



# Fighting Against Forced Labor in the Supply Chain Report

A report fulfilling the requirements of Canada 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

RefrigiWear, LLC

Reporting Year: 2023

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## Introduction

The following document discloses RefrigiWear's policies and actions relating to slavery and human trafficking in business and the supply chain in compliance with the following regulations:

- California Transparency in Supply Chain Act (SB 657)
- UK Modern Slavery Act of 2015
- Canadian Supply Chains Act

As detailed below, RefrigiWear has developed and issued a code of conduct that states that we do not accept and strictly prohibit human trafficking, slavery, forced labor, or child labor in our supply chain.

RefrigiWear defines modern slavery, human trafficking, forced labor, and child labor as conduct which would constitute:

- a) an offence under Division 270 or 271 of the Australia Criminal Code; or
- b) an offence under either of those Divisions if the conduct took place in Australia; or
- c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d) Child labor, as defined under the Canadian Supply Chains Act, which means labor or services provided or offered to be provided by persons under the age of 18 years and that:
  - a. are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
  - b. are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
  - c. interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
  - d. constitute the worst forms of child labor as defined in article 3 of the Worst Forms of Child Labor Convention, 1999, adopted at Geneva on June 17, 1999. (travail des enfants)
- e) Forced labor, as defined under the Canadian Supply Chains Act, which means labor or service provided or offered to be provided by a person under circumstances that:
  - a. could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labor or service; or
  - b. constitute forced or compulsory labor as defined in article 2 of the Forced Labor Convention, 1930, adopted in Geneva on June 28, 1930. (travail forcé)

## Organizational Structure, Activities & Supply Chain

RefrigiWear is a commercial brand doing business in California, Canada & the United Kingdom. RefrigiWear provides a good or service, brings in annual, worldwide, “gross receipts” that exceed \$100M US, \$40M CAN, and has an annual turnover that exceeds £36M.

RefrigiWear is classified as a private limited liability company. RefrigiWear does business in the industrial workwear industry, providing protective apparel for extreme conditions, primarily supplying the global cold chain protective gear for its employees.

RefrigiWear’s supply chain is comprised of 20 factories, located in 8 countries around the world, supplied by a global network of material suppliers (primarily located in China). The bulk of RefrigiWear’s supply chain is located in China, Vietnam, India, Pakistan, & Ghana. In turn, RefrigiWear sells in multiple countries with its primary market being the United States, but also doing business in Canada, the United Kingdom & Europe.

## Due Diligence Policies

RefrigiWear conducts regular risk assessments of our supply chain, in consultation with subsidiaries and other entities RefrigiWear owns or controls. RefrigiWear utilizes a mix of internal risk assessments and globally recognized third party certification schemes to ensure compliance within the supply chain. Risk assessments are conducted during regular site visits with RefrigiWear staff visiting suppliers. Additionally, RefrigiWear may utilize certified third-party auditors to assess factories if the sourcing country is considered high-risk or if the supplier has been cited previously.

RefrigiWear conducts audits of Tier 1 suppliers to evaluate compliance with our company standards to prevent trafficking, slavery, and worst forms of child labor in our supply chains. Our audits are announced and performed by RefrigiWear staff. RefrigiWear did not utilize directed third-party auditing to detect human trafficking, slavery, forced labor, and child labor in the current reporting year.

In conducting our risk assessment, RefrigiWear also utilizes intelligence from a wide variety of sources, including the U.S. Government State Department’s Human Rights and/or Trafficking in Person reports, the Social Responsibility Committee of the American Apparel & Footwear Association (AAFA), press reports, & advocacy groups that focus on human trafficking.

Company staff combine this intelligence with our own intelligence gathered from both the formal and informal on the ground assessments it conducts internally to determine the areas of highest risk in our supply chain.

RefrigiWear does not believe that slavery, human trafficking forced labor, or child labor exist in our supply chain.

## Remediation of Incidences

RefrigiWear, on behalf of itself and on behalf of all subsidiaries and other entities RefrigiWear owns or controls, has set forth policies to address and remediate cases of human trafficking, slavery, forced labor, and child labor in our supply chain. RefrigiWear has developed and issued a code of conduct to our direct suppliers that states that we do not accept or condone human trafficking, slavery, forced labor, and child labor in our supply chain.

RefrigiWear also takes steps to push these policies further up the supply chain by encouraging suppliers to share this code of conduct or create their own utilizing the same principles to share with their suppliers. Tier 1 suppliers are made responsible for all actions in the suppliers they have selected.

If evidence of human trafficking, slavery, forced labor, or child labor is found, RefrigiWear will work with the supplier to ensure an effective remediation is achieved for the victims of such actions.

In the case of non-compliance, RefrigiWear reserves the right to examine the specific situation and develop the best possible strategy for resolution. If cases of non-compliance are not resolved within a timely manner, RefrigiWear may terminate the business relationship. While RefrigiWear wishes to aid in the resolution of incidences of human trafficking, slavery, forced labor, and child labor within RefrigiWear's supply chain, it is not possible to effectively solve the issue of noncompliance without the cooperation of the supplier.

No incidences were discovered during the current reporting year. No remediation of incidences was required.

## Management of Potential Risks

RefrigiWear, and subsidiaries and other entities RefrigiWear controls, have received acknowledgement from direct suppliers that materials comply with slavery, human trafficking, forces labor, and child labor laws of the countries in which they are doing business. This is achieved both through acknowledgement of the code of conduct and, in some cases, third-party facility certification schemes such as the (Worldwide Responsible Accredited (WRA)s).

RefrigiWear does not currently require direct certification from material suppliers and other entities beyond Tier 1.

## Reporting of Suspected Incidences

RefrigiWear, on behalf of itself and on behalf of all subsidiaries and other entities RefrigiWear owns or controls, maintains and enforces internal accountability procedures for employees and contractors who fail to meet company standards to prevent incidences of slavery, human trafficking, forced labor, and child labor in its supply chain. RefrigiWear practices due diligence in maintaining these standards. Any employee who suspects incidences of slavery, human trafficking, forced labor, or child labor at any point

in the supply chain is required to report such information to the Director of Product Quality or any other company officer. Such reports are taken very seriously and shall be investigated by the staff responsible for corporate social responsibility, which will include documentation and follow-up to the reporting party to acknowledge completion of an investigation.

No incidences were reported during the current reporting period.

## Remediation of Income

RefrigiWear, on behalf of itself and on behalf of all subsidiaries and other entities RefrigiWear owns or controls, has established policies and procedures to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labor or child labor in its activities and supply chains.

No remediation of income was necessary during the current reporting period.

## Training to Employees & Representatives

RefrigiWear, on behalf of itself and on behalf of all subsidiaries and other entities RefrigiWear owns or controls, conducts internal training on RefrigiWear's code of conduct to ensure the necessary participants in supply chain management are knowledgeable and aware of the issues and concerns surrounding the supply chain, including human trafficking, slavery, forced labor, and worst forms of child labor, with a particular focus on mitigating risks. RefrigiWear also encourages employees involved in our supply chain to participate in internal and external training programs and seminars on social compliance issues, human trafficking, slavery, forced labor, and child labor. Workshops, webinars, and other trainings are open to participation through RefrigiWear's membership in the Social Responsibility Committee of the American Apparel & Footwear Association (AAFA).

## Assessment of Effectiveness of Policies and Procedures

RefrigiWear, on behalf of itself and on behalf of all subsidiaries and other entities RefrigiWear owns or controls, continues to evaluate the effectiveness of our human trafficking, slavery, forced labor, and worst forms of child labor eradication efforts.

RefrigiWear will continue to utilize resources to monitor the global situation regarding human trafficking, slavery, forced labor and child labor and make adjustment to its risk assessment & due diligence procedures to ensure continued compliance with all local and international laws.

# Canadian Supply Chains Act Attestation

Reporting Entity: RefrigiWear, LLC

Reporting Year: 2023

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 have 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.

**Raja Dhandapani**

\_\_\_\_\_  
Name

**Chief Operations Officer**

\_\_\_\_\_  
Title

**5/29/2024**

\_\_\_\_\_  
Date

DocuSigned by:  
*Raja Dhandapani*  
303D98A34F8345ED

\_\_\_\_\_  
I have the authority to bind RefrigiWear, LLC

Signature