



Annual Report on Forced Labour in Canadian Supply Chains
2023





1. Introduction

TDL Gentek is governed by a core set of principles that supports our reputation for integrity and fairness which is one of our most valued assets. We are committed to upholding 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 (the Act) in both our business practices and attitudes. This joint report outlines steps taken by TDL Gentek within its financial year of January 1, 2023 to December 31, 2023 to comply with legislation and mitigate the risk of forced and child labour.

2. Structure, Activities and Supply Chain

TDL Gentek is comprised of 2 incorporated companies: TDL Canada Inc., and TDL Canada Holdings Inc. Both companies have a December 31 year end.

TDL Canada Holdings Inc. is a holding company that owns the majority of shares and does not participate in the activities of TDL Canada Inc. except for from a purely financial standpoint.

In January 2023, TDL Canada Inc. amalgamated with Gentek Marketing Inc. and TDL Canada Inc. was the continuing entity. Thus, the TDL Gentek brand was formed.

TDL Gentek is a national electronics wholesale company headquartered in Trenton Ontario with offices in Alberta, Ontario and Quebec. TDL Gentek currently has approximately 80 employees and supplies technological solutions to both companies and individuals within Canada. TDL Gentek purchases products globally (predominantly from the USA, Canada and China) from more than 20 vendors, to be sold within Canada.

3. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

TDL Gentek currently has in place several internal policies to ensure the highest levels of social responsibility and employee protection in our business practices, such as:





- Code of Conduct
- Health & Safety Policy
- Workplace Violence and Harassment Prevention Policy and Program
- Accessibility Policy
- Environmental Policy

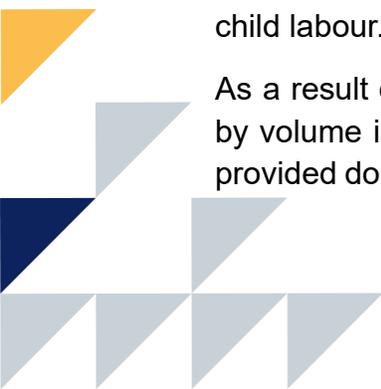
TDL Gentek does not use forced or child labour in our own operations and we are currently finalizing an official Supplier Code of Conduct to be introduced and implemented by the end of 2024.

TDL Gentek has always had due diligence processes in place to assess new suppliers in various ways to ensure their authenticity and lawfulness. These processes include but aren't limited to: confirming company information on Government/Regulatory sites, contacting references and reviewing financial information. Our Supplier Agreements have historically and will continue to have language with regards to the adherence of all Governing Laws/Supply Chain Standards. Historically, TDL Gentek has ceased relations with any supplier found to not be complying with laws or regulations and we are committed to taking that same level of action with any similar supplier issues in the future.

4. TDL Gentek Supply Chain Risks and the Steps Taken to Assess and Manage that Risk

As a distributor, the risk in TDL Gentek's supply chain lies in importing products. TDL Gentek conducted risk-assessments on our industry, business practices and supply chain. This risk-assessment process has now been adopted on an ongoing basis. Part of our risk-assessment was reviewing our industry using multiple Government sources. As a result, we also reviewed our vendors' operations locations. Per resources reviewed from the Canadian Government, UN Global Compact and the US Department of Labour, it was determined that electronics manufactured in China can be at risk for the use of forced and child labour.

As a result of our risk-assessment, we audited the suppliers making up 90% of our sales by volume in relation to Forced and Child Labour. All vendors were responsive and most provided documentation of their own modern slavery policies and programs. These policies





and programs were reviewed by executives in relation to Bill S-211 and were found to comply with the Act. TDL Gentek also drafted a Compliance Commitment to Bill S-211 that was sent to vendors without documentation (as they do not meet reporting requirements). All vendors signed and returned the Commitments, confirming their dedication to upholding the Act. These correspondences have opened lines of communication with all suppliers relating to the Act which will allow us to continue to implement new methods of mitigating the risk of modern slavery in our supply chain.

TDL Gentek also works with a third-party customs broker to ensure all regulations and laws are followed and duties are paid when importing all products into Canada. Our broker is also a resource for new regulations/legislation as well as guidance on how to best comply with said regulations/legislation.

5. Measures Taken to Remediate Forced Labour and Child Labour

As a result of the assessments outlined above, to date, TDL Gentek has not identified forced or child labour within our specific supply chain. Therefore, we have not taken any action to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

6. Training Provided to Employees on Forced Labour and Child Labour

All TDL Gentek employees are required to review and sign our Code of Conduct and Workplace Violence and Harassment Prevention Policy and Program. All employees also receive training related to our Accessibility Policy and Health & Safety Policy. All employees involved in the selection of suppliers have been sent resources regarding the new legislation and have been involved in conversations with executives and management in order to communicate TDL Gentek's commitment to the Act on an ongoing basis. TDL





Gentek is also finalizing specific language to be added to the employee Code of Conduct specifically related to forced labour and child labour by the end of 2024.

7. Assessing Effectiveness in Ensuring that Forced Labour and Child Labour are not Being Used in its Business and Supply Chains

TDL Gentek utilizes multiple resources in order ensure continued awareness and action when needed in ensuring that forced labour and child labour are not being used in its business and supply chains. These resources consist of:

- Monitoring Government/Regulatory sites for updates in regulations and legislation
- Reviewing any notices provided by our customs broker to determine whether they are relevant to our company and implementing any regulations or legislation required.
- Periodically reviewing supplier sites to confirm that all relevant policies are posted and ongoing conversations to verify that those policies are being employed.





Attestation and Approval

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 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: Laurie Tugman

Title: Chief Executive Officer

Date: May 30, 2024

Signature: *Laurie Tugman* I have the authority to bind TDL Canada Inc.

Full name: Laurie Tugman

Title: President

Date: May 30, 2024

Signature: *Laurie Tugman* I have the authority to bind TDL Canada Holdings Inc.

