

Modern Slavery Report

Fiscal Year Ended December 31, 2023



Introduction

This document constitutes Olive Fertility Centre Inc.'s ("**Olive Fertility**", "**we**", "**us**", or "**our**") Modern Slavery Report (the "**Report**"), covering our fiscal year ended December 31, 2023.

We make this Report pursuant to sections 11(1) and 11(3) of *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Modern Slavery Act**" or the "**Act**"). We do not report under similar legislation in any other jurisdiction.

Capitalized terms used herein and not defined have the meanings given in the Act.

Philosophy

Olive Fertility established itself on the principles of good governance, integrity, and ethical stewardship, all of which require evolving practices, frequent reassessment, and continuous improvement to maintain. A component of these principles is the treatment of people, whether directly or indirectly by the suppliers retained. We recognize the multifaceted and hidden nature of forced labour, encompassing practices such as servitude, forced labour, and exploitation of vulnerable individuals, including children.

Corporate Structure

The date and jurisdiction of organization for Olive Fertility is set out below:

Entity	Jurisdiction	Amalgamation Date
Olive Fertility Centre Inc.	<i>Business Corporations Act (British Columbia)</i>	December 16, 2020

Olive Fertility has a place of business at 300-East Tower, 555 West 12th Avenue, Vancouver, British Columbia, V5Z 3X7, 545 Superior Street, Suite 210, Vancouver, British Columbia, V8V 0C5, and 801-13737 96 Avenue, Surrey, British Columbia, V3V 0C6, and its registered office is Suite 2600, Three Bentall Centre 595 Burrard Street, P.O. BOX 49314, Vancouver, British Columbia, V7X 1L3.

Activities

Olive Fertility operates fertility centres that, directly or by way of its medical professionals, provide fertility treatment, fertility preservation, third-party reproductive services, and cryopreservation storage, including infertility diagnosis, egg retrievals, in vitro fertilization, embryo transfers, intrauterine insemination, and directed donation processing. Olive Fertility does not perform or manage gestational carrier services (aka intended parent matchmaking) but does perform the required medical screening and assessment on individuals wishing to be a surrogate for intend parents. Olive Fertility may act as the importer of record for the importation of human reproductive material into Canada, whether on its own behalf for sale to patients or on behalf of the intended parents. Olive Fertility does not operate a sperm or egg bank, but it does from time to time, in accordance with and subject to applicable law, obtain previously donated sperm for sale to its patients who will become the intended parents.

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Olive Fertility distributes reproductive material when it transfers material to other health care professionals or fertility centres in the ordinary course. Olive Fertility stores fertility drugs on behalf of its physicians but does not own or sell any drugs on its own behalf.

The processing and other uses of human reproductive material in British Columbia is governed by the *Assisted Human Reproduction Act* (Canada) and the medical treatments connected with them generally constitute the practice of medicine and are subject to the laws governing that practice, including the *Health Professions Act* (British Columbia).

Supply Chain

Olive Fertility sources medical consumables and devices, embryology and clinical equipment, office supplies, and required support services, such as genetic testing and diagnostic providers, in its operations, as well as, subject to applicable law, human gametes. A variety of equipment and consumables is required to process reproductive material, including some which is specialized to the field. Egg retrievals and embryo transfers are medical procedures that require the use of consumable medical supplies as well as medical devices such as ultrasounds.

Risk Assessment

Olive Fertility primarily contracts with suppliers who are well known in the fertility industry and those with a familiarity of the regulatory landscape in Canada and the United States of America. Olive Fertility has no foreign operations.

Olive Fertility takes a risk-based approach to ensure resources are targeted to those areas that have higher forced labour risk profile. Olive Fertility has identified the following areas of high risk within its industry:

- (i) coercion or trafficking of gestational carriers,
- (ii) coercion or trafficking of donors,
- (iii) sourcing of medical and embryology consumables from reputable suppliers who in turn source or produce materials in high-risk jurisdictions.

Olive Fertility has classified these risks areas as follows:

Area	Risk Factor	Key Source of Risk	Risk Concern
gestational carriers	vulnerable population	Brokers and Intended Parents	High
sperm donors	vulnerable population	Brokers and Intended Parents	Moderate
medical/embryology consumables suppliers	sourced from high-risk geographies	Suppliers	Moderate

Action Taken- diligence, training, and governance

Policy Position

Olive Fertility has taken the position that it will only acquire for resale sperm sourced from Canada and the United States of America and it will not source sperm from jurisdictions that are war torn.

Due Diligence

Olive Fertility sources its embryology consumable supplies, such as the media in which reproductive material is placed, from reputable suppliers based in Canada and the United States of America. Similarly, Olive Fertility sources its medical consumables and devices from reputable supplier, retaining a third party to assist in the diligence process. As medical supplies consumed are not specialized for reproductive medicine, Olive Fertility is able to access the “List of Goods Products by Child Labor or Forced Labor” published by the Bureau of International Labour Affairs (United States of America) to avoid products sourced from high-risk countries. Further, Olive Fertility has historically reviewed the statements on slavery from its main media supplier published on their websites mandated by California law and the laws of the United Kingdom.

Individuals who attend on site to donate sperm, or serve as a gestational carrier, undergo physical assessment and complete a thorough medical history questionnaire before being deemed suitable by the centre’s medical director. Although not directly tied by law to prohibitions on slavery or coercion, a fundamental component of medical practice is informed consent to a procedure, which is given willingly by an individual undergoing a procedure after having had sufficient information, understanding, and opportunity for consideration.

Policies and Governance

Olive Fertility has the following policies in place:

Policy	Purpose	Management
Code of Conduct	The Code of Conduct addresses ethical conduct in our work environment, business practices, and relationships with external stakeholders. The Code of Conduct details the standards of behaviour expected from everyone to whom it applies in their daily activities and in dealings with others.	The Code of Conduct is managed as part of Olive’s Ethical Reporting Program, which includes whistleblowing mechanics and routine training

Assessing our effectiveness and Remediation Efforts

We consider the risk of Forced Labour within Olive’s operations to be low. Our assessment of our business and supply chains for the risk of Forced Labour did not identify any instances of Forced Labour. As such, no steps were required to remediate the presence of Forced Labour, or the loss of income associated with remediation efforts.

Forward Commitments

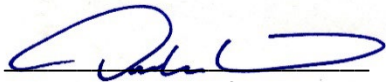
We plan to continue to review our statements, policies, procedures, and practices periodically to determine whether any enhancements should be made to reinforce our commitment to developing a culture vigilant to prevent Forced Labour from taking place as we build families.

Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Olive Fertility Centre Inc., on May 29, 2024. In my capacity as a Chief Executive Officer of Olive Fertility, and not in my personal capacity, I make this attestation for and on behalf of Olive Fertility Centre Inc. in accordance with the requirements of the Modern Slavery 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 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.

Dated this May 30, 2024.



Derek Larkin, Chief Executive Officer

I have authority to bind Olive Fertility Centre Inc.
