

**REPORT ON MODERN SLAVERY**

**FOR THE YEAR ENDED DECEMBER 31, 2023**



**Approved by the Board of Directors on May 29, 2024**

**TCG Wellness ULC  
3150 Harvester Road #201  
Burlington, ON L7N 3N8**

## **1. REPORTING REQUIREMENT**

This Report on Modern Slavery (the “**Report**”) is being prepared, filed and mailed by TCG Wellness ULC (“**TCG**”) in compliance with its reporting requirements under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This Report applies in respect of TCG’s financial year ending December 31, 2023 and is the first report prepared by TCG under the Act.

## **2. CORPORATE STRUCTURE, BUSINESS AND ACTIVITIES**

TCG is a private company incorporated under the *Business Corporations Act* (British Columbia) which is primarily engaged in the online retailing of replacement spa and hot tub covers and related accessories in Canada. Our head office is located at 3150 Harvester Road #201 Burlington, ON L7N 3N8. As of December 31, 2023, TCG had approximately 10 employees based in Ontario.

TCG has a network of North America-based suppliers that are economically diverse in terms of size, supplying replacement spa and hot tub covers and related accessories. The United States contributes to the highest proportion of suppliers and vendors based outside of Canada. The majority of our Suppliers are located in the United States.

## **3. POLICIES AND PROCESSES RELATING TO FORCED AND CHILD LABOUR**

In 2023, we worked to better understand our reporting obligations under the Act as they pertain to TCG and its supply chain and determined the risk of child labour or forced labour to be low. TCG’s corporate policy does not specifically address child labour or forced labour.

## **4. AREAS OF RISK**

As described above, TCG is a privately owned online retailer of replacement spa and hot tub covers and related accessories. We have determined that TCG’s activities and its direct supply chains, which are based in North America, do not carry a material risk of forced labour under the Act.

## **5. REMEDIATION MEASURES**

TCG has not identified any actual or reported instances of forced labour or child labour in its supply chain. No situations have arisen requiring implementation of any remediation measures, including the remediation of loss of income for vulnerable families.

## **6. TRAINING**

In 2023, TCG did not require formal training on forced labour or child labour for its own employees.

## **7. HOW WE ASSESS EFFECTIVENESS**

TCG acknowledges that modern slavery is a possible risk within its supply chain, though that risk is generally low. TCG will continue to ensure that effective systems are in place to reduce the risk of forced labour and child labour in its supply chain.

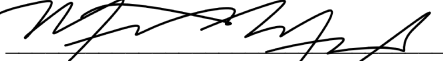
This Report was approved by the board of directors of TCG pursuant to section 11(4)(a) of the Act.

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.

Full name: Matthew Menard

Title: Vice President

Date: May 29, 2024

(Signed) 

I have the authority to bind TCG Wellness ULC