

Report under S-211: Addressing Forced Labour in Supply Chains

1. Introduction

This report constitutes the second modern slavery report for Trendium for the fiscal year concluding on December 31, 2024. This is a consolidated report covering all entities operating under the group. The objective of this report is to outline our efforts in identifying, addressing, and mitigating risks associated with forced labour and child labour within our supply chains.

2. Structure, Activities, and Supply Chains

Trendium, legally known as Trendium Management inc., which controls the following entities:

- Trendium Holding Company Inc.
- Trendium Pool Products Inc.

Our Canadian headquarter is situated at 7050 Rue Saint Patrick, LaSalle, QC, operates within the manufacturing sector. Our primary activities involve the production and distribution of parts and kits for above-ground pools, excluding liners and accessories. All our employees are based in Canada. Our supply chain extends domestically and internationally, involving the import of steel and resin components predominantly from the USA and China.

3. Policies and Procedures

During the fiscal year ended December 31st, 2024, Trendium took steps to formalize and implement policies and due diligence processes to address forced labour and child labour risks:

Due Diligence Processes: We have a centralized supplier approval process to ensure all new suppliers adhere to our standards. This process involves detailed assessments and verification against our supplier code of conduct.

Supplier certification: We are requesting our top suppliers to provide a *Supplier Certificate Statement* regarding forced and child labour, which includes the following compliance points:

- a) **Modern Slavery and Child Labour Policy:** Suppliers must establish formal policies explicitly addressing modern slavery and human trafficking.
- b) **Communication:** Effective communication of policies on forced and child labour to their supply chain.
- c) **Supply Chain Due Diligence:** Processes for identifying, assessing, and mitigating risks of forced and child labour.

- d) **Compliance with Legislation:** Adherence to relevant forced labour and child labour legislation and regulations.
- e) **Continuous Improvement:** Ongoing monitoring and enhancement of efforts to combat forced and child labour.

4. Risk Assessment

Trendium has started the process of identifying parts of its activities and supply chains that carry risks of forced labour or child labour, acknowledging the importance of addressing remaining gaps in the assessment.

To date, no instances of forced labour or child labour have been identified in Trendium activities or supply chains. Therefore, no remediation measures have been required or undertaken.

5. Actions Taken

To date, no instances of forced or child labour have been reported within our supply chains. We have not identified loss of income for vulnerable families resulting from measures taken to eliminate forced and child labour. However, recognizing the potential risks, we have taken proactive measures:

- a) **Enhanced Supplier Screening:** Implement rigorous screening processes for current and new suppliers.
- b) **Risk Assessment Tools:** Develop and implement a risk assessment procedure to identify and mitigate risks in the supply chain, including geographic and sector-specific risk factors.
- c) **Ethical Sourcing Policies:** Update and enforce strict ethical sourcing policies that clearly outline expectations and consequences for non-compliance with labour standards.
- d) **Zero-Tolerance Policy:** Implement a zero-tolerance policy for forced labour and child labour, with clear consequences for violations, including termination of contracts.

By implementing these measures, we are confident that we can substantially mitigate the risk of forced labour and child labour in our overseas manufacturing operations and among our local suppliers.

6. Actions to be Taken

To date, no instances of forced or child labour have been reported within our supply chains. There has been no identification of loss of income for vulnerable families resulting from measures taken to eliminate forced and child labour. However, recognizing that there may be potential risks, we shall continue with the approach established, including due diligence processes and procedures and timely verifications.

These actions aim to continuously enhance Trendium commitment to ethical practices and ensure compliance with the law, thereby strengthening the integrity and transparency of our supply chains.

7. Monitoring and Effectiveness

We are implementing robust methods to track the effectiveness of our policies and procedures related to forced and child labour. This will include regular audits to ensure compliance with established standards.

8. Training

We are in the process of implementing an awareness and prevention of forced and child labour training program for key employees.

Approval and Attestation

In compliance with the requirements of the Act, specifically section 11, I hereby attest that I have thoroughly reviewed the information contained in this report. Exercising reasonable diligence, I confirm that the information presented is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year specified above. I have the authority to bind Trendium Management inc. and all of its subsidiaries.

We reserve the right to amend this report upon receipt of additional information.

Full Name: Guy Parent

Title: Vice-President

Date: May 31, 2025

Signature: **GUY PARENT**
