steve Neufer, CEO
Date: 9·13·2024
I have the authority to bind Infinite Commerce, Inc.