

Forced Labour and Child Labour Report 2023

Structure, Activities and Supply Chains

Virox Technologies Inc. (Virox) is a leading Canadian disinfectant manufacturing company with operations inside Canada. Virox is on a mission to stop pathogen risk – for humans and animals – by developing the world’s safest, most effective, eco-friendly disinfectant chemistries. We recognize that risks of forced, and child labour do exist, and continue to manage these risks through collaboration with our workforce and supply chains.

Virox is legally classified as a corporation and is subject to the legal requirements in section 11 of the *Fighting Against Forced Labour and Child Labour Supply Chains Act* (the Act). This report was made with respect to the Act and was approved by the Board of Directors before submission.

Organizational Structure

- Executive Leadership Team
 - President and CEO: Chief Science Officer, Executive VP/President of Commercial Markets, VP of Corporate Affairs - all reporting to the CEO.
 - COO: Executive VP of Finance, Executive VP of Manufacturing - all reporting to the COO.
- Corporate Affairs Team
 - EVP of Corporate Affairs oversees the corporate marketing team, the creative and design team and the workplace care and events team.
- Research and Development and Quality Assurance Teams
 - The Chief Science Officer oversees the research and development product portfolio team, the regulatory affairs team, and the quality assurance team.
- Commercial Team
 - EVP/President of Commercial Markets oversees the product marketing team, the strategic alliances team, the niche markets team, the commercial business analysis team, and the marketing and animal health team.
- Manufacturing Team



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- EVP of Manufacturing oversees the material managements team, the facilities team, and the production and manufacturing team.
- Shared Services Team
 - COO
 - Director of IT Services: IT Infrastructure Services Manager, and Helpdesk Administrator reports to them.
 - Director of Human Resources.
 - EVP of Finance: Controller, Manager FP&A, and Financial Coordinators reports to them.
 - All of the above report to the COO.

Organization's Mandate/Role:

- To stop pathogenic risk for human and animals leaving a legacy of sustainability we can pass on to future generations through the development of the world's safest, most effective, and environmentally sustainable disinfectant chemistries.
- Our vision is to create a planet safe from infectious disease and harsh toxic chemicals.

Number of Employees in Canada: 100 employees

Number of Employees outside of Canada: 0 employees

Virox does not have partnership organizations.

Memberships in groups include:

- National Association of Veterinary Technicians
- Registered Veterinary Technologists and Technicians of Canada
- Fear Free
- American Association of Swine Veterinarians
- Association for Professionals in Infection Control and Epidemiology
- Infection Prevention and Control Canada
- Canadian Consumer Specialty Products Association
- Webber Training

Activities and Supply Chains:

- Distributors
 - Aceto
 - Azelis Canada
 - Barrentz Canada
 - Brenntag Canada
 - Chempoint (Division of Univar)
 - Debro Inc.
 - First Continental International
 - Hannabry
 - Hawkins, Inc.
 - IMCD
 - NetChem
 - Polyrho Inc.
 - Quadra Inc.
 - UBA
 - Univar Solutions
- Manufacturers:
 - Agilix Fragrances
 - Arkema
 - Chemsynergy
 - Ethox Chemicals
 - JarChem Chemicals
 - SeaLand Chemical
 - Zschwimmer & Schwarz, Inc.

Virox is diligent in maintaining that it does not conduct business with organizations that utilize forced or child labour. If such practices are brought to the company's attention immediate action with those vendors, suppliers, distributors, or manufacturers will be taken.

Policies and Due Diligence Processes

As discussed above, Virox does not conduct business with companies who use forced labour and child labour. A pre-qualification questionnaire is given to all current and prospective vendors to continuously check in and report their commitment to eliminating these practices.

The board of directors is accountable for Virox's strategic objectives, including sustainability matters, as well as overseeing risk management systems. Our process ensures that the board of directors is informed on the interrelationship between the business environment and its associated risks and is intended to facilitate and stimulate discussion of our key business risks.

Parts of its Business and Supply Chains that Carry a Risk of Forced or Child Labour

The human resource policies Virox implements insures that child and forced labour is prevented and strictly prohibited. In our *Code of Conduct* under *Ethics and Legislative Compliance* it is stated that "Virox Technologies Inc. does not use, condone, or support the use of forced and/or child labour of any kind in our business and supply chain". This applies to all the manufacturers and distributors listed in this report and reinforces the company's expectations for conducting business and expected behaviours. It reflects our strong commitment to human rights. Our *Ethics and Legislative Compliance* policy applies to all employees, directors, officers, and contingent workforce contractors within the company.

Our new vendor prequalification questionnaire form asks:

- "Does your company (or companies you represent) engage in Forced and/or Child labour?" which accounts for manufacturing companies in addition to our distribution companies.
- "Does your company have a public facing commitment to preventing forced and/or child labour? (ex. sustainable sourcing policy)".

Virox asks that organizations in our supply chain sign a *Statement of Commitment* (a commitment to fighting forced labour and child labour in our supply chain) as an extra measure to ensure that organizations respect our commitment to the requirements of the Act. Virox is also starting to implement site audit forms with new and existing vendors – which includes an anti-slavery/child labour component to our audit forms. We report actual or potential non-compliances with our policies or our legal requirements, including those in relation to forced and child labour, so they can be addressed properly. Personnel are required to report any actual

or suspected violation of the law or *Code of Conduct*, including those in the context of forced labour and child labour, and all health, safety and environment related hazards, potential hazards or incidents, of which they become aware.

Virox is also a member of the *Partners in Protection Program* which works with the Canadian Border Services Agency (CBSA) to enhance border and trade chain security. The CBSA assesses your business's supply chain security and guides you through the process of adding security measures if needed. An added benefit is status as a trusted trader in Canada and in other countries under the CBSA's growing list of mutual recognition arrangements (MRAs).

Measures Taken to Remediate Forced or Child Labour

Virox does not engage in business with vendors who are identified as using child/forced labour. If such an incident occurs, follow up actions will be taken with any company that identifies the use of child/forced labour.

Virox's greatest risk exposure to forced labour and child labour is through suppliers, and the primary sources of these risks come from procuring goods in higher-risk geographies and sectors. We recognize the potential risks of forced labour and child labour in our extended supply chain and the complexity and challenges in operationalizing modern slavery compliance.

Virox has established a team of current employees in 2023 to examine our supply chain for high-risk activities and suppliers for forced labour and child labour risks. While we have internal processes to ensure compliance with the Act, this is the first iteration of our analysis and reporting to comply with the new annual reporting requirements imposed by it.

While the information above represents the current known risks of modern slavery for Virox, it characterizes the findings from our initial supply chain review at a particular time. More work is underway internally to monitor supplier activities efficiently and effectively with respect to modern slavery, and high-risk categories and countries may change in the future as we learn more.

In accordance with our process, suppliers that are providing materials and services for our projects and operations can only do so after completing the vendor qualification questionnaire

discussed above. Again, the questionnaire requests information from suppliers as to whether they have a public facing commitment that deal specifically with forced labour and child labour.

For suppliers that meet a residual risk exposure level for activities connected to child and forced labour based on their questionnaire answers Virox follows up with further requests for information and escalation to senior management, where appropriate.

High-risk suppliers, materials, and manufacturing sites that are flagged by Virox's internal processes may be subject to additional internal due diligence screening and risk controls.

In 2023, no suppliers screened were found to have forced labour or child labour issues.

Measures Taken to Remediate Loss of Income for Those Affected

Virox has been mapping its procurement activities and supply chain to better understand which areas of its activities or supply chain may carry an increased risk of forced labour and child labour. The assessment and identification of risks is an ongoing effort. Results of these assessments will help inform the adoption of appropriate measures seeking to address any identified risks of forced labour and child labour in its activities and supply chains.

Since Virox's processes did not yet yield any evidence of forced labour or child labour, we did not implement any remediation measures in the 2023 fiscal year.

Training Provided to Employees on Forced Labour and Child Labour

Upholding human rights, including both forced labour and child labour, is explicitly addressed in Virox's annual *Customs Trade Partnership Against Terrorism* (CTPAT) training. This is a voluntary supply chain security program focused on improving the security of private companies' supply chains. Every employee is expected to read, understand, and comply with the principles and requirements set out in the CTPAT training policy and is required to complete the training.

How Virox Assesses its Effectiveness in Ensuring that Forced or Child Labour isn't Used

Virox is committed to developing a resilient and transparent supply chain where the human rights of every worker involved are respected. During 2023, our focus was on further enhancing our foundational capabilities and processes to continue to effectively manage our suppliers on



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critical forced labour and child labour issues to ensure human rights are not violated within our supply chain.

While Virox believes in the efficacy of our measures to prevent and mitigate forced labour and child labour within our operations and supply chain, we will strive to maintain and continually improve our sustainable and transparent supply chain, and work to maintain a robust understanding of our complex global supply chain networks. These activities include assessing contractual terms and working with vendors, suppliers, distributors and manufacturers to measure the effectiveness of their actions to address forced labour and child labour.

Attestation

This statement has been approved by Virox's Board of Directors May.31.2024, for the financial year ending December.31.2023 regarding Virox's reporting obligation under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

In accordance with 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 indicated above.

Martin Harry
Chief Operating Officer
May.31.2024

A handwritten signature in black ink, appearing to read "M. Harry", with a horizontal line underneath.

I have the authority to bind Virox Technologies Inc.