



Forced Labor in Canada Supply Chain Act Annual Report

2025 Financial Reporting Year

Business Number: 137892972

Single Entity – Partnership

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Canadian Office Location:

Havi Global Solutions Canada LP

1 Concord Gate, Suite 303

Don Mills ON M3C 3N6



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Entity Categorization

The entity imports goods into Canada that are produced from various contracted factories located around the world (China, Vietnam, USA, France, etc.).

The Canadian office is essentially a sales office, and no product is stored or sold from that facility.

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Entity Structure	<ul style="list-style-type: none"> • Produces goods outside of Canada • Imports goods into Canada that were produced outside of Canada • Sells goods inside & outside of Canada • Distributes goods inside & outside of Canada
Canadian business presence	<ul style="list-style-type: none"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada
Size-related reporting thresholds	<ul style="list-style-type: none"> • Has at least \$20 million in assets for at least one of its two most recent financial years • Has generated at least \$40 million in revenue for at least one of its two most recent financial years
Applicable laws in other jurisdictions	<ul style="list-style-type: none"> • The United Kingdom’s Modern Slavery Act 2015 • California’s Transparency in Supply Chains Act • USA’s Uyghur Forced Labor Prevention Act 2021
Sectors/Industries operating in	<ul style="list-style-type: none"> • Manufacturing • Retail Trade • Accommodation & Food Services
Entity’s Principal Location	<ul style="list-style-type: none"> • USA



Entity Forced Labor/Child Labor Prevention Actions

The Entity has implemented a **Supply Chain Human Rights Code of Conduct** and shared with their global production partners. It is reviewed with all our production partners via an annual audit process. These annual accountability steps include but are not limited to:

1. Mapping activities & supply chains
2. Conducting internal assessments of risks of forced labor and/or child labor in the organization's activities and supply chains
3. Contracting an external assessment of risks of forced labor and/or child labor in the organization's activities and supply chains
4. Developing and implementing an action plan for addressing forced labor and/or child labor
5. Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
6. Addressing practices in the organization's activities and supply chains that increase the risk of forced labor and/or child labor
7. Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labor and/or child labor in the organization's activities and supply chains
8. Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labor
9. Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labor and/or child labor in their activities and supply chains
10. Developing and implementing child protection policies and processes
11. Developing and implementing anti-forced labor/child labor contractual clauses
12. Developing and implementing anti-forced labor/child labor standards, codes of conduct and/or compliance checklists
13. Auditing & monitoring suppliers
14. Developing and implementing grievance mechanisms
15. Developing and implementing training and awareness materials on forced labor/child labor
16. Developing and implementing procedures to track performance in addressing forced labor/child labor
17. Engaging with supply chain partners on the issue of addressing forced labor and/or child labor
18. Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labor and/or child labor
19. Engaging directly with workers and families potentially affected by forced labor and/or child labor to assess and address risks

Entity Additional Due Diligence Efforts with Supply Chain Partners

The Entity has taken the additional specific actions with their manufacturing partners to mitigate forced & child labour in our Canadian inbound Supply Chain.

- An **internal social compliance team** regularly visits the Asia Pacific vendors and also executes an annual audit of the facilities, which includes a forced labor component.
 - For any factories that our internal team cannot visit in person, we engage a locally based third party audit firm to visit.
 - Our internal social compliance team holds an annual supplier conference to share best practices and review case studies; this is in addition to compulsory training that suppliers are periodically required to attend.
 - We have also provided basic social compliance training to our Quality & Safety team that are on site at facilities, or which visit factories to be aware of issues and report to them.
 - All our primary factories are required to have a social compliance team in place on site and a supplier's adherence to these compliance standards is measured as a KPI in their annual performance assessment.
- In addition to the internal team audit, there is also an **external audit** required by our client which is undertaken by accredited third party audit firms (for example: Ethical Supply Chain Program).
- There are **two mechanisms for whistleblowing** available to factory employees to utilize if needed. One goes direct to tms and the other goes direct to the Ethical Supply Chain organization. Posters with details are put up on visible areas around the factories.

Entity self-review of Due Diligence Actions

The Entity takes the following actions to self-audit & measure the effectiveness of their Due Diligence process related to Forced & Child Labor risk mitigation.

1. **Regularly review & audit the organization's policies and procedures** related to forced labor and child labor risk prevention.
2. **Track relevant performance indicators**, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labor/child labor clauses.
3. **Partner with an external organization to conduct an independent review or audit** of our organization's actions.
4. **Work with their suppliers to measure the effectiveness of their actions** to address forced labor and child labor, including by tracking relevant performance indicators.



2025 Entity Annual Outcome

The entity has reviewed their end-to-end supply chain processes and validated with their vendors to proactively identify any forced labour risks in their inbound Canadian supply chain.

To the best of our knowledge and based on our proactive ongoing partner training and self-audit efforts we have not identified any instances of forced or child labour in our supply chain.

Signed Attestation

In accordance with the requirements of the “Fighting Against Forced Labour and Child Labour in Supply Chains 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 listed above.

A handwritten signature in blue ink, appearing to read "K Schoell", written over a light blue rectangular background.

Kate Schoell, Senior Director, Global Supply Operations
Havi Global Solutions (Canada) LP