

# Truck Shields, LLC. DBA Signature Products Group Report on Forced Labor in Supply Chains for the Financial Year Ending December 31,2023

Published: May 28, 2024.

#### Introduction

In accordance with the requirements laid out in the Fighting Against Forced Labor and Child Labor and Supply Chains Act (Canada) ("The Act"), Truck Shields dba Signature Products Group ("Signature Products Group", "we" or "us") provides the following report for the financial year 2023. This report will outline the controls put into place to prevent forced labor or child labor practices from entering our business and supply chain.

#### **Actionable Steps Taken in 2023**

Due to growing concerns of forced labor and child labor throughout the world, Signature Products Group took the following actions in 2023 to prevent and reduce the risk of these practices being introduced in our business and supply chain:

- We reviewed our current supply chain, including all direct suppliers, and their respective risk levels regarding forced labor and child labor.
- We reviewed and updated our Supplier Code of Conduct.
- Upon completion of the update, the Supplier Code of Conduct was distributed to our factory partners, reviewed by them, and returned with signatures of compliance by factory representatives. This document reemphasizes with all our direct suppliers our zero-tolerance standard for any instances of forced labor and child labor and asks them to commit to the same.
- We continue to conduct social compliance audits, both in person and through internationally accredited third-party auditing companies to verify our partner factories' actions.
- We have continued to utilize DNA testing labs to confirm the origin of natural fiber textile materials. This assists us in managing our sourced textiles accurately. This process provides us the ability to account for textiles and verify they do not originate from known conflict areas.

#### **Our Supply Chain and Operations**

Signature Products Group was founded in Salt Lake City, Utah in 2001, and the company headquarters remains there. We manufacture and produce licensed consumer products across multiple product categories for sale throughout North America. We work with a variety of companies to produce high quality consumer goods that will enhance their brands. We currently have approximately 87 employees, mostly located in Salt Lake City, Utah, but with others who work remotely throughout the United States. We also have a small office in India to help us manage our supply chain.

We have sourcing partners spread through many countries and require those suppliers to follow strict guidelines related to security and compliance in supply chains as outlined in our Supplier Code of



Conduct. We pride ourselves on finding reputable suppliers that will uphold our standards and follow them, just as we hold ourselves to those same standards of integrity and performance.

Our direct suppliers are in Asia, Southeast Asia, and Central America. Our current product offerings include apparel, apparel accessories, automotive accessories, pet accessories, eyewear (sunglasses), and a variety of bags including handbags, backpacks, duffel bags and cooler bags. These products are sourced in various countries throughout the world with trusted suppliers who commit to upholding ethical and legal standards. Signature Products Group takes great care and responsibility to continuously verify that agreed upon standards are being followed.

#### **Policies and Procedures**

Signature Products Group currently sources its products in many countries. While not all countries have the same inherent risks, the same actionable steps are taken by the company to verify a supplier's compliance with laws and regulations, regardless of location.

Signature Products Group verifies each supplier's risk before entering into any business agreements. The company requires suppliers to abide by the standards set out in its Supplier Code of Conduct that addresses not only the prohibition of forced labor and child labor, but also the health and safety of employees, human rights, compliance with environmental regulations, ethical and anti-corruption practices, and compliance with all legal regulations. The Supplier Code of Conduct includes work standards and clearly articulates that SPG does not tolerate the use of child labour or forced labour.

The specific section of the Supplier Code of Conduct addressing forced labor and child labor reads:

#### "Human Rights

...SPG will not do business with vendors who use prison, indentured or forced labor. SPG does not tolerate tactics that involve physical or psychological coercion in the workplace. SPG seeks vendors who are committed to wage and benefit levels that at a minimum address the basic needs of workers and their families. Vendors must pay employees wages and benefits that at a minimum meet all applicable laws governing minimum wage and mandated benefits, including those for overtime hours. SPG expects vendors to set working hours in compliance with all applicable laws. SPG expects vendors to provide a safe and healthy working environment for all employees. Vendors must take reasonable steps to prevent accidents and injury connected with the vendor's factory and facility operations, including systems that respond to health and safety risks and regular training to employees on workplace safety practices."

Signature Products Group requires that the supplier post this Supplier Code of Conduct in the language of its employees in all major workspaces and must effectively communicate the contents of the Code to those employees who are illiterate.

All suppliers must establish a mechanism where any grievances may be reported, and non-retaliation is to be enforced. Suppliers must provide access to any documentation relevant to the Supplier Code of Conduct (including any matters related to forced labor or child labor) to Signature Products Group upon request. SPG may, among other actions, terminate its relationship with a vendor if it fails to comply with



the Supplier Code of Conduct, including all future purchase orders (either directly with SPG or by subcontract with a vendor).

#### **Risk Assessment Practices**

Signature Products Group recognizes that there are inherent risks in any supply chain. Our direct suppliers undergo an ongoing process to mitigate the risks, but there are instances where we do not have visibility into all tiers of the supply chain. It is crucial that our direct suppliers understand our policies and commitment to following all legal requirements of the country they reside in.

In order to assess the risk of any particular supplier, Signature Products Group may employ a variety of methods. The risk of forced labor and child labor are considered during these assessments. Risk assessments include the following procedures:

- Identifying supplier's headquarters location, company structure, and their manufacturing sites. Prior to working with a supplier, we visit a supplier's manufacturing site to verify their claims of compliance.
- Identifying the supplier can fully manufacture the products it claims. This includes mapping out the supplier's own supply chain, to the extent possible, including any outsourced raw materials and components.
- Research into each supplier is done as circumstances allow. By understanding where the suppliers are located, where their raw materials and components come from, and comparing that information to countries and regions where forced labor and child labor are known to occur, the company can decide on the general risk of working with said supplier.
- On-site visits in the form of inspections and social compliance audits are undertaken by Signature Products Group employees, our licensing partners, and accredited 3<sup>rd</sup> party auditing companies at regular intervals. These visits verify (among other things) employment records, employee health practices, company safety practices, company payment procedures, and reporting methods for any infractions of legal regulations or the Supplier Code of Conduct.

All suppliers are subject to ongoing monitoring. Any suppliers found to be at higher risk in their risk assessment or with deficiencies in site visits may be subject to more frequent reporting requirements and corrective action plans to rectify deficiencies.

#### **Training**

Signature Products Group provides ongoing training to all relevant employees (including, but not limited to, operations, sourcing, compliance, and product development) to facilitate an understanding of the Supplier Code of Conduct. Any changes or revisions to the Supplier Code of Conduct are communicated to all relevant employees.

#### **Effectiveness Assessment and Remedial Measures**

Based on current company practices, reporting procedures, and company-led and third-party audit results, Signature Products Group has not found any instances of forced labor or child labor in its supply chain. Since no instances of forced labor or child labor have been found, no remedial measures have been necessary to remediate any such instances or any loss of income to the most vulnerable families. We remain committed to taking remedial measures in the event instances of forced labor or child labor



were to be identified. We are also committed to continuing our risk assessments and our high level of due diligence.

By verifying partners and their respective business structures and supply chains before a business relationship begins, we can partner with businesses that show their compliance through provable actions. Compliance is not a one-time check, but a continual process that Signature Products Group is committed to following. We also regularly review our policies and processes; track performance indicators related to our processes.

#### **Attestation**

This report is approved and attested as required under subsection 11(4)(a) and subsection 11(5) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Name: R. Dustin Zundel

Title: CEO

Date: 5/28/2024

Signature:

I have the authority to bind Truck Shields LLC dba Signature Products Group.

## TRUCK SHIELDS, LLC. (the "Company")

## RESOLUTIONS CONSENTED TO IN WRITING BY ALL THE DIRECTORS OF THE COMPANY

We, the undersigned, being all the directors of the Company, hereby consent to and adopt in writing the following resolutions:

#### WHEREAS:

- A. Under the provisions of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the "Act"), the Company is required to provide a report (the "Report") to the Minister of Public Safety and Emergency Preparedness of Canada ("Public Safety Canada") by May 31, 2024 pursuant to the requirements of the *Act* in respect of its prior financial year ending 2023, setting forth the steps taken by the Company to prevent and reduce the risk of forced labour and child labour in its business operations and supply chain and to publicly post such Report on its website in accordance with the *Act*.
- B. Pursuant to the provisions of the *Act*, the Report is required to be approved by the board of directors of the Company (the "Board"), and the Report is required be signed by a member of the Board.
- C. After being submitted to Public Safety Canada, Public Safety Canada will make the report available on a registry on its website. The Company must also publish the report on a prominent place on its website.
- D. The Report is included as Schedule A.

#### **BE IT RESOLVED THAT:**

- 1. After review and consideration of the Report, the Report in substantially the form and substance included as Schedule A, is hereby approved in accordance with subsection 11(4)(a) of the *Act*.
- 2. Any director of the Board is hereby authorized to sign the Report in their capacity as a director on behalf of the Board, including to sign an attestation on the Report in the following form on behalf of the Board;

"This report is approved and attested as required under subsection 11(4)(a) and subsection 11(5) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act."

[Full name, title, date, signature] "I have authority to bind Truck Shields LLC"

3. Management is authorized to file the Report with Public Safety Canada, to post the Report on the Company's website, to complete the required online questionnaire in the Public Safety Canada web portal, and to take such other actions as necessary to comply with the provisions of the *Act*.

This Resolution may be signed in as many counterparts as may be necessary, and any signature may be written, printed, scanned, stamped, or otherwise mechanically reproduced or may be an electronic signature or a digital signature created via a medium or a technology that ensures the authenticity and integrity of such signature including, without limitation, DocuSign and any counterpart may be delivered by means of electronic communication producing a printed copy, each of which so signed shall be deemed to be an original, and such counterparts together shall constitute one and the same instrument and notwithstanding the date of execution shall be deemed to bear the date set forth below.

DATED as of May 23, 2024.

DocuSigned by:  R. Darsabin Zellaselel	Pocusigned by:  Robert France  Robert France
Docusigned by:  Starples 5 - 000 4 4 DB	DocuSigned by:  LANU 5 012  Ed I 5 2008 500 10 C 94 FB
DocuSigned by:	

### Schedule A