

## Joint Forced Labour / Child Labour Report

for the Financial Year ending March 31, 2024



Trudell Medical  
Limited



Trudell Medical  
International Inc.



Trudell Healthcare  
Solutions Inc.



ProResp Inc.

### 1.0 Introduction

This joint report (the “**Report**”) is prepared by Trudell Medical Limited (“**TML**”) on its behalf and on behalf of its wholly owned subsidiaries Trudell Medical International Inc. (“**TMI**”), Trudell Healthcare Solutions Inc. (“**THS**”) and ProResp Inc. (“**ProResp**”), collectively hereinafter to as the “**Trudell Companies**”, “**we**”, or “**our**”.

This Report is for the fiscal year ending March 31, 2024 (“**Fiscal 2024**”) as required by the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

This Report summarizes the steps taken by the Trudell Companies during and since Fiscal Year 2024 (the “**Reporting Period**”) to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods that are produced, imported, sold, and/or distributed by the Trudell Companies.

### 2.0 Steps to Prevent and Reduce the Risk of Forced Labour and Child Labour

We took the steps set out below during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our operations and supply chain.

2.1 Each subsidiary of the Trudell Companies established a committee with multidisciplinary representation, including from senior management (President), procurement, finance, human resources, legal, regulatory, manufacturing, and contract management, to monitor and manage compliance with the Act (each, a “**Compliance Committee**”).



2.2 We retained outside legal counsel to assist the Compliance Committee in monitoring and managing compliance with the Act.

2.3 We initiated a review of current policies and existing procedures, codes and training to consider whether the issue of forced labour and child labour is addressed.

2.4 We and our outside counsel have begun providing live and recorded training to directors, officers, and certain employees within each of the Trudell Companies to familiarize them with forced labour and child labour risks and the new requirements imposed by the Act.

2.5 Each subsidiary of the Trudell Companies sent a self-assessment questionnaire to their suppliers of goods to learn more about their practices and operations to better assess the risks of forced labour and child labour in the supply chain and to map out the supply chains.

2.6 Each subsidiary of the Trudell Companies put in place a Supplier Code of Conduct that prohibits suppliers from supporting or engaging in any practices that constitute modern slavery or human trafficking in any part of their supply chain, including, without limitation, any practices that constitute forced Labour or child labour under the Act (collectively, the “**Supplier Code of Conduct**”). Each subsidiary of the Trudell Companies has provided a copy of the Supplier Code to their suppliers and asked that they review and sign it.

2.7 We drafted, and are in the process of implementing, contracting clauses that require suppliers to comply with the Supplier Code in all new supply agreements and terms and conditions of purchase.

2.8 Each Compliance Committee has initiated a review of its current supplier due diligence process to assess its adequacy for the purposes of compliance with the Act, including risk identification, mitigation, and remediation.

### 3.0 Structure, Activities and Supply Chains

#### 3.1 Our Structure

Each of the Trudell Companies is incorporated under the Ontario *Business Corporations Act* and is headquartered in London, Ontario, Canada. The Trudell Companies trace their origin back to 1922 in London, Ontario, Canada.

TML is the parent company of TMI, THS and ProResp. Each of TMI, THS and ProResp is a separate legal entity that has its own Board of Directors appointed by TML. TML is privately owned and its Board of Directors is comprised primarily of outside Directors. The Board of Directors has established an Audit and Risk Committee which assists the Board of Directors in its oversight of TML's compliance with applicable laws, including the Act.

All of the employees of the Trudell Companies are based out of Canada. In addition, TMI's subsidiaries have employees in Western Europe, Japan and Egypt.

### **3.2 Activities**

We aim to create a healthier future for all by leveraging our purpose-driven mission, team culture, and lived values. We are passionate and proud about patient safety and responsibly developing, producing and delivering high quality and innovative healthcare products and services that make a positive difference in patients' lives worldwide.

#### **TML**

TML provides professional services to TMI, THS and ProResp, but does not develop, manufacture, import, sell or distribute goods.

#### **TMI**

TMI directly, and through its subsidiaries and third-party business partners, primarily develops, manufactures, sells and/or distributes medical devices, including aerosol delivery and lung health devices, intended to manage and/or assist with the treatment of patients who suffer from respiratory diseases, including asthma, COPD, and cystic fibrosis. TMI's medical devices are marketed in over 110 countries worldwide.

TMI manufactures, assembles and packages its medical devices for sale in Canada and globally at its clean room manufacturing facility and warehouse in London, Ontario, Canada.

TMI is also the parent company of three wholly owned subsidiaries - Trudell Medical UK Limited, Trudell Medical Europe Limited, and Trudell Medical Australia Pty Ltd. Each subsidiary directly or through third party business partners markets and sells TMI's medical devices in jurisdictions outside of Canada.



## **THS**

THS assembles, packages, sells, distributes, and imports for sale in Canada medical devices and capital equipment for sale to hospitals, long term care establishments, and retail pharmacies across Canada. It also provides maintenance and repair services to those of its customers who have purchased capital equipment.

THS operates an assembly, packaging and warehousing facility in London, Ontario, Canada and a warehousing facility in St. Laurent, Quebec, Canada.

## **ProResp**

ProResp delivers directly, or through joint venture partnerships with hospitals across Ontario, medical devices and equipment and respiratory therapy services, through regulated healthcare professionals, to patients at their homes and long-term care facilities in the province of Ontario, Canada. ProResp patients typically suffer from chronic obstructive pulmonary disease and/or other respiratory diseases and breathing disorders.

### **3.3 Supply Chain**

Each of TMI, THS and ProResp have a team that is responsible for procurement. Each team aligns their approach and strategies in accordance with their respective operational plans and policies on the sourcing of goods and services.

## **TMI**

TMI's supply chain consists primarily of suppliers who manufacture tooling, plastic and silicone component parts, compressors for certain medical devices, packaging materials, automated assembly and packaging machines, measurement and calibration equipment, and electronic components. Most of these suppliers are located in Canada, the United States, China and Taiwan.

TMI's supply chain also consists of suppliers of professional and other services to support its development, manufacture, sale, importation and distribution of goods. Most of these suppliers are located in Canada, the United States, the United Kingdom, and the European Union.

## **THS**

THS's supply chain consists primarily of suppliers who are manufacturers or distributors of

medical devices, equipment, plastic components, and packaging materials. Most suppliers are located in the United States, China, Taiwan and Western Europe.

THS’s supply chain also consists of Suppliers of professional and other services to support its assembly, sale, importation and distribution of goods. Most of these suppliers are located in Canada and the United States.

### **ProResp**

ProResp’s supply chain consists primarily of suppliers who provide bulk oxygen, oxygen tanks, oxygen concentrators, certain types of ventilators, such as continuous positive air pressure machines, and medical devices and accessories used in the treatment and management of respiratory diseases and/or breathing disorders. Most suppliers are located in Canada, the United States, Germany, and China.

ProResp’s supply chain also consists of Suppliers of professional and other services to support its respiratory therapy services and importation, sale and distribution of medical devices and equipment. Most of these suppliers are located in Canada.

## **4.0 Policies and Due Diligence**

### **4.1 Policies**

#### **Core Values**

The Trudell Companies share the same core values as set out below.

#### **Respect**

We treat everyone in a dignified manner, as they would want to be treated. We believe in diversity and respect for all. We value each other’s points of view and keep an open mind to being wrong.

#### **Integrity**

We are honest and ethical and have the courage and conviction to do the right thing, even when no one is watching. Acting with integrity is a choice we always make.

#### **Trust**





We build trust through honesty, transparency and fairness. Trust is based on what we do, not on what we say.

### **Duty**

We are loyal and driven to be the best at what we do. Duty is responsibility and accountability. Deliver on your goals and objectives. Get the job done. Do it safely and ensure the safety of others. Do it in an environmentally responsible way that helps protect our planet.

### **Patient First**

Serving patients and their caregivers is a privilege. We earn that privilege by understanding their unmet needs, delivering solutions that improve quality of life, and keeping safety our priority.

### **Innovation**

We act on opportunities to do things better and turning problems into solutions. We keep an open mind and encourage creativity through diversity of thought. We have intellectual curiosity and a passion for solving problems.

Our core values represent the foundation of our culture and guide us in our day-to-day actions. We believe that aiming to reduce the risk that child labour or forced labour is used in the activities or supply chains of the Trudell Companies is consistent with our core values.

### **Code of Business Conduct and Ethics**

TML has a Code of Business Conduct and Ethics as approved by its Board of Directors. Each of TML's subsidiaries comprising the Trudell Companies also has a Code of Conduct, which is substantially the same as the TML Code of Business Conduct and Ethics, approved by each of their Board of Directors. Collectively, the Codes of Business Conduct and Ethics of the Trudell Companies are referred to as the "**Code of Conduct**".

The Code of Conduct sets out the expectations by which the Trudell Companies conduct their business activities, reflects their core values, and serves as a reference guide to their decisions. The Code of Conduct applies to all directors, officers and employees of the Trudell Companies as well as their respective independent contractors, who are required to comply with the Code of Conduct.

The Code of Conduct requires our people to conduct business in a manner consistent with our core values and in accordance with all applicable laws and regulations. Our people are



encouraged to be alert to any work-related activities which could constitute a violation of our Code of Conduct and to bring the matter to the attention of their supervisor, head of the department, HR or legal. If they feel uncomfortable asking questions, raising concerns, or reporting non-compliance directly with their supervisor, the head of the department, HR or legal, or if they wish to raise an issue anonymously, they are given the option of calling (via a toll free number) or sending an email to a Helpline. The Helpline is run by an independent company that is not staffed by any Trudell Company employees. The *Helpline* operates 24 hours a day, 7 days a week.

We do not retaliate against anyone who, in good faith, makes a report.

Individuals involved in illegal or unethical conduct may be subject to disciplinary action up to and including termination.

### **Supplier Code of Conduct**

Each of TMI, THS and ProResp has a Supplier Code of Conduct. Suppliers are required to sign the Supplier Code of Conduct, acknowledging their review and agreement to adhere to its terms. Prospective suppliers are required by contract to agree with the terms of the Supplier Code of Conduct.

The Supplier Code of Conduct makes it clear that corporate integrity, responsible product sourcing, and the safety and wellbeing of workers across the global supply chain are of foremost importance to the Trudell Companies.

The Supplier Code of Conduct sets out our minimum standards that we expect our manufacturers, vendors, and other suppliers of goods and services to meet. Our suppliers are responsible for compliance with the standards set out in the Supplier Code of Conduct throughout their operations and throughout their entire supply chain.

Our suppliers must comply with the standards of our Supplier Code of Conduct in their facilities and operations, including, without limitation, with respect to manufacturing, packaging, sales, product safety and certification, labour, immigration, health, worker safety, and the environment.



Our suppliers are responsible for compliance with these standards by their own suppliers, vendors, agents, and subcontractors. Our suppliers are required not to support or engage in any practices that constitute slavery or human trafficking in any part of their supply chain including, without limitation, any practices that constitute forced labour or child labour under the Act.

Our suppliers must comply with local and national laws and regulations that apply to wages, working hours, overtime, benefits, and any other work-related conditions in the jurisdictions where they operate. Our suppliers are required to ensure that workers have the right to freedom of movement without delay or hindrance or the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.

Our suppliers are required to allow workers to terminate their employment or work arrangement without restriction and without the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation. Our suppliers are required not to discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on characteristics protected under the human rights legislation in effect in the jurisdictions where they operate including, without limitation, the following characteristics: age, ancestry, colour, race, ethnic origin, place of origin, creed, disability, family status, marital status, gender identity, gender expression, record of offences, sex, and/or sexual orientation.

Our suppliers must also not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment or condone or tolerate such behaviour by any of their suppliers or other business partners.

Our suppliers are encouraged to make a report, including concerns of actual or potential misconduct, through a liaison whose contact details are set out in the Supplier Code of Conduct. We encourage our suppliers to make the Supplier Code of Conduct available to their own suppliers and other business partners.

### **Our Contracts**

Our contracts include standard form terms and conditions that require our suppliers to comply with applicable laws and regulations. A number of contracts also include provisions specifically restricting suppliers from supporting or engaging in any practices that constitute forced labour or child labour.





In addition, during the Reporting Period we drafted, and are now in the process of implementing, contracting clauses that require suppliers to comply with the Supplier Code in all new supply agreements and terms and conditions of purchase.

#### **4.2 Due Diligence**

During the Reporting Period, each subsidiary of the Trudell Companies sent a self-assessment questionnaire to their suppliers to learn more about their practices and operations to better assess the risks of forced labour and child labour in the supply chain and to map out the supply chains.

Each Compliance Committee is in the process of reviewing its due diligence processes that apply to supplier onboarding, monitoring suppliers' compliance with their contractual obligations and the Supplier Code of Conduct, detecting changes in risk during the supplier business relationship, and identifying steps and corrective actions to be taken if forced labour or child labour risks are detected.

### **5.0 Forced Labour and Child Labour Risks in our Operations and Supply Chains**

#### **5.1 Our Operations**

We consider the risk of forced labour and child labour in our operations to be inherently low due to the jurisdictions where our operations are located, our highly educated and skilled workforce, the regulated medical/healthcare industry we operate in, and the nature of our goods and services.

Our operations are located in Canada, and in TMI's case, also in the UK, Republic of Ireland, and Australia through its wholly owned subsidiaries. These are all jurisdictions that have enacted modern slavery legislation.

The Trudell Companies carry on their operations in accordance with applicable law, the Trudell Companies' Code of Business Conduct and Ethics, Core Values, Supplier Code of Conduct, and other applicable policies.

Our goods consist of regulated, proprietary medical devices and equipment. The healthcare services we provide are also regulated. None of our employees is under the age of 18 and each require a relatively high degree of technical and professional knowledge and training.



## **5.2 Supply Chains**

As we complete our supplier mapping exercise based on supplier self-assessment questionnaires and other tools, we will gain a better appreciation of the risks of forced labour and child labour in our supply chains. Our mapping exercises are also looking at the location of our suppliers' operations and the location of operations of their subcontractors and suppliers to determine whether any of these parties are located in jurisdictions that may present a higher risk of forced labour or child labour.

Given the high skill and education required to develop, manufacture, and supply medical devices and equipment and/or component parts used to manufacture medical devices, or to provide services to support those functions, we consider the risk of forced labour and child labour to be relatively low for our suppliers. This is the case for those suppliers with operations based in Canada, the United States, or Western Europe. We also have suppliers with operations in China and Taiwan that we have identified as having a higher risk profile. We are currently reviewing how best to assess and manage the risk in these jurisdictions.

## **6.0 Remediation Measures**

The Trudell Companies are in the process of conducting their due diligence review, including a mapping of their supply chain and compiling the results of their suppliers' self-assessment questionnaires.

To-date, they have not identified risks related to forced labour or child labour in their supply chains or in their own direct operations. As a result, we have not had to take any measures to remediate any forced labour or child labour or to remediate loss of income to the most vulnerable families that results from measures taken to eliminate the use of forced labour or child labour.

## **7.0 Training Provided to Employees on Forced Labour and Child Labour**

During the first quarter of fiscal 2025, we began providing specific training to directors, officers and certain employees in each of the Trudell Companies regarding forced labour and child labour risks, steps to prevent and reduce those risks and the requirements imposed by the Act. The training was provided by our external counsel and was mandatory for those identified



employee groups.

## 8.0 Assessing Effectiveness in Ensuring Forced Labour and Child Labour are not being used in our Business and Supply Chains

The Trudell Companies have begun to put in place policies and due diligence processes designed to understand the key issues and risks of forced labour and child labour and to mitigate those risks. However, we have not yet established a framework for assessing the effectiveness of our risk mitigation efforts. We plan to develop and implement a framework over the course of the next fiscal year ending on March 31, 2025.

## 9.0 Attestation Statement

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Trudell Medical Limited as the entity that controls Trudell Medical International Inc., Trudell Healthcare Solutions Inc. and ProResp Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest for and on behalf of the Board of Directors of Trudell Medical Limited that I have reviewed the information contained in the report for the entities listed above. Based on the knowledge of the Board, having exercised reasonable diligence, I attest for and on behalf of the Board that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the Reporting Period.

George T. Baran, Executive Chair  
Wednesday, May 29, 2024