

1. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (more commonly known as the *Modern Slavery Act*, hereinafter the “**Act**”) requires affected entities to file a report on or before May 31 of each year, outlining all efforts during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step within its business and supply chain activities.

JAMP Pharma Corporation (“**JAMP**”) is committed to playing its part in the fight against modern slavery. We believe that concrete steps must be taken to eradicate this reprehensible practice and ensure that human rights are respected throughout our business operations and supply chains. We uphold a zero-tolerance policy towards child labour, forced labour and any other form of slavery and we expect our suppliers to share this commitment to ethical and responsible business practices.

This report (“**Report**”) has been prepared to comply with Section 11 of the Act and outlines the actions we have taken during the year ended March 31, 2024 to reduce the risk of forced labour or child labour occurring in our business.

2. JAMP’s corporate structure, business operations and supply chains

(a) *Corporate structure and business operations*

JAMP is incorporated under the *Canada Business Corporations Act*. Headquartered in Boucherville, JAMP specializes in the development, distribution and marketing of pharmaceutical products in Canada, with a portfolio of hundreds of molecules in various segments of the pharmaceutical industry. In addition to its generic division, JAMP has two other divisions, BioJAMP[°] and Wampole[°], who offer biosimilar, natural health and over-the-counter products.

Having experienced exceptional growth over the past decade, JAMP is one of the industry leaders in terms of annual prescription volume in Canada¹. With over 130 new products authorized for sale by Health Canada in the past three years, JAMP is ranked as the Canadian leader in product launches², constantly striving to offer new treatment options for Canadians, including many specialty drugs.

(b) *Supply chains*

JAMP’s supply chains typically include sourcing raw materials (such as active pharmaceutical ingredients), manufacturing pharmaceutical products, implementing quality control measures, distributing products to wholesalers and pharmacies, and ensuring regulatory compliance throughout the process. This involves working with several suppliers and manufacturers worldwide, as well as regulatory authorities to ensure that we maintain a safe and reliable supply of medications to consumers across Canada. The products purchased by JAMP are then distributed mainly in Canada as well as in a select number of international markets.

3. JAMP’s policies and due diligence processes in relation to forced labour and child labour

(a) *Policies in relation to forced labour and child labour*

JAMP maintains policies and due diligence processes in its efforts to fight against forced labour and child labour. At every stage of our operations, from development to manufacturing and distribution, we adhere to

¹ Based on internal data.

² *Idem*.

standards designed to uphold ethical integrity, including without limitation, to reduce the risk of forced and child labour.

JAMP's policies include, without limitation:

- (i) the implementation of a code of conduct for suppliers to adhere to; and
- (ii) the implementation of a health and safety policy at work.

(b) Due diligence processes in relation to forced labour and child labour

JAMP's conducts due diligence with suppliers that it considers to be high risk. Our due diligence processes may include, without limitation:

- (i) the use of supplier questionnaires;
- (ii) the implementation of supplier scorecards;
- (iii) screening and onboarding tools;
- (iv) third party risk assessments;
- (v) conducting social audits; and
- (vi) maintaining a list of approved suppliers.

As a pharmaceutical company committed to excellence, we favour partnerships with industry leaders recognized for their adherence to best practices and commendable credibility. We have put in place a rigorous selection process aimed at identifying partners who are not only well-established within the industry but who also have a proven track record of integrity and quality. By partnering with organizations that share our values and commitment to excellence, we strive to ensure that our operations meet the highest standards of ethics and integrity.

JAMP is also in the process of furthering its contribution to the fight against forced and child labour, by implementing specific forced labour or child labour policies or diligence processes, in the short-term.

4. Risk of the presence of forced labour and child labour

(a) Parts of JAMP's Business and Supply Chains that carry a risk of forced labour and child labour

Partnering with companies abroad presents potential risks and challenges for JAMP to ensure that high ethical standards are maintained. These risks include differences in laws and regulations, enforcement practices and divergences in ethical standards. In addition, cultural and language barriers, geopolitical instability and supply chain disruptions can exacerbate these risks.

Despite the risks inherent in doing business with partners around the world, we approach partner selection with care and attention. Through our assessment process, we strive to identify partners who demonstrate a commitment to compliance and ethical conduct. By emphasizing prudent decision-making and proactive risk mitigation efforts, we aim to foster lasting relationships based on trust, integrity and shared success across the globe.

(b) Steps JAMP has taken to assess and manage the risk

To meet these challenges, we implement due diligence processes to assess the compliance, reputation and capabilities of potential partners. By proactively managing these risks, we aim to foster successful and

sustainable partnerships that safeguard the integrity of our products and protect the interests of Canadian consumers.

JAMP works toward reducing these risks by:

- *screening and evaluating current and potential suppliers;*
- *incorporation of modern slavery provisions in supplier contracts or supplier codes of conduct; and*
- *engaging with supply chain partners on the issue of addressing forced labour and/or child labour.*

5. Measures Taken to Remediate Forced or Child Labour

While JAMP has not identified any instances of forced and child labour in its supply chains and has therefore not taken any specific remediation measures, we understand the importance of proactive measures to ensure our continued success and resilience. As part of our commitment to excellence, we diligently implement measures to reduce risk of forced and child labour, drawing on comprehensive risk assessments and industry best practices.

By anticipating potential challenges, we strengthen our operational framework, increasing confidence with our partners and ensuring that we are prepared to deal with risk if it does arise. By assessing and monitoring the conduct of our partners, we not only mitigate potential threats, but also position ourselves for sustainable growth and adaptability in an evolving landscape.

6. Employee Training

JAMP is currently in the process of furthering its contribution to the fight against forced and child labour by implementing specific forced labour or child labour training to all of its employees in the short-term.

7. Measuring effectiveness

As part of its commitment to excellence, JAMP recognizes the importance of continuous improvement and strategic direction. JAMP takes a multi-faceted approach to measuring the effectiveness of the measures it has put in place and continues to put in place to prevent and reduce the risk of forced and child labour. An important example of this assessment is the implementation of a “scorecard” evaluation process for our suppliers. To this end, this year JAMP set up a new Supply Excellence Department, whose objective is, among other things, to evaluate the performance of our suppliers. We endeavour to assess at various times whether what we are putting in place is working, by checking with the relevant departments in our company, asking whether there have been any incidents or risks identified, and whether we need to reassess the measures put in place. This enables us to check whether the measures currently in place are sufficient, and to identify opportunities for improvement.

8. Board approval

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of JAMP.

In my capacity as President and Secretary of JAMP Pharma Corporation, and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

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



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*For the year ended
March 31, 2024.*

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.

I have authority to bind JAMP Pharma Corporation.

A handwritten signature in blue ink, appearing to read "Louis Pilon", written over a horizontal line.

Louis Pilon
President and Chief Executive Officer

May 29, 2024