

Modern Day Slavery Report

Jamieson Wellness Inc.

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Toronto, Ontario, Canada M5C 2V9
jamiesonwellness.com

Reporting Period: January 1, 2023, through December 31st, 2023

Reporting requirements under supply chain legislation in another jurisdiction:

- The United Kingdom's *Modern Slavery Act 2015*
- Australia's *Modern Slavery Act 2018*
- California's *Transparency in Supply Chains Act*

Applicable categorizations:

- Listed on a stock exchange in Canada.
- Canadian business presence:
 - Has a place of business in Canada
 - Does business in Canada
 - Has assets in Canada
- Meets size-related threshold:
 - 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.
 - Employs an average of at least 250 employees for at least one of its two most recent financial years.

Applicable sectors/industries:

- Manufacturing
- Consumer package goods

Entity's Activities:

- Producing goods (including manufacturing, extracting, growing, and processing)
 - in Canada
 - outside Canada
- Selling goods
 - in Canada
 - outside Canada
- Distributing goods
 - in Canada
 - outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing, selling, or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada.

Our Value Chain:



PURPOSE:

At Jamieson Wellness, our vision is to improve the world's health and wellness. For more than a century, we have been fortunate to manufacture and sell products that have a positive impact on the health and wellbeing of our consumers. However, our definition of wellness also includes that of our communities and the environment in which we operate.

As our global reach expands and we look to create sustainable growth for the next 100 years, we have a duty to advance our vision through the lens of sustainability, equity, and inclusion for the people we serve and the communities where we have impact. A critical step in this journey is to develop transparency around our Environmental, Social, and Governance (ESG) practices and the ESG practices of our partners and their suppliers.

With this outcome in mind, we created our Sustainable Partner Program and adjoining [Policy](#) (SPPs). Our SPPs are rooted in our values and are aligned to the 10 principles of the United Nations Global Compact, of which Jamieson Wellness is a proud signatory. We have also chosen EcoVadis, a globally recognized CSR rating company based on international standards, to conduct individual sustainability performance assessments of our supply chain partners, that specifically focuses on Human Rights in supply chain. We will require all our partners to participate in this program, and we are confident this will be a good starting point for a sustainable, long-term business relationship.

We at Jamieson Wellness must acknowledge that the impact of our products and services cannot be dissociated from the business practices of our partners, and we are jointly accountable for ESG practices throughout our entire supply chain. Our stakeholders expect us to act responsibly, and we owe this to future generations.

Governance:

Our Sustainable partner program and policy is overseen by our Governance, Compensation and Nominating Committee (GCN). The GCN reviews and monitors the program on a quarterly basis that includes a scorecard identifying process, outcomes and any risk. The GCN provides quarterly reporting to our Board of Directors on all material matters concerning the program.

The Sustainable Partner Program

1. The Policy

- Describes fundamental principles on business and human rights that we respect and follow across our business operations.
- Principles are rooted in our values and based on Ten Principles of United Nations Global Compact, world's largest corporate sustainability initiative.
- All Jamieson Wellness suppliers will sign this new policy and will be expected to uphold these principles.

2. Supplier Evaluation & Platform

- Enrollment on 3rd party risk-based management program
- Review and sign [Sustainable Partner Program Policy](#)
- Complete EcoVadis on-line assessment questionnaire



United Nations
Global Compact

ecovadis
Business Sustainability Ratings

Our Sustainable Partner Policy

All aspects of this program and associated policy are designed to support our purpose of Inspiring Better Lives Every day, and are rooted with our values of Accountability, Excellence, Respect and Agility.

As a global organization, we believe in being globally consistent along the value chain while also preserving local relevance; as such, our Sustainable Partner Principles are rooted in internationally recognized standards and are designed using a global lens.

We are a United Nations Global compact participant and endorse their principles on business and human rights. We have made a commitment to advancing sustainable and equitable access to health and wellness for all our stakeholders and where we operate.

We are committed to building resilience, responsibility and integrating a sustainable system that is fundamental for a strong foundation. We have ambitious ESG goals that will require support and alignment with our business partners to collectively realize our sustainable business ambitions.

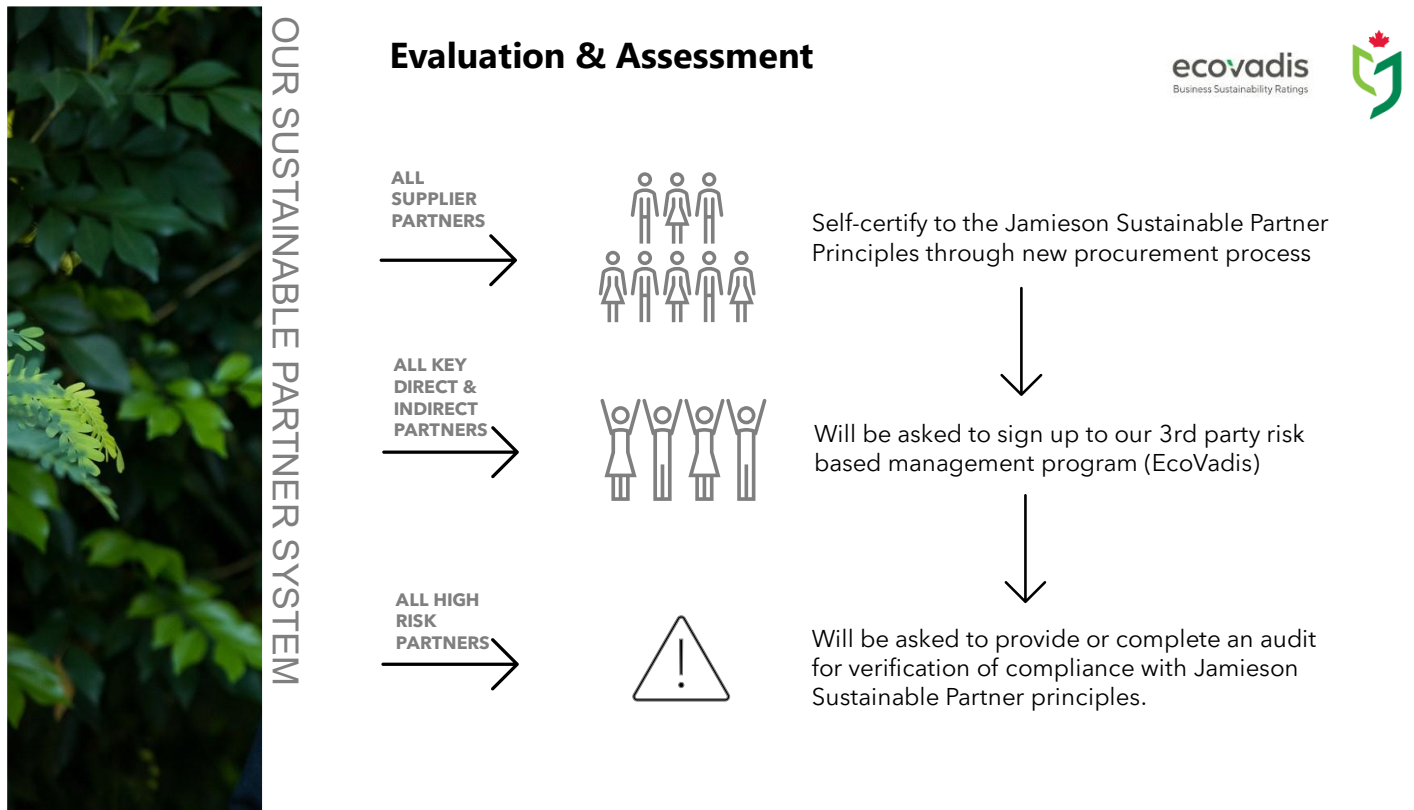
DUE DILIGENCE AND RISK ASSESMENT:

In addition to the policies and procedures discussed above, to identify, address and mitigate any actual and potential impacts on human rights, decent working conditions and modern slavery risks in our business and in our supply chains, we engage in risk assessments that use external audits and if there is non conformance with our requirements, require implementation of a corrective action plan. Our [Human rights policy](#) is rooted in internationally recognized standards and are designed using a global lens that aligns with:

- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Universal Declaration of Human Rights
- The International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

We measure the effectiveness of our efforts through an internal scorecard that tracks the number of suppliers that complete assessments, the number of audits performed, audit findings, and the implementation (if necessary) of any required corrective measures.

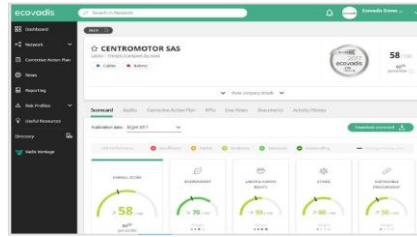
In 2023, we have 68% of our Suppliers who have signed on our SPP and 78% of our Target 1 suppliers have completed self assessments with our external auditing partner, EcoVadis. We are continuing our onboarding of our existing suppliers, and this supplier assessment program has also been integrated into our supplier qualification process for all new suppliers.



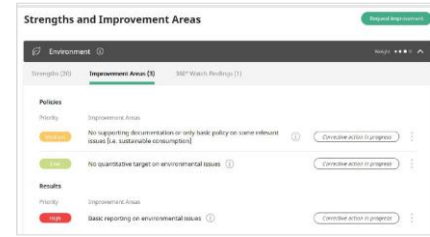


OUR SUSTAINABLE PARTNER SYSTEM

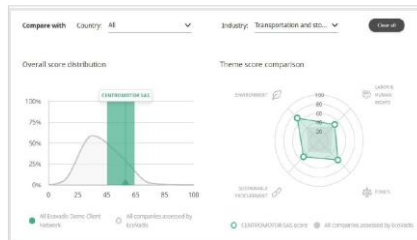
Evaluation & Assessment: the EcoVadis Platform



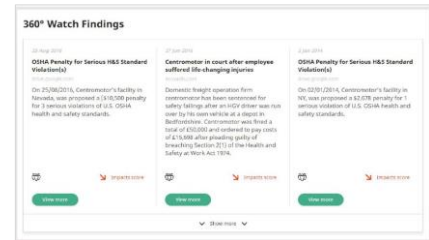
- Dashboard including scores aligning to Jamieson’s Supplier Partner Policy KPI’s



- Prioritized Corrective Actions and status updates



- Peer Benchmarking, based on industry, country & organizational size



- 360° Watch: Broad sources, including: government, agencies, compliance, databases, specialized press.



OUR SUSTAINABLE PARTNER SYSTEM

Reporting on Breaches



1. Failure to comply with the Principles of this program of which a team member or a partner is aware, should be reported immediately to the Jamieson Wellness team.
2. We live by our value of transparency and expect our partners to align with this value as well. We strive to create a psychologically safe space for our team members and our partners, therefore reports can be submitted confidentially and anonymously (where permitted by law).
3. Jamieson Wellness will investigate all concerns brought forward and will discuss findings with the supplier. We ask that the supplier assists in any such investigations and collaborate on required information needed to complete the assessment.
4. Upon review, if remediation is required, the supplier will formulate a corrective action plan and communicate to the Jamieson Wellness team. The plan is to ensure to include all corrective actions, timelines and plan to resolve the breach.

For any questions regarding our **Sustainable Partner Program**

Please contact the following address: sustainablepartners@jamiesonlabs.com

OUR SPP GUIDING PRINCIPLES

Human Rights

Our SPP Human Rights Guiding Principles communicates Jamieson’s support for the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights.

Principle 1: Partners support and respect the protection of internationally proclaimed human rights.

1.1. Freedom of Expression: Partners must recognize that everyone has a right to freedom of opinion and expression.

1.2. Health & Safety: Partners are committed to maintaining a safe, healthy, and secure work environment. Employees operate in a work environment that is free of harassment, violence, intimidation or any other unsafe behaviours or conditions. Partners identify and reduce risks to prevent accidents, illnesses, and injuries.

1.3. Drinking Water & Sanitation: Partners must provide employees with, at minimum, drinking water and sanitation within the work environment.

1.4. Wages & Working Hours: Partners must comply with all wage and working time laws, ensuring that legal restrictions on working hours, including overtime, maximum hour rules, meals, and rest periods are adhered to.

1.5. Digital Security & Privacy: Partners must respect personal data privacy and uphold digital security of their employees and consumers.

1.6. Migrant & Refugee Rights: Partners will comply with all legislation and other globally recognized forms of migration governance that are consistent under international human rights law and ensure that all migrants and refugees enjoy all their human rights and fundamental freedoms.

1.7. Indigenous Peoples' Rights: Partners will foster an enabling environment for Indigenous Peoples to advocate for and exercise their human rights in alignment with the UN Declaration on the Rights of Indigenous Peoples.

1.8. Access to Grievance Mechanisms & Remedies: Partners ensure that all employees have access to grievance mechanisms with fair procedures and remedies.

1.9. Land Rights: Partners recognize the rights and title to property and ensure that the land of individual and local communities is respected.

1.10. Diversity, Equity & Inclusion: We encourage our partners to align with our [Diversity, Equity, Inclusion & Belonging Policy](#), and our values. Jamieson believes that health and wellness is a human right; it that it is to be inclusive to serve all communities with an expectation that partners actively practice this inclusivity.

Principle 2: Partners make sure they are not complicit in human rights abuses.

Labour

Our SPP Labour Guiding Principles communicates Jamieson's support for the International Labour Organization (ILO), a UN agency for the world of work.

Principle 3: Partners should uphold the freedom of association and the effective recognition of the right to collective bargaining.

3.1. Freedom of Association: Partners recognize and respect employees' right to freely choose their representatives. Partners ensure that employee representatives do not suffer discrimination.

3.2. Collective Bargaining: Partners ensure that employees understand their right to bargain collectively.

Principle 4: Partners uphold the elimination of all forms of forced or compulsory labour.

4.1. Forced Labour: Partners do not use forced or compulsory labour, meaning any work or service performed under threat or that is not consented to by the employee. Partners align with the prohibition of forced labour as outlined under the ILO Forced Labour Convention (No.29) and the Abolition of Forced Labour Convention (No. 105).

Principle 5: Partners uphold the abolition of child labour.

5.1. Child Labour: Partners do not employ children under the age of fifteen. If the law sets a higher minimum working age, this limit applies. Partners ensure compliance under the ILO, International Labour Standards on Child Labour.

Principle 6: Partners uphold the elimination of discrimination in respect of employment and occupation.

6.1. Discrimination: Partners refuse to engage in discriminatory practices. Discrimination based on sex, gender, sexual orientation, race, ethnicity, language, religion, or belief, political or other opinion, social origin, disability, nationality, marital status, veteran status, migration or residence status, age, or any other considerations will not be tolerated. Partners are expected to have systems in place to prevent, detect, and resolve unacceptable employee harassment, discrimination, physical or mental punishment.

Environment

Our SPP Environment Guiding Principles communicates Jamieson's support for the United Nations Paris Agreement goal of limiting global temperature rise to as close as possible to 1.5°C by the end of the century.

Principle 7: Partners support a precautionary approach to environmental challenges.

7.1 Partners are compliant with all internationally recognized environmental laws and regulations.

Principle 8: Partners undertake initiatives to promote greater environmental responsibility.

8.1. Partners are expected to demonstrate alignment to our environmental commitments. Partners must actively promote environmental responsibility across their stakeholders. Jamieson defines environmental responsibility through our three environmental pillars of Climate, Circularity, and Biodiversity, spanning across our entire value chain, and in alignment with the 1.5°C pathway.

Principle 9: Partners encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Our SPP Anti-Corruption Guiding Principles communicates Jamieson's support for the United Nations Convention against Corruption (UNCAC).

Principle 10: Partners work against corruption in all its forms, including extortion and bribery.

10.1. Partners must uphold business practices with integrity and compliance with the law. Partners must develop and maintain processes & training to prevent and detect bribery.

10.2. Partners ensure that their employees do not accept gifts and hospitality that are excessive, demonstrate improper advantage or create a conflict of interest.

COMMUNICATION & EDUCATION:

Mandatory annual education on our Code of Conduct, including sign off for our Sustainable partner and Human Rights policy is required for all Jamieson Wellness team members. Jamieson also facilitates supplier education sessions that explains in detail:




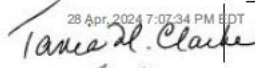
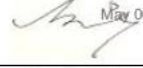

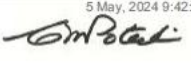

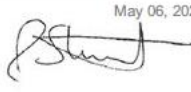
- Why Sustainable procurement matters
- Modern Day slavery stats and risks
- Our Sustainable Partner program and policy
- Responsibilities for both team members and suppliers

REPORT REVIEW, APPROVAL AND ATTESTATION:

This report was reviewed and approved by relevant senior leadership and Jamieson Wellness Board of Directors

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.

I have the authority to bind Jamieson Wellness Inc.:

Name	Title	Signature	Date
Tim Penner	Chair of The Board		
Mike Pilato	Director, President and Chief Executive Officer		
Heather Allen	Director, Chair of GCN	 May 08, 2024 2:28 PM	
Tania Clarke	Director	 28 Apr, 2024 7:07:34 PM EDT	
Mei Ye	Director	 May 06, 2024 9:41 PM	
Dr. Louis J. Aronne	Director	 May 07, 2024 11:15 PM	
Catherine Potechin	Director	 5 May, 2024 9:42:26 PM EDT	
Francois Vimard	Director		
Regan Stewart	Chief Operations and People Officer	 May 06, 2024 4:00 PM	
Shawna Ketter	Senior Director ESG & Culture	