



## **Forced Labour and Child Labour in Supply Chains Report**

### **Fiscal Year 2023**

#### **1. ABOUT THIS REPORT**

This joint report is made in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the reporting period of January 1, 2023, to December 31, 2023. Trévi Investments Inc. (the "**Trévi Investments**") has prepared this report in conjunction with its wholly owned subsidiaries Trévi Manufacturing Inc. ("**Trévi Manufacturing**"), Magasins Trévi Inc. ("**Magasins Trévi**") and Lacus Innovations Inc. ("**Lacus**").

In this report, any reference to "Trévi", "Company", "we", "our" and similar terms are to Trévi Investments Inc. and its subsidiaries generally, to one or more of them, or to those who work for them.

#### **2. OUR COMMITMENT**

At Trévi, operating our business ethically with clear values that reflect our priorities is paramount to helping ensure we are a responsible employer and partner. While we always put safety first, our core values of integrity, respect and cooperation guide the conduct of each member of the Trévi team, our officers, and our directors. In equal measure, we pursue business partners who understand our core values and recognize their significance to who we are and what we stand for.

Forced labour and child labour are ongoing concerns globally, and we are committed to being proactive and playing an important role in preventing and mitigating human rights risks in our business and supply chain.

#### **3. PREVENTING AND REDUCING RISKS OF FORCED LABOUR AND CHILD LABOUR**

During our financial year ending December 31, 2023, we have made efforts to prevent and mitigate the risks of forced labour and child labour by reaching out to the majority of our suppliers outside of Canada to initiate a dialogue and gather information on their policies and measures in addressing these issues. This proactive approach allowed us to engage with our suppliers to promote responsible and ethical practices throughout our supply chain and to have better visibility on our value chain.

Trévi is committed to fostering a collective approach where each partner plays a crucial role in ensuring compliance and upholding ethical standards. To that end, we encourage all employees and business partners to adopt an exemplary professional attitude that reaches above and beyond simply abiding by laws, rules and common courtesy, and that integrates best practices relative to safety, health and environmental responsibility.

#### **4. ABOUT US & OUR SUPPLY CHAIN**

Founded in 1972, Trévi specializes in manufacturing and distributing a wide variety of residential and commercial pools, spas, and related accessories. Our extensive product line includes inground and aboveground pools, hot tubs, saunas, and various accessories like outdoor furniture, covers, liners, and chemicals. In addition to our product offerings, Trévi provides a comprehensive range of services such as installation, maintenance, repair, water analysis, and training and support.

Trévi's head office and production facilities are strategically located in Mirabel, Quebec. With a strong commitment to quality control, we oversee every aspect of the manufacturing process, from design and sales to installation. Emphasizing the significance of local production, all of our final products are made entirely in Quebec, Canada.

With retail locations in Greater Montreal, Gatineau and Quebec city, Trévi relies on a national and international distribution network to serve the residential and institutional segments of its North American and European markets. Our network of authorized dealers and distributors ensures widespread availability and customer support for our products across various regions.

Trévi Investments' subsidiaries Trévi Manufacturing and Magasins Trévi collaborate under the Trévi brand, respectively specializing in the manufacturing and sales of our products. Magasins Trévi holds a group of 10 superstores, 13 retailers, and 5 distribution centers, primarily located in Quebec. Trévi Manufacturing holds a factory that manufactures pool structures and covers and distributes its products under several trademarks, including Cornelius, Citadel, Taïga Zone, Trévi, and Ocean.

Lacus, a Trévi Investments' subsidiary, was founded in 2021 and stands out for its expertise in plastic injection molding and spa manufacturing. Lacus' manufacturing facility is located in Lachute (Quebec) and distributes its products across the various salespoints within the Magasins Trévi network as well as with other distributors.

Each subsidiary has its own supply chain tailored to its specific needs and activities, with direct suppliers located in various regions, including the following:

- Trévi Manufacturing: France, United States, Mexico, India, and China.
- Magasins Trévi: Canada, United States, Greece, New Zealand, and China.
- Lacus: United States, New Zealand, and China.

Our direct suppliers also have their own supply chains which may extend to other overseas countries, including the United States and China. In some cases, there may be many levels of suppliers between us and the initial source of raw materials. Consequently, it is crucial for both Trévi and our suppliers to assume responsibility for upholding and adhering to human rights obligations.

#### **5. POLICIES AND DUE DILIGENCE PROCESSES**

At Trévi, we believe in equality in employment matters. We are committed to providing a fair, equitable and respectful workplace where all are supported, valued and respected. As such, we have a zero-tolerance policy towards any violation of human rights in our operations and supply

chain, and each of Magasins Trévi, Trévi Fabrication and Lacus have adopted guidelines and policies to ensure the respect of our employees' rights and strive to embed responsible and ethical business conduct into our practices.

### **Our Policies**

Magasins Trévi has implemented a comprehensive Code of Ethics and Conduct that outlines its commitment to fostering equitable relationships with its personnel and cultivating a healthy work climate. The code emphasizes the importance of conducting oneself with respect and dignity while promoting a safe and secure work environment. It also establishes a clear duty for employees to report any violations of the code and provides them with guidance on the appropriate procedures to follow in such instances. By adopting this code, Magasins Trévi seeks to create a workplace culture that prioritizes ethical behavior and upholds the values of integrity and accountability.

Trévi Manufacturing has established an Employee Handbook that presents the benefits to which each employee is entitled, all with the objective of promoting equity and transparency. Additionally, it provides guidelines on the safety measures that must be adhered to in order to foster the protection and well-being of our employees.

Lacus has implemented a Code of Conduct that places particular emphasis on respecting its employees and that highlights the importance of creating a respectful, open, and collaborative work environment. This Code of Conduct includes a reporting policy encouraging our employees to report any instances of unwanted behavior. Lacus has also implemented an Employee Handbook which is provided to all new employees to inform them about the benefits they are entitled to. In order to continuously improve its practices for protecting its workers, Lacus has established a Health and Safety Committee that holds quarterly meetings.

### **Our Suppliers' Policies and Our Due Diligence Process**

During our last financial year, we proactively engaged with the majority of our direct suppliers located outside Canada to address any human rights risks. We initiated discussions with these suppliers to promote awareness, foster dialogue, and develop strategies to ensure the absence of any form of forced labour or child labour in their supply chains. To this end, we have queried our direct suppliers to confirm whether they have implemented policies aimed at combating forced labour and child labour and required copies of such policies.

In response to our inquiries, several of our suppliers have confirmed that they have adopted policies that provide for the respect for human rights and the prohibition of any form of modern slavery and/or provided us with copies of such policies. Among the policies and practices that were identified as being implemented were fair employment agreements, policies for corporate and employee ethics, corporate policies prohibiting the work of children, training policies and working conditions policies. Additionally, some of our suppliers have also certified that they do not engage in the use of forced labour or child labour in their operations.

By conducting inquiries with our suppliers, we aimed to ascertain and mitigate any risks of forced labour and child labour in our supply chain. We cannot, however, provide any guarantees that the answers we receive to our questions or confirmations are true and complete.

In addition, the vast majority of our subsidiaries conduct on-site visits annually within certain of our business segments to promote transparency with our business partners and gain a better understanding of the nature of their activities. These visits are conducted either prior to

establishing any new business relationship with a direct foreign supplier or during the business relationship. Our goal is to implement these practices gradually across all business segments of the Company.

Furthermore, given that combating forced labour and child labour is an ongoing concern that merits continuous efforts and progress, we intend to review our policies and practices in the near future to adopt a supplier code of conduct that will specifically address this concern.

## **6. RISK ASSESSMENT & REMEDIATION MEASURES**

Trévi has started a formal risk assessment process and acknowledges that the risk of forced labour and child labour in the industry exists, given that supply chains, including those of suppliers, extends into regions potentially facing greater risk of forced labour and child labour. However, we are in the early stages of our process and there are still areas where our evaluation needs further improvement.

### **In Trévi's Operations**

We consider the risk of forced labour or child labour occurring within our operations to be low for the following reasons:

- All operational and office staff are hired in accordance with the laws and regulations in force in the local jurisdiction.
- We ensure that all our employees benefit at least from the advantages and rights provided for by laws and regulations in force in the local jurisdiction.
- All our employees have the freedom to join a trade union or other association.
- We ensure compliance with our policies to create a work environment that is respectful, secure, and promotes employee well-being.

### **In Trévi's Supply Chain**

The risk of forced labour and child labour in our supply chain mainly resides in the fact that we purchase a broad range of goods from international suppliers, some of which are located in regions where the risk of human rights abuses is higher, especially in the manufacturing sector.

The risks we have identified through our preliminary assessment are mainly related to the industry in which we operate, our direct suppliers, the type of goods produced and the location of our suppliers manufacturing facilities.

The risks identified may be subject to change as we intend to continue analyzing forced and child labour risks in our supply chains in 2024 and beyond.

At this time, Trévi has not identified instances of forced labour or child labour in its activities or supply chains. As such, no remediation measures have been undertaken to date. We recognize that efforts to prevent and reduce the risks of forced labour and child labour can have the unintended consequence of contributing to a loss of income for the most vulnerable families. Trévi is not aware of any instance to date where its efforts to mitigate the risk of forced or child labour

in its activities and supply chains may have contributed to a loss of income for vulnerable families. Nevertheless, we must remain vigilant.

## **7. TRAINING AND CAPABILITY BUILDING**

During the reporting period, Trévi did not provide employee training with regards to human rights issues but is committed to acting ethically and with integrity in all business relationships, which represent core values of the organization. To this end, Trévi intends to provide comprehensive training to its procurement team on the critical matters of forced labour and child labour. By equipping the procurement team with the necessary knowledge and tools, Trévi strives to uphold its commitment to ethical sourcing and responsible business practices.

## **8. ASSESSING THE EFFECTIVENESS OF OUR APPROACH**

Although we have yet to establish internal processes to assess the effectiveness of the measures taken to ensure that forced labour and child labour are not being used in our business and supply chains, we are committed to preventing and fighting all forms of modern slavery and human trafficking in our activities and supply chains. As such, we will continue to periodically review our processes, practices and policies in order to identify opportunities for improvement.

## **9. APPROVAL AND ATTESTATION**

This report was approved by the Board of Directors of Trévi Investments Inc. on May 16, 2024, pursuant to paragraph 11 (b)(ii) of the Act and constitutes our group's report for the financial year ending December 31, 2023.

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 entities listed at the first section of this report. 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 indicated above.

I have the authority to bind Trévi Investments Inc.



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Full name: Mr. Clément Hudon  
Title: President of Trévi Investments Inc  
Date: May 16, 2024