



May 28, 2024

**REPORT ON MODERN SLAVERY ON BEHALF OF Teknion Limited , Teknion Groupe Quebec Inc., Roy and Breton Inc. and Teknion Roy & Breton Inc. (the "Report")**

**Modern Slavery Statement for the Financial Year Ending:**

1. November 30, 2023

**Business Numbers:**

1. Teknion Limited – 86723 4999
2. Teknion Groupe Quebec Inc – 82988 5862
3. Roy and Breton Inc – 10464 7599
4. Teknion Roy & Breton Inc. – 14460 5276

This Report is made on behalf of Teknion Limited, Teknion Groupe Quebec Inc., Roy & Breton Inc., and Teknion Roy & Breton Inc. (collectively "Teknion") on behalf of themselves pursuant to, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the "Act")*. This report is filed based on it being a "Joint Report" as defined under Section 11(2) under the Act.

Teknion Limited carries out business activities relating to the manufacturing and selling of products to customers in Canada. Teknion Limited also owns 100 percent of the shares of each of Teknion Groupe Quebec Inc., Roy & Breton Inc., and Teknion Roy & Breton Inc.

Teknion Groupe Quebec Inc., Roy & Breton Inc., and Teknion Roy & Breton Inc. carry out business activities relating to the manufacturing of products.

This Report outlines the approach and initiatives by Teknion to identify and address the risks of forced labour and child labour in business operations and supply chains during the financial year set out above.

*Teknion is deeply committed to respecting human rights and human dignity and ensuring our supply chain is free from forced labour and child labour.*

a. **Structure, Activities and Supply Chains**

i. **Group Structure**

- Teknion has various manufacturing plants, offices and warehouses located in the Greater Toronto Area, the Quebec City area and Calgary. Teknion's ultimate parent company is Teknion Corporation.
- Teknion Corporation's head office is located in Toronto.
- Teknion Limited's head office is located in Toronto
- Teknion Groupe Quebec Inc.'s head office is located in Levis, Quebec
- Roy and Breton Inc.'s head office is located in Saint-Valler, Quebec
- Teknion Roy & Breton Inc.'s head office is located in Saint Vallier, Quebec
- Teknion Corporation and its affiliates are privately held, and therefore the financial information about them is confidential and not publicly disclosed. In addition Teknion Corporation owns through subsidiaries, manufacturing facilities in North Carolina, USA, Kuala Lumpur, Malaysia, the UK and in India.
- Teknion sells commercial furniture products that are used in the office, hospitality, and educational sectors. This includes chairs, soft seating, desking, tables, filing, storage, architectural walls and accessories.
- Teknion sells its products through many third-party independent dealers around the world.
- A majority of Teknion's sales are to customers located in Canada and the United States.
- Teknion operates showrooms in Vancouver, Calgary, Edmonton, Toronto, Ottawa, Winnipeg, and Montreal.
- In Canada our products are sold through a network of independent dealers.
- In the U.S Teknion's subsidiary, Teknion LLC, sells products through a network of independent dealers.

ii. **Outline of Teknion's Supply Chain**

- Majority of the products manufactured by Teknion in Canada are made from parts and materials sourced from Canadian and American suppliers.
- A majority of these parts and materials have a U.S. or Canadian country of origin.
- Teknion has a vertically integrated supply chain of owned manufacturing facilities. Approximately 70 percent of the components used in our finished products are made by a Teknion Corporation owned facility. These owned facilities make components such as wooden and metal frames and parts, table tops, wire hamasses, and filing cabinets. In addition, Teknion purchases a large amount of other inputs such as injection molded plastic parts, polyurethane foam, etc. from suppliers that are owned by related companies.

- The largest single item Teknion purchases is cold-rolled steel. The country of origin of a majority of this steel is Canada.
- Teknion also purchases significant amounts of particle board, wood, laminates and aluminum. The country of origin of the majority of this is Canada.
- In addition, Teknion purchases a large number of other items such as fabric, foam, glass, paint, laminate, and mechanical components. A majority of these items come from suppliers based in Canada and the U.S.
- The glass that Teknion sources is from the US and the European Union.
- Teknion also purchases certain items such as leather and plastic components from suppliers based outside of North America, particularly the European Union, Korea, Taiwan, and China.
- Teknion components and parts purchased from suppliers outside of North America are incorporated into products manufactured in Canada.

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

i) Employee Policies and Training:

Teknion has a policy for all its employees and contractors entitled, "Teknion Policy Statement on Child Labour, Forced Labour and Human Trafficking". The policy statement has been distributed to all Teknion employees and is present on Teknion's intranet site for employees along with other policies. The policy sets out:

*"In every country in which Teknion operates, we support and respect the protection of human rights.*

*Teknion is committed to NO forced, bonded, involuntary and child labour practices. We adhere to and in many cases exceed all applicable labour laws and standards addressing issues such as equal pay, hours of work and child labour. We have no tolerance for use of child or forced labour in any of our operations or facilities and prohibit trafficking in persons. Teknion also prohibits recruitment practices whereby employees are charged recruitment fees and are denied access to identity documents.*

*We recognize that child labour, forced labour and trafficking, in all its forms, is a violation of fundamental human rights and are committed to conducting our business to the highest standards of ethics."*

In addition, Teknion has a "Code of Business Conduct and Ethics" for its employees, and a policy which allows for employees and suppliers to make anonymous complaints to a whistleblower contact.

ii) Teknion Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains

In addition, Teknion Corporation has adopted a policy statement for all its companies, operations and business units across the world (including Canada) relating to the elimination of child and forced labour, entitled "Teknion Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains". Extracts from the policy statement is set out below:

***"Teknion Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains***

*Teknion is committed to treating all business partners and members of our supply chains with dignity and respect. We are dedicated to combatting slavery and human trafficking in our supply chains and prioritize the well-being of the people who help manufacture our products, and supply materials to our supply chain.*

*Our Supplier Code of Conduct identifies areas of protections as related to human trafficking and cruelty, specifically:*

*Supplier will use only voluntary labor and will not use any forced, bonded, indentured, or convict labor.*

*While we manufacture up to 70% of our parts in-house, we rely on third party suppliers to provide the rest. We make certain that our suppliers sign and adhere to our Supplier Code of Conduct, which ensures that all Teknion's suppliers labor practices follow not only local laws, but also comply with internationally recognized human rights standards. We perform site checks at every supplier worldwide to make sure they uphold these standards on more than just paper.*

*Prior to adding any new vendor to the approved vendor list, an in-person, on-site audit takes place at the manufacturing site that is overseas (excluding US and Western Europe). This entails a specific day-long audit review including a site visit and employee interviews. Included in this audit are expectations related to suitable working conditions, employees of age completing the work, confirmation of a legitimate business structure, etc. ..."*

iii) Supplier Requirements Relating to Child and Forced Labour:

Each and every supplier to Teknion is required to meet a rigorous review prior to being accepted as a supplier. This review includes determining whether the supplier meets the requirements set out in Teknion's "Supplier Quality Manual" ("SQM"). The

SQM has been in place for many years. The SQM sets out amongst other things details relating to supplier selection, assessment, performance and monitoring, and required policies and procedures. Continued performance under the SQM is a requirement to remain as a supplier to Teknion. Included in the SQM is the "Teknion Supplier Code of Conduct" ("Code of Conduct"). The Code of Conduct sets ethical, legal and business requirements for Teknion suppliers.

The Code of Conduct is a condition for doing business with Teknion. Extracts of the Code of Conduct, relating to child and forced labour are set out below:

**"Supplier Code of Conduct"**

*"The Teknion Corporation, together with its operating companies, related parties and worldwide affiliates, (collectively referred to herein as "Teknion") are committed to maintaining the highest level of integrity, honesty and business ethics throughout all aspects of our supply chain. Teknion believes that long term, high integrity business relationships are built upon being open, honest and trustworthy, and complying with all local laws and regulations. To that end, all purchase orders and order acceptances are made subject to the terms of this Supplier Code of Conduct.*

1. (...)
2. *Supplier will use only voluntary labor and will not use any forced, bonded, indentured, or convict labor.*
3. *Supplier will assure that every employee is of working age. Child labor is prohibited. "Child" means a person younger than 15 (or 14 where local law allows, or, if higher, the local legal minimum age for employment or the age for completing compulsory education).*
4. *Supplier will treat each employee with dignity and respect, and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse. Supplier will make sure that they are not complicit in human rights abuses.*
5. *Supplier will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion or disability.*
6. *Supplier will respect the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty.*
7. *Supplier will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Where supplier provides housing, it shall be clean and safe living facilities.*

*Supplier will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally*

*mandated benefits. Except in extraordinary business circumstances, Supplier will not require employees to work more than the limits on regular and overtime hours allowed by local law. Supplier will compensate employees for overtime hours at such premium rate as is legally required or, if there is no legally prescribed premium rate, at a rate at least equal to the regular hourly compensation rate. Where local industry standards are higher than applicable legal requirements, Supplier should meet the higher standards. Any disciplinary wage deductions shall conform to local law."*

c. **Parts of Activities and Supply Chain That Carry Risks of Forced Labour or Child Labour Being Used and Steps Taken to Assess and Manage That Risk**

i. **Risks in Teknion's Operations and Supply Chain**

Teknion has detailed procedures, practices and policies in place for its Canadian operations relating to its employees and contractors. Teknion also has a dedicated Law Department and Human Resources Department that focus on amongst other things ensuring that Teknion meets all required Federal, Provincial and municipal laws. Teknion furthermore maintains a whistleblower hotline in which any concerns may be reported anonymously, and without fear of reprisal to the whistleblower, to the General Counsel and the CFO. Therefore, we believe there is very little risk in our Canadian operations relating to child or forced labour.

Teknion has a vertically-integrated supply chain which allows us to source many of the parts and components from our own facilities and those of related companies.. In addition most of our third party suppliers are North American-based and produce from facilities in North America. We acknowledge that there may be a greater risk related to suppliers in certain countries outside of Canada, the United States and the EU.

d. **Any Measures Taken to Remediate any Forced or Child Labour**

Teknion is not aware of any instances or allegations of forced or child labour in its business or supply chain.

e. **Any Measures Taken to Remediate 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 Chain**

Teknion is not aware of any instances where there was any loss of income because it has not identified any instances where child or forced labour is present in our activities or supply chain.

f. **Training Provided to Employees on Child Labour and Forced Labour**

Teknion has communicated to its employees our policy statement, "Teknion Policy Statement on Child Labour, Forced Labour and Human Trafficking" that sets out Teknion's position on prohibiting child and forced labour. In addition, Teknion's purchasing/procurement personnel who manage relationships with suppliers and potential suppliers are familiar with the Supplier Code of Conduct (referred to above) and its provisions relating to the prohibition of child and forced labour.

Teknion plans on carrying out further training on child and forced labour with its employees.

g. **How Teknion Assesses its Effectiveness Ensuring That Forced Labour and Child Labour Are Not Being Used in our Business and Supply Chain?**

Teknion is not aware of any instances of forced or child labour in its supply chain. Most of our suppliers are either affiliates of Teknion or are third-party suppliers that are based in Canada and the United States. We assess that there is very little likelihood that forced labour or child labour is present with these suppliers.

As part of its SQM supplier management process all suppliers must sign-off on the requirements of the SQM. This includes agreeing to comply with the Supplier Code of Conduct that includes detailed provisions directed against child and forced labour. Teknion personnel carry out audits of potential overseas suppliers including site visits to review their operations and procedures prior to any new supplier being approved. Teknion then carries out site visit audits on overseas suppliers on a periodic basis. The practice is for these audits to be carried out with relatively short notice to the supplier facility.

Teknion has not identified instances where it suspected child or forced labour during these supplier audits.

**Approval and Attestation of the Report**

This Report was approved by Mr. David Feldberg, the President and CEO of Teknion Limited, a Director of Teknion Groupe Quebec Limited, Director of Roy & Breton Inc., and Director of Teknion Roy & Breton. The undersigned attests that the information contained in this report is true, accurate, and complete in all material aspects for the purposes of the Act.

**Attestation:** In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this 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.



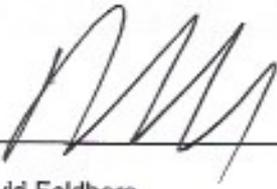
David Feldberg  
President and Chief Executive Officer and Director  
Teknion Limited  
May 28, 2024

*I have the authority to bind the Corporation*



David Feldberg  
Director  
Teknion Groupe Quebec Inc.  
May 28, 2024

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Director  
Roy and Breton Inc.  
May 28, 2024

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David Feldberg  
Director  
Teknion Roy & Breton Inc.  
May 28, 2024

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