

## PEARL RIVER HOLDINGS LIMITED

### MODERN SLAVERY REPORT

For the financial year ended December 31, 2024

This report is made by Pearl River Holdings Limited and its subsidiaries listed in Annex A to this report (collectively, “**Pearl River**”) pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This is Pearl River’s first modern slavery statement pursuant to the Act and is made for the financial year ended December 31, 2024.

#### Introduction

Pearl River is committed to acting ethically and with integrity in all of our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business. We strive to work closely with our suppliers to ensure their workforce, and the workforce of their supply chains are treated with respect and dignity. Pearl River is committed to fostering inclusive workplaces and sourcing products responsibly.

#### Structure and Activities

Pearl River conducts its business in manufacturing and sale of plastic products through its subsidiary companies in Hong Kong, the People’s Republic of China, and Cambodia. The business can be split into two basic areas: plastic products manufacturing and distribution segment (the production and distribution of plastic injection products such as pails, pallets, buckets, crates, baskets, and coolers), and support segment (providing accounting and financial support as well as strategic planning).

Pearl River has the following wholly owned direct and indirect subsidiaries: Pearl River Plastics Limited (“**PRPL**”), Rodman Plastics Company Limited (“**RPCL**”), Rodman Enterprises Limited (“**REL**”), Guangzhou Rodman Industrial Design Services Co. Ltd. (“**GRIDS**”), Rodman International Limited (“**RIL**”) Rodman (CDA) Limited (“**RCL**”), Glow Pear Inc (“**GPI**”) and Glowpear PTY Ltd (“**GPL**”). Pearl River also indirectly owns 64% of Guangzhou Rodman Plastics Company Limited (“**GRPC**”) and 65% of Rodman Cambodia Ltd (“**RCL**”). Pearl River primarily acts as the support segment, REL, GRIDS, RIL and RCL primarily act as the retail segment, and GPRC primarily acts as the manufacturing and distribution segment. PRPL, RPCL, RCL and GPI are holding companies.

Pearl River distributes its products to countries including **China, Australia, South America, Europe and the United States**.

#### Supply Chain

Pearl River sources goods such as smaller plastic products and components used in manufacturing in the operation of its business. Pearl River sources products from approved vendors and suppliers in Hong Kong and China. Pearl River maintains strong relationships with its base of suppliers and closely monitors its supply chain to reduce all types of risks.

#### Risk Assessment

Pearl River has assessed the risks of forced labour or child labour within its own operations to be low. Our workers are employed in the Quanzhou Guangdong China region, a city that is very modern and progressive. In addition, we have workers employed in Phnom Penh area of Cambodia. In our factories, we have fair and responsible employment practices in place to protect and promote workers rights. In addition, many of our non-Chinese customers send personnel on an ongoing, surprise visit, basis (in order to comply

with their own legislative requirements which are similar to the Act), in order to audit, review and monitor our manufacturing working conditions and review our employment records to ensure that our compliance and treatment of staff is fair and reasonable.

Although we believe that our suppliers are like-minded, Pearl River recognizes that there may be risks of exposure to forced labour and child labour through its suppliers. Pearl River is committed to better understanding such risks in the coming fiscal year.

### **Policies and Due Diligence**

Pearl River is committed to sound corporate governance practices which are in the best interest of its shareholders, contribute to effective and efficient decision making and also promote compliance with applicable laws, such as the Act. To achieve this goal, Pearl River has implemented a *Corporate Governance and Compensation Committee Terms of Reference* (the "**Corporate Governance Policy**") and a *Whistle Blower Policy*, among other policies. Pursuant to the *Corporate Governance Policy*, the Corporate Governance and Compensation Committee is required to provide the Board with recommendations and responses to applicable laws and guidelines, such as the Act, and is required to ensure that the Company has adequate policies and procedures to comply with applicable laws and guidelines, such as the Act. In addition, pursuant to the *Whistle Blower Policy*, the Company has a complaint procedure where any unlawful, illegal or improper actions or behavior by or within the Company, including the forced labour or child labor that the Act is trying to eliminate, can be brought to the attention of the Chief Executive Officer of the Company, or an independent third party, without fear of reprisals or retaliation for reporting such actions or behavior.

Pearl River will consider adopting additional policies, such as a *Code of Ethics*, *Board Mandate*, *Anti-Slavery Policy* or a *Supplier Code of Ethics* and child labour within its own operations as well as its supply chains.

In addition, Pearl River will continue to strengthen the processes it has in place to reduce risks related to forced labour and child labour within its operations and supply chains.

### **Training**

All Pearl River employees have a role to play in upholding the Company's high standards of integrity and ethical behaviour. Although Pearl River does not presently offer formal training programs or materials specifically targeted at the prevention of modern slavery in its supply chain, it will consider the development of appropriate training resources.

### **Remediation Measures**

In this reporting period, no instances of forced labour or child labour have been identified in Pearl River's operations or supply chains, and, as such, no remediation measures have been necessary and no measures could have led to loss of income to the most vulnerable families.

### **Assessing Effectiveness**

Pearl River periodically reviews its policies and continuously seeks to improve its practices. As it explores and implements further measures to prevent and mitigate modern slavery risks in its operations and supply chains, Pearl River will monitor and review performance to assess the effectiveness of any actions taken.

**Approval**

This Report was approved by the Board of Directors of the Company on May 28, 2025 on behalf of the Company and also on behalf of the entities listed in Annex A hereto pursuant to subparagraph 11(4)(b)(ii) of the Act.

Pearl River Holdings Limited



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George Lunick  
Chief Executive Officer and Director  
May 28, 2025

I have the authority to bind Pearl River Holdings Limited.

**ANNEX A**

**List of Entities Included in the Report**

Pearl River Plastics Limited

Rodman Plastics Company Limited

Rodman Enterprises Limited

Guangzhou Rodman Industrial Design Services Co. Ltd.

Rodman International Limited

Guangzhou Rodman Plastics Company Limited

Rodman (CDA) Limited

Rodman CA (Cambodia) Co. Ltd

Glowpear Inc

Glowpear PTY Ltd