



## **Modern Slavery Statement for the Financial Year ended December 31<sup>st</sup>, 2023**

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act, for the financial year ending December 31, 2023. It outlines the approach and initiatives taken by the subsidiaries of Trunkeast Investments Canada Limited and Trunkeast Holdings Limited (collectively referred to as "Trunkeast") to identify and address the risks of forced labour and child labour in our business operations and supply chains. This statement has been approved by the boards of directors of both Trunkeast Investments Canada Limited and Trunkeast Holdings Limited.

### **Introduction**

Trunkeast is committed to respecting human rights and ensuring that forced labor and child labor are not part of any product within our supply chain. This statement outlines our approach and initiatives to identify and address the risks of forced labor and child labor in our business operations and supply chains.

### **Group Structure**

Trunkeast Investments Canada Limited was established on December 28, 2007, and Trunkeast Holdings Limited was established on April 11, 2017. The head offices are located at 100 Zenway Blvd, Woodbridge, ON, Canada, L4H 2Y7.

#### **Trunkeast Investments Canada Limited – 82682 0359RC0001**

Major shareholder of the subsidiaries below:

1. Vision Extrusions Group Limited – 85600 0351RC0002
2. Vision Hollow Metal Limited – 81067 9019RC0001
3. Vision Coatings Limited – 75259 0687RC0001
4. Vision Building Products Limited – 81235 2359RC0001
5. Vision Automation Limited – 85469 5798RC0001
6. Vision Dominion Extrusions Limited – 78309 9724RC0002
7. Thermoplast Nexttrusions Limited – 75905 5460RC0002
8. Concord Compounding Limited – 76046 4263RC0001

#### **Trunkeast Holdings Limited – 71877 2320RC0001**

Sole shareholder of the entity below:

1. Vision Profile Extrusions Limited – 77076 2896RC0001



## **Supply Chain**

Our supply chain extends across seven countries and involves approximately 300 suppliers. We source a variety of materials and equipment, including:

- Chemicals and raw materials
- Maintenance supplies and equipment
- Packaging and storage materials
- Safety and personal protective equipment (PPE)
- Janitorial supplies
- Tooling equipment
- Office supplies

We procure raw materials and components from multiple suppliers to manufacture our products. Additionally, we package our products at our own facilities.

## **Risks in Supply Chain**

Given that the majority of our procurement is from North America, we believe that the risk of forced labour and child labour in our supply chain is minimal. However, we remain vigilant and continuously monitor our supply chain to ensure compliance with ethical standards and to mitigate any potential risks that may arise.

## **Actions Taken**

**Commitment to Human Rights and Labor Rights:** Trunkeast upholds a strong commitment to human rights and labor rights as outlined in our company policies.

**Supplier Agreements and Code of Conduct:** We have established supplier agreements that include a Supplier Code of Conduct, emphasizing adherence to ethical standards and labor practices. This code references Bill S-211 and highlights our stance against forced labor and child labor.

**Employee Education and Supplier Onboarding:** Regular employee education programs on human rights issues, including forced labor and child labor, are conducted. New suppliers undergo an onboarding process that includes awareness of these risks.

**Supplier Risk Assessment:** We developed a comprehensive Supplier Code of Conduct in line with Bill S-211. We regularly review and update our approved supplier list, conducting risk assessments for all suppliers. High and medium-risk suppliers are prioritized, but low-risk suppliers are planned to be addressed.



**Training for Purchasing Personnel:** All divisional purchasing personnel are trained on the Supplier Code of Conduct to ensure they understand and enforce our standards.

**Supply Agreements:** All new supply agreements include a statement on Trunkeast's position on forced labor and/or a reference to the Supplier Code of Conduct, requiring supplier sign-off.

**Compliance Monitoring:** We track and monitor supplier compliance with our ethical standards and conduct annual reviews of the supplier list to ensure any new suppliers are captured.

### **Risk Assessment**

Trunkeast conducts ongoing risk assessments to systematically identify and mitigate potential risks within our supply chain. Our commitment to maintaining a low-risk supply chain is reflected in our regular annual reviews. These reviews ensure that we stay vigilant in safeguarding against any emerging risks and uphold our standards of ethical sourcing and labor practices.

### **Remediation Process for Forced Labor and Similar Violations**

In the event forced or child labor is identified within our supply chain, Trunkeast would follow this remediation process:

1. **Assessment:** Evaluate allegations to understand exploitation and gather sufficient information.
2. **Identification:** Determine involvement of suppliers or labor providers implicated in violations.
3. **Reporting:** Promptly report allegations to relevant authorities for legal compliance and investigation.
4. **Evidence Collection:** Gather evidence, potentially using third parties for impartiality.
5. **Engagement:** Gather input from affected individuals to prioritize their needs.
6. **Immediate Actions:** Take swift corrective measures tailored to individuals' circumstances, such as housing support or legal assistance.
7. **Compensation and Restoration:** Provide compensation and support to victims, collaborating with local authorities and organizations with victims' consent.
8. **Monitoring:** Monitor progress and verify outcomes with local authorities and organizations.
9. **Documentation:** Document all remedial actions for transparency and accountability.

### **Training**

Trunkeast's employee training programs encompass thorough education on our policies, remediation procedures and supply chain risk identification. We conduct regular training sessions and awareness campaigns to foster sustained understanding and compliance.



**Effectiveness Assessment**

Trunkeast has implemented strong measures across all subsidiaries to assess the effectiveness of our initiatives in combating forced labor and child labor within our supply chain. Comprehensive training sessions have been conducted for all purchasing parties to ensure a deep understanding and consistent application of our policies and procedures. Suppliers identified as higher risk have been proactively engaged, receiving our Supplier Code of Conduct for thorough review and mandatory sign-off, reinforcing our uncompromising stance on ethical sourcing practices. Moreover, to enhance transparency and accountability, we have taken the proactive step of sharing a signed attestation of compliance with Bill S-211 with our customers, fostering trust and collaboration in our collective commitment to upholding labor rights and ethical standards.

This statement has been presented to Trunkeast's governing body and approved.

Name : VIC DE ZEN

Signature: V. de zen

Date: MAY 29, 2024