

MINT PHARMACEUTICALS INC.
6575 DAVAND DRIVE
MISSISSAUGA, ONTARIO, CANADA L5T 2M3
TEL 905.795.9437
FAX 1.866.514.8446
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mintpharmaceuticals.com

Modern Slavery Statement for the Financial Year ended December 31st, 2023.

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by Mint Pharmaceuticals Inc. ("Mint") to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing January 1st, 2023, and ending December 31st, 2023.

At Mint Pharmaceuticals Inc., we are deeply committed to upholding human rights and ethical standards throughout our operations. We believe in treating all individuals with dignity, respect, and fairness. As part of this commitment, we are dedicated to ensuring that our supply chain remains free from forced labour and child labour & it is an important aspect of the vendor selection criteria. Our goal is to create a sustainable and responsible business environment where human rights are safeguarded, and ethical practices are paramount.

Company Structure:

Mint was established as a Corporation on January 25th, 2007. It trades under the business name Mint Pharmaceuticals Inc., Business number 823838727RC0001, with its head office at 6575 Davand Drive, Mississauga, L5T 2M3 and currently employs 75 employees. Mint employees are structured into the following departments: Operations, Scientific Affairs, Quality and Pharmacovigilance, Finance and Sales & Marketing.

Supply Chain:

Mint is a leading supplier of high-quality and affordable generic pharmaceuticals to Canadian customers. We focus on consistent supply, innovation, and exceptional customer service to deliver the highest value to our stakeholders. We manufacture & source products from our own or partner's manufacturing sites in six countries (India, China, Taiwan, USA, Spain & the UK). Products are imported using air and sea transport and are stocked either at a 60,000 sq ft specialized logistics and distribution centre or at a 3PL warehouse. Our products are sold to all major national and regional pharmacy chains as well as independent pharmacies and hospital networks.

Risks in Supply Chain:

All our partners are leading pharmaceutical companies within their respective regions & service other highly regulated markets throughout the world. They must adhere to local labour laws, and we have not come across any instances of non-compliance with these regulations. An identified supply risk is our lack of direct visibility, as international manufacturing & sourcing of our products makes it difficult for site visits to audit. We will be working closely with our suppliers to gain more insight and visibility within their labour policies and practices based on best practices adopted by our industry associations through Canadian Generic Pharmaceutical association ("CGPA").

Actions Taken:

At Mint Pharmaceuticals Inc., we are deeply committed to upholding human rights and ethical standards throughout our operations. We believe in treating all individuals with dignity, respect, and fairness. As part of this commitment, we are dedicated to ensuring that our supply chain remains free from forced and child labour.

All the contracts signed with our partners have the following contractual obligations:

" PARTNER Representations, Warranties and Covenants: PARTNER hereby represents and warrants the following to MINT with full knowledge that MINT is acting in reliance on such representations and warranties in executing this Agreement and performing its obligations hereunder:



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1. PARTNER is a corporation duly incorporated and validly existing under the laws of [Partner Country];
2. PARTNER has all requisite corporate power and authority to enter into and perform its obligations pursuant to this Agreement; “

In the recently signed agreement with the medical devices vendor, we incorporated the following contractual obligation:

“MODERN SLAVERY AND CHILD LABOUR. The company has itself formally committed to comply with, and has adopted as its own, the principles of the United Nations Global Compact Office as well as the UN Sustainable Development Goals, and respects the Guiding Principles on Business and Human Rights, and the International Labour Organisation's Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. Company commits to comply with any regulations against any form of child labour or other exploitation of children in the manufacturing and delivery of the Products. Company maintains a policy of zero tolerance against the commission of unlawful acts and fraud or corruption situations in all its forms.

In performing its obligations under the commercial relationship, Contracting Party shall and shall request to each of its officers, employees or other persons associated, including any sub-contractors, that shall: (1.) Comply with all applicable laws, statutes, regulations in force in the Territory from time to time including but not limited to the principles of the United Nations Global Compact Office, adopting as its own the UN Sustainable Development Goals, and respect the Guiding Principles on Business and Human Rights, and the International Labour Organisation's Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, including especially the rights of association and collective negotiation; (2.) Take reasonable steps to ensure that there is no modern slavery or human trafficking in the Company's; and (3.) shall maintain a policy of zero tolerance against the commission of unlawful acts and fraud or corruption situations in all its forms. Company reserves the right to terminate its relationship with the Contracting Party in the event of the Contracting Party's failure to comply with the commitments contained in this clause 16. “

We will work with CGPA to adopt the best practices determined by the leading companies in the industry and participate in any committees to provide our inputs.

Some of the potential approaches will include: Effective 2024, Mint will include education on Bill S-211 as part of the Employee Onboarding Training Program. All existing Mint employees will also undergo a training program with a Refresher provided every 2 years. We will also include the information and policy with reporting mechanisms in our employee handbook.

We are members of Canadian Generic Pharmaceutical association (“CGPA”) and Canadian Association of Pharmacy Distribution Management (“CAPDM”) which regularly conduct working sessions and industry discussions to facilitate continuous updates and enable members to incorporate and adopt the best practices and initiatives to address the risks of forced labour and child labour.

Full mission statements and ongoing initiatives can be found using the following links:

[CAPDM - Canadian Association for Pharmacy Distribution Management \(capdm.ca\)](https://www.capdm.ca)

[Home - CGPA – Canadian Generic Pharmaceutical Association \(canadiangenerics.ca\)](https://www.canadiangenerics.ca)



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Risk Assessment:

At Mint Pharmaceuticals Inc., we are deeply committed to upholding human rights and ethical standards throughout our operations. We believe in treating all individuals with dignity, respect, and fairness. We abide by the Canadian labour laws and practices.

We will work with CGPA to adopt the best practices determined by the leading companies in the industry and participate in any committees to provide our inputs.

Some of the potential approaches will include Mint developing a questionnaire to be completed by all suppliers to determine their stance, policies and practices related to Forced and Child Labor. Data obtained from the questionnaire will allow us to determine current status, risk assessment and possible remediation steps, if necessary. We will also be enhancing the scope of contractual obligation with a policy on Forced and Child Labor in Product Supply Agreements.

Additional potential approaches will include: Mint has developed a Policy statement regarding Forced and Child Labour. We are also in the process of developing Questionnaires that will be sent to all suppliers and introducing Forced Labour Policy language to agreements.

Remediation:

Identified cases of Forced and Child Labour will be dealt with immediately and comprehensively. Upon identification, we will notify Supplier's Senior Management and demand immediate corrective action. The supplier will complete a thorough investigation and provide a corrective action plan. We will work with the supplier to ensure the remediation steps are put in place and are carried out effectively. It is of the utmost importance that the corrective action steps include rehabilitation and support, potentially including remediation for loss of income, for the affected parties.

Mint will continuously monitor the supplier to ensure corrective action is implemented. If the supplier does not satisfy remediation steps, Mint will provide notice to halt the business relationship.

We will be working closely with industry groups like CGPA to incorporate and adopt the best practices in our approach and initiatives to address the risks of forced labour and child labour.

Some of the potential approaches to protect the victims will include: The corrective action plan for the identified occurrence of forced labour must include protection for the affected persons. This shall include physical and emotional rehabilitation, a plan for return to the workforce and connection to victim service providers for the affected party.

We will work with CGPA to adopt the best practices determined by the leading companies in the industry and participate in any committees to provide our inputs.

Training

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Some of the potential approaches will include: Starting in 2024, Mint will be training all employees on our Forced and Child Labour Policy. The training program shall include:

- What is forced/child labour?
- Identifying forced/child labour
- Combating forced/child labour
- Complying with forced/child labour regulations
- Remediation steps for identified cases
- Ongoing monitoring

The Policy regarding Forced and Child Labour will be reviewed on an annual basis. All Mint personnel will require refresher training every 24 months.

We will work with CGPA to adopt the best practices determined by the leading companies in the industry and participate in any committees to provide our inputs.

Effectiveness Assessment

Mint's effectiveness in ensuring that forced and child labour is not being utilized will be assessed through various KPI's. The KPI's will be generated from data obtained through actions taken with supplier and training programs. The potential list of KPI's will include:

- Number of questionnaires completed by supplier
- Percentage of questionnaire completion
- Number of confirmed to be compliant with Forced and Child Labour regulations
- Percentage of confirmed to be compliant with Forced and Child Labour regulations
- Number of Mint employees trained
- Number of forced/child labour cases identified
- Number of signed contracts containing anti-forced labour and -child labour clauses
- Percentage of signed contracts containing anti-forced labour and -child labour clauses

We will work with CGPA to adopt the best practices determined by the leading companies in the industry and participate in any committees to provide our inputs.

Sign off

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31st, 2023. It has been issued on behalf of Mint Pharmaceuticals Inc.

Signed,

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Jaiveer Singh
Chief Executive Officer
Date: 30-May-2024

