

## **Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report**

For the financial year ending May 31, 2024

This report is for Peak Achievement Athletics Inc. (“Peak” or the “Company”), a company incorporated in 2016 pursuant to the laws of the Canada Business Corporations Act. Bauer Hockey Ltd., a company incorporated in 2016 pursuant to the laws of the Canada Business Corporations Act and a subsidiary of Peak, is also covered by this Report.

The Company is committed to conducting its business according to the highest ethical and legal standards. The Company does not knowingly employ any type of involuntary labor and will not knowingly conduct business with any product manufacturing vendor (“Vendor”) that uses involuntary labor of any kind, including prison labor, indentured labor, bonded labor, child labor or labor obtained through human trafficking or slavery. The Company expects all of its Vendors and suppliers to comply with all applicable laws and regulations in the country of manufacture or exportation, as applicable, including but not limited to prohibiting the use of slave, forced, prison or child labor, and the Company expects its Vendors to prevent practices that could in any way contribute to human trafficking.

Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires covered Canadian companies to provide consumers with information regarding their efforts to prevent and mitigate the risk of forced labor or child labor in their activities and supply chain. The Act requires company disclosures in several areas, including: structure, policies, risk identification, remediation measures, training and an assessment of the effectiveness of its program. This report details the efforts undertaken by the Company in its Fiscal Year 2024, ending on May 31, 2024, to identify, prevent and reduce the risk of forced and child labor in its supply chain.

### Structure and Supply Chain

The Company is engaged in the design, manufacture and distribution of performance sports equipment and related apparel and accessories for ice hockey, roller hockey, and lacrosse. The ice hockey products include skates, sticks, helmets, protective gear, apparel, skate sharpening and profiling machines, and accessories. The roller hockey products include skates, helmets, protective gear, sticks and accessories. The lacrosse products include sticks (shafts and heads), helmets, protective gear and apparel. The Company’s products are primarily marketed under the BAUER, MISSION, MAVERIK, CASCADE, and PROSHARP brand names. The Company distributes its products principally in the United States, Canada, Europe, and China to specialty retail stores, sporting goods and national retail chains and directly to sports teams, as well as through digital platforms.

Additional information about Bauer Hockey and Cascade and Maverik Lacrosse can be found at their respective websites:

<https://www.bauer.com/>

<https://cascademaverik.com/>

The Company has completed a mapping exercise of the Tier 1 Vendors in its supply chain. A Tier 1 Vendor is an entity with which the Company directly conducts business and is the supplier of the finished product. The majority of these Tier 1 Vendors are located in China, Thailand and Vietnam.

The Company is currently mapping its nominated Tier 2 Vendors. A Tier 2 Vendor supplies materials to the Tier 1 Vendor that are subsequently incorporated into the finished products. A nominated Tier 2 Vendor supplies a material that has been evaluated and approved by the Company for use in a product.

### Policies and Processes

The Company distributes its Vendor Compliance Manual to all Vendors detailing the Company's own standards and policies. In fiscal 2024, the Vendor Compliance Manual included fair labor standards addressing child, prison and forced labor, and prohibitions against human trafficking and slavery. The Company reviews the Compliance Manual as a whole at least annually and distributes revised versions to its Tier 1 Vendors, requesting acknowledgement, agreement, and certification of receipt in writing. The Company is always reviewing and monitoring its Vendor relationships, and any found in violation of Company policies and standards may be terminated.

The Company also uses various tools to verify that its largest Vendors that manufacture its products operate fairly and safely and address the risks of human trafficking and slavery. The Company includes in its Manufacturing Agreements, which are in place with our largest Vendors, a set of Workplace Standard Policies requiring the Vendor to ensure that labor standards (including employment relations, non-discrimination, harassment/abuse, forced labor, child labor, collective bargaining, health and safety, wage and hours) are met and comply with all applicable laws. Vendors accept these standards when they enter into Manufacturing Agreements with the Company. These Vendors are expected to take reasonable measures to ensure that subcontractors are made aware of and comply with these standards. Additionally, these Vendors must agree that they will not employ workers younger than the minimum working age established by applicable law in the country of manufacture or age 16, or less than the age for completing compulsory education in the country of manufacture, whichever is higher.

The Company has implemented a compliance hotline (the "Compliance Hotline") through which employees, contractors and consultants may report their concerns. The Compliance Hotline is operated by an independent call center. Information provided through the Compliance Hotline will be forwarded and/or summarized in a report and delivered to the Board Chair for due consideration. Information submitted through the Compliance Hotline will be treated on a confidential or anonymous basis, to the fullest extent permitted under applicable law.

### Risk Identification and Assessment

The Company does not employ any type of involuntary labor and will not knowingly conduct business with any Vendor that uses involuntary labor of any kind.

The Company believes the greatest risk of forced and child labor exists in the product supply chain, specifically with apparel products and the possible use of materials or manufacturing locations

from the Xinjiang Uyghur Autonomous Region (XUAR) in China. As a result, the Company uses various tools to identify and assess these risks in its supply chain. These include:

- Supply chain mapping involves an evaluation of the type of product and any associated risk, as well as assessments of specific country risk.
- Targeted audits of new Vendors that are conducted prior to onboarding and follow-up site visits and audits.
- Engagement with largest Tier 1 Vendors through questionnaires to evaluate their policies and procedures related to recruitment practices and grievance mechanisms.

The information obtained from these assessments allows the Company to prioritize specific Vendors, products or regions for additional review.

### Remediation Measures

As of the date of this report, the Company has not identified any forced labor or child labor in its activities or supply chain. Should the Company identify forced labor or child labor in its activities or supply chain, it will respond appropriately, following international protocols.

### Training

The Company conducts mandatory training for all employees and members of management responsible for the Company's supply chain detailing the applicable laws and the Company's standards regarding human trafficking, slavery, forced and child labor in supply chains. The training program includes a combination of in-person training sessions and online training tools to reiterate the importance of compliance with the applicable laws and Company-specific policies and procedures regarding human trafficking, slavery, forced and child labor in supply chains.

### Assessment of Program Effectiveness

The Company seeks to do business with Vendors that share the Company's commitment and dedication to ethical and responsible business practices, and we encourage Vendors to promote best practices and to work towards continual improvement through their production operations and supply chains. The Vendors that share our commitment and dedication to these values become and remain the Company's Vendors. The Company routinely reviews and monitors its Vendor relationships and may terminate a relationship with any Vendor found to be in violation of the Company's standards. The Company has a zero-tolerance policy for any factory or factory employee found to violate child labor, forced labor, slavery, or human trafficking standards or laws. Such a violation may result in immediate suspension or deactivation of the factory or termination of the relationship.

The Company has the right to audit its Vendors and suppliers, as well as to conduct on-site inspections of Vendor facilities, to engage in announced and unannounced monitoring activities including confidential employee interviews, and to contract with third party auditors to ensure compliance. The Company determines which suppliers and Vendors to audit based on specific risk assessments as well as the results of previous audits and other information obtained by the Company.

As of the date of this report, the Company has not assessed the effectiveness of its actions to reduce the risk of forced labor and child labor in its supply chain. Going forward, the assessment may include additional monitoring of the supply chain, including audits and reviews of grievance mechanisms.

#### Continuous Improvement

The Company is continuously working to implement enhancements to its compliance program to ensure employees and its supply chains comply with all respective laws, including the Company's standards regarding human trafficking, slavery, forced and child labor in supply chains. To support this effort, the Company is continuing the mapping exercise for its nominated Tier 2 Vendors. The Company will also review its collaborations with its third-party apparel partners for compliance with internal policies and procedures. The Company is assessing its due diligence efforts, including the potential expansion of training and Vendor audits.

#### Approval and Attestation

This report was approved pursuant to paragraph 11 (4) (b)(ii) of the Act by the Board of Directors of Peak Achievement Athletics.

Full name: James Gabel

Title: Director

Date: May 22, 2024

Signature: /s/ James Gabel

*I have the authority to bind Peak Achievement Athletics Inc.*

This report was approved pursuant to paragraph 11 (4) (b)(ii) of the Act by the Board of Directors of Bauer Hockey Ltd.

Full name: Cathy Tymowski

Title: Director

Date: May 22, 2024

Signature: /s/ Cathy Tymowski

*I have the authority to bind Bauer Hockey Ltd.*