



Duha Color Services Ltd.
CONNECTING THE WORLD WITH COLOUR

**Report to confirm compliance with The Fighting
Against Forced Labour and Child Labour in Supply
Chains Act**

Duha Color Services, Ltd

May 2025



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. 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.

Full name: Rick G. Duha

Title: Chief Business Officer, Duha Color Services, Ltd

Date: May 15, 2025

I have the authority to bind Duha Color Services, Ltd.

Signature: *Rick G Duha*

Note:
This report received approval from the Board of Directors of Duha Color Services, Ltd in May 2025.



Report to confirm compliance with The Fighting Against Forced Labour and Child Labour in Supply Chains Act

Company's general information

Reporting entity's legal name: Duha Color Services

Financial reporting year: 2024

Mandatory Initial Report for 2024

Business number: 10150 9925

Duha Color Services is an entity for the purposes of the Act.

Sector/industry: Manufacturing / Printing and related support activities.

Location: Winnipeg, Manitoba, Canada.



Executive Summary:

This report provides an overview of Duha Color Services' compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. The report covers various aspects, including the organization's structure, activities, supply chains, policies, due diligence processes, risk assessment, remediation measures, and training programs related to forced labour and child labour.

Mandatory information

a) Structure, activities and supply chains:

Duha Color Services, Ltd is a privately owned, for-profit corporation registered in the Province of Manitoba. The company employs approximately 260 people and operates with a standard chain-of-command structure, where department managers report to Directors, who report to the Chief Operating Officer. Specializing in manufacturing colour collateral, such as fandecks, colour chips, and colour cards, Duha Color Services conducts all its production at a single facility in Winnipeg, Manitoba.

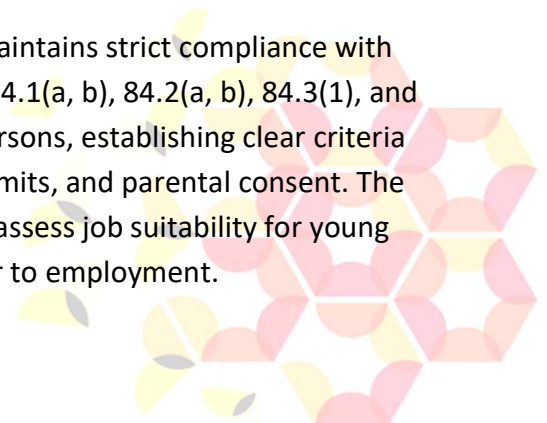
The company sources raw materials from domestic and international suppliers, including paper, paint, printing plates, ink, laminating film, glue, and corrugated cartons. Notably, paper is the largest volume of raw material used in our manufacturing processes, sourced from paper mills in the USA and South Korea through distributors in Canada. The supply chain for Duha Color Services includes suppliers and manufacturers from several countries, with a significant majority of raw material suppliers based in Canada and the USA.

b) Policies and due diligence processes in relation to forced labour and child labour

Compliance with Child Labour and Forced Labour Legislation

Duha Color Services Ltd. affirms its full commitment to preventing child labour and forced labour across all areas of its operations. In alignment with both legal mandates and ethical employment standards, the company ensures that all practices conform to the Manitoba Employment Standards Code and related labour regulations.

In regard to child labour prevention, Duha Color Services Ltd. maintains strict compliance with Part 2, Division 14 of the Code, including sections 84(1), 84(2), 84.1(a, b), 84.2(a, b), 84.3(1), and 84.3(2). These provisions regulate the employment of young persons, establishing clear criteria for minimum age, types of permissible work, required work permits, and parental consent. The company enforces internal procedures to verify employee age, assess job suitability for young workers, and ensure all necessary documentation is on file prior to employment.



With respect to forced labour prevention, Duha Color Services Ltd. ensures compliance with the following sections of the Code, which collectively safeguard employee autonomy and fair treatment:

- Minimum Wage – Part 2, Division 1 (Section 6)
- Standard Hours of Work – Part 2, Division 2 (Section 10)
- Overtime – Part 2, Division 3 (Section 19)
- General Holidays – Division 4 (Sections 21–30)
- Annual Vacation – Division 5 (Sections 34–44)
- Weekly Day of Rest – Division 6 (Sections 45–49)

These provisions ensure employees receive lawful compensation, predictable work hours, rest periods, and statutory holidays. Duha Color Services Ltd. monitors compliance through regular audits of timesheets, payroll records, and scheduling practices. Managers and HR personnel are trained to identify and address any indicators of coercive labour conditions, and procedures are in place for employees to report violations confidentially.

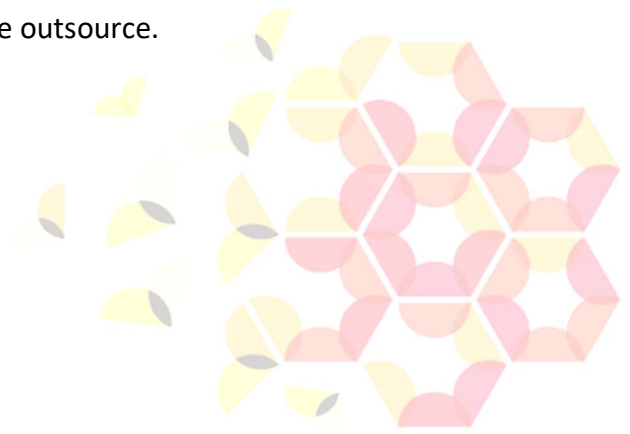
This approach reflects the company’s ongoing dedication to maintaining a safe, legal, and respectful work environment free from exploitation.

We are also committed to upholding ethical standards in all aspects of our business, including our supply chain practices. Duha Supplier Code of Conduct outlines the expectations and requirements for all suppliers to ensure fair, safe, and responsible business practices.

A copy of the Code of Conduct is accessible on our website: www.duhagroup.com We ask all Suppliers to acknowledge that they have received and read the Duha Supplier Code of Conduct. Suppliers who are deemed to present a higher potential risk may be asked to certify compliance with this document.

c) Risk Assessment and Management:

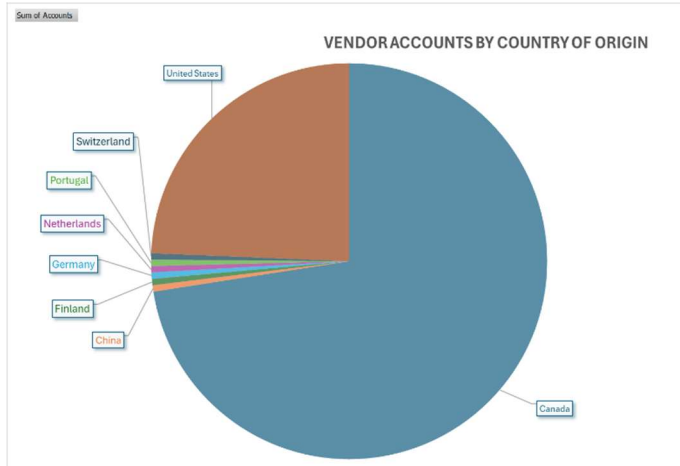
Duha Color Services, Ltd is committed to identifying and mitigating risks of forced labour or child labour within our business and supply chains. We are actively evaluating risks based on the country of origin of our suppliers and the materials we outsource.



Steps to assess the risk:

Mapping suppliers.

We have reviewed all of our supplier lists to confirm the country of origin to assess possible risks in Duha's supply chain.



Country	Sum of Accounts
Canada	140
China	1
Finland	1
Germany	1
Netherlands	1
Portugal	1
Switzerland	1
United States	47
Grand Total	193

Collecting information

Our next step was to look for some of the available research and investigation on child labour and forced labour to identify potential countries or regions with a higher risk of presenting this phenomenon.

Several reputable online resources offer valuable insights and tools for identifying and addressing the risks of child and forced labour.

The Our World in Data page on child labour (<https://ourworldindata.org/child-labor>) presents a comprehensive, data-driven analysis compiled by researchers at the University of Oxford. It provides global trends, statistics, and visualizations that help organizations understand the scale, distribution, and drivers of child labour, facilitating informed risk assessments based on regional and economic factors.

The Child Labour Platform's Global Map (<https://childlabourplatform.org/map>) is an interactive tool developed by a business-led initiative that enables users to explore real-world cases, legal frameworks, and risk levels of child labour across different countries and sectors. It supports proactive due diligence by highlighting geographic and industry-specific vulnerabilities.



Finally, the International Labour Organization (ILO) (<https://www.ilo.org/topics-and-sectors/forced-labour-modern-slavery-and-trafficking-persons#ils>) offers a robust section on forced labour, modern slavery, and human trafficking, which outlines international legal standards, ILO conventions, country-specific reports, and practical guides. This resource is essential for aligning corporate policies with international labour standards and strengthening prevention strategies. Together, these websites equip organizations with critical knowledge and tools to assess exposure, develop risk mitigation plans, and uphold human rights in global operations.

Assessment

Based on a comprehensive review of our supplier list and the supporting data collected, we identified only one supplier operating in a region classified as higher risk for child and forced labour. Our analysis indicates that this supplier has only occasionally contributed very small components used in one of our finished products.

Despite the limited scope of this relationship, we have proactively initiated a due diligence process with this supplier. As part of this process, we have formally requested that they conduct a thorough labour practices assessment and provide documentation demonstrating compliance with international labour standards and local employment regulations.

This targeted action is part of our broader commitment to responsible sourcing and risk mitigation, ensuring that even low-volume suppliers are held to the same standards of ethical conduct and legal compliance.

Given that Duha Group operates a single Canadian production facility and sources finished inputs mainly from low-risk jurisdictions (Canada and the United States), exposure beyond Tier 1 suppliers is currently assessed as negligible. We will review this conclusion each year and expand the scope if risk levels change.

Because all production occurs at one site under direct supervision and our hiring practices mirror provincial union-standard protocols, dedicated modern-slavery training is not expected to add material control value at this time. We will revisit the need for specialised training in our 2025 assessment.



Another Audit.

Duha Color Services, Ltd. was audited by Preferred by Nature Canada in November 2023. This audit included a demonstration of Duha Color Services, Ltd.'s compliance with the Forest Stewardship Council's core labour requirements, specifically addressing forced labour and child labour. Duha is pleased to report that it is in full compliance with these requirements.

d) Remediation Measures:

Duha Color Services, Ltd. has not undertaken any specific remediation measures for forced labour or child labour within our activities and supply chains, as our assessments have not identified any high-risk factors.

e) Addressing Loss of Income:

Duha Color Services, Ltd. acknowledges the importance of addressing potential income loss for vulnerable families resulting from measures taken to eliminate forced or child labour within our activities and supply chains. However, no specific measures have been implemented in this area to date.

f) Employee Training:

Duha Color Services, Ltd. has not conducted any training sessions for employees on the topics of forced labour and child labour. This is because Duha Color Services, Ltd., along with its officers, managers, and Human Resources staff, consistently applies care and due diligence in adhering to all labour laws and employment standards of the Province of Manitoba.

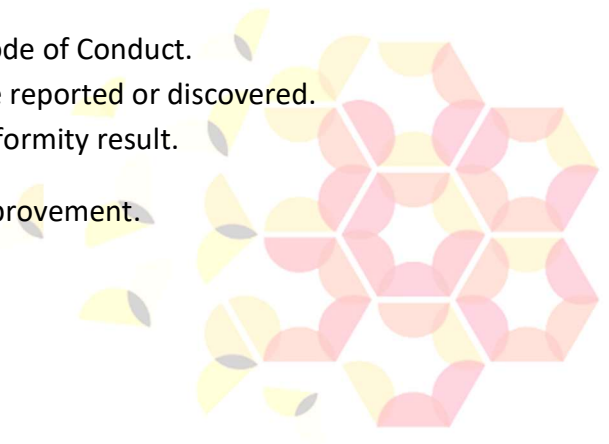
g) Effectiveness Assessment:

Based on the previous assessment, Duha Color Services, Ltd. Can confirm that there is a low risk that any of its Tier 1 suppliers are using any forced labour and child labour in its business and supply chains, which require no further action to be taken by the company.

To gauge effectiveness we track three key indicators:

- 100 % of Tier 1 suppliers (193/193) acknowledged our Code of Conduct.
- 0 substantiated incidents of forced or child labour were reported or discovered.
- 1 third-party audit was completed with a zero-non-conformity result.

These metrics will be reviewed annually for continuous improvement.



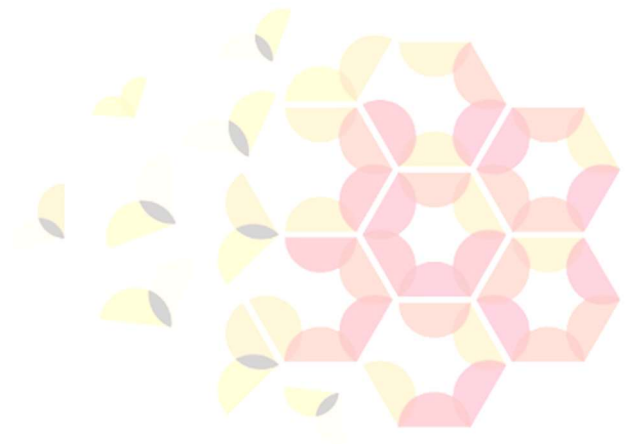
Steps taken in the previous financial year:

- In Q2 2024 we completed a comprehensive Tier 1 supplier mapping and assessing exercise covering 193 active vendors.
- In Q3 2024 we issued updated purchase-order terms that embed our Forced- and Child-Labour Code of Conduct.
- In November 2023 Preferred by Nature performed an on-site audit of our Winnipeg facility; no non-conformities were identified.
- Minor follow-up actions were closed by 15 December 2024.”

Since filing our inaugural 2024 report we have:

- Finalised the Tier 1 supplier map and risk-ranked vendors.
- Started a deeper assessment on the one single vendor located in a high risk zone.
- Added Code-of-Conduct acceptance language to all standard purchase orders.

These steps strengthen our due-diligence framework and reflect lessons learned in year 1.



Annotated Bibliography – Resources for Child and Forced Labour Risk Assessment

1. Our World in Data. (n.d.). *Child Labor.*

Retrieved from: <https://ourworldindata.org/child-labor>

This resource, developed by researchers at the University of Oxford, provides comprehensive global statistics and trends on child labour. It includes visualizations, historical data, and socioeconomic analysis, allowing organizations to understand where and why child labour is most prevalent. The site supports risk assessment by offering a macro-level view of vulnerabilities across countries and sectors, making it useful for identifying high-risk regions in supply chains.

2. Child Labour Platform. (n.d.). *Global Map of Child Labour Risk.*

Retrieved from: <https://childlabourplatform.org/map/>

This interactive map is part of a multi-stakeholder initiative aimed at helping businesses address child labour in supply chains. The platform displays country-level data, case studies, legal frameworks, and sector-specific risks. It enables users to conduct geographically and industry-targeted assessments and supports compliance planning by highlighting local legal requirements and enforcement trends.

3. International Labour Organization (ILO). (n.d.). *Forced Labour, Modern Slavery and Human Trafficking.*

Retrieved from: <https://www.ilo.org/topics-and-sectors/forced-labour-modern-slavery-and-trafficking-persons#ils>

The ILO's portal on forced labour consolidates international legal instruments, conventions (e.g., Convention No. 29 and No. 105), sectoral guidance, and country-specific reports. It serves as a global benchmark for best practices in forced labour prevention and offers tools and policy frameworks for aligning corporate compliance strategies with international labour standards. This resource is essential for developing legally sound and ethically robust risk prevention programs.

