



IVC VITA
HEALTH
ENRICHING YOUR HEALTH

FORCED AND CHILD LABOUR STATEMENT 2025

Bill S211: An Act to enact the fight against forced labour and Child labour in supply chains and amend the customs tariff (the “act”)



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About this Report

This report has been prepared jointly by IVC Vita Health Holdings Inc. and its subsidiary, Vita Health Products Inc. (collectively, “IVC Vita Health”) in response to the requirements of *Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”) for our financial year beginning January 1, 2025, and ending December 31, 2025, (“Reporting Period”).

Vita Health Products Inc. is wholly owned and controlled by IVC Vita Health Holdings Inc. In all operations and across its supply chain, the risk of forced and child labour is managed in a coherent and consistent manner. Our foremost priority is the safety, health and wellbeing of all employees. This priority extends to human rights considerations including the prevention of forced and child labour. This is our third report in response to the Government of Canada’s directive under Bill S211.

IVC Vita Health’s **Code of Conduct** mandates that employees provide services and create products demonstrating superior quality and efficacy while ensuring that our operations do not negatively impact the environment. Our organization is committed to ensuring the protection, promotion, and fulfilment of human rights to our employees and those within our supply chain.

We have **zero tolerance** for the exploitation of children or adults and will not permit the use of forced or child labour within our supply chain. No worker should be indebted or coerced to work. We require employees in our supply chain to work freely, to be informed of the terms and conditions of their employment beforehand, to be fairly compensated as promised, and to be provided with safe, healthy, and fair working conditions. IVC Vita Health does not hire anyone younger than 18 years of age, and mandates that our suppliers employ only individuals who meet the minimum age permitted by law in their local jurisdictions. No worker will be required to surrender identification papers, pay for recruitment services, or take on debt as a prerequisite for employment.

IVC Vita Health is committed to conducting business in a socially and environmentally responsible, fair, and ethical manner in full compliance with international and local laws. Respect for Human Rights is an essential part of this commitment. To fulfill our responsibilities related to Bill S211, we have created a thorough and proactive strategy as detailed in this report.

OUR “ENRICH” VALUES



About IVC Vita Health

We are dedicated to sustainability, which encompasses a responsibility to ensure a safe, healthy, and equitable work environment for our employees and those within our supply chain.

IVC Vita Health Holdings Inc, a Canadian federal Corporation, was incorporated July 29, 2021, with business number 785583501RC0001. The registered address of IVC Vita Health Holdings Inc. is 360 Main Street, 30th Floor, Winnipeg, MB R3C 4G1.

Vita Health Products Inc., a Canadian federal corporation, was incorporated on July 14, 2008, pursuant to section 185 of the Canada Business Corporations Act incorporation number 448633-1 with business number 890450661RC0002. The registered address of Vita Health Products Inc. is 150 Beghin Avenue, Winnipeg, MB R2J 3W2.

The majority of Vita Health Products Inc. employees work and live in Winnipeg, MB, Canada.

Vita Health Products Inc. is a private company, wholly owned and controlled by IVC Vita Health Holdings Inc., that has at least \$20 million in assets, has generated at least \$40 million in revenue and employs approximately 610 employees for at least one of the two most recent financial years.

Vita Health is locally overseen by the CEO who reports directly to the Chairman of the IVC Nutrition Corporation group of companies.



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Activities

IVC Vita Health Products manufactures, packages, imports, and distributes over the counter (OTC) pharmaceutical products and natural health products (NHP) to the Canadian market.

The firm is authorized by Health Canada to manufacture over-the-counter medicines, natural health products, and class A precursors. All items sold in Canada are authorized in compliance with Health Canada regulatory standards.

Vita Health Products Inc. supplies finished goods to all leading Canadian retailers in the mass market grocery and pharmacy channels. The firm additionally offers contract manufacturing services for various National Brand clients and has a small export operation for natural health products, which currently accounts for under 2 percent of its annual sales.

In the Reporting Period, Vita Health Products Inc. sold approximately **30 million** units of finished goods to the Canadian market.

Vita Health Products Inc. sources raw materials, bulk natural health and over-the-counter (OTC) drug materials, and packaged final goods for use in its manufacturing, primarily, but not exclusively from North America, India, and China.

We maintain approximately 260,000 square feet of manufacturing, packaging, and distribution facilities in Winnipeg, Manitoba. On site, we have a full-service pharmaceutical laboratory with capabilities in analytical chemistry, microbiological analysis, environmental monitoring, and method development. The laboratory has implemented extensive equipment calibration and validation programs to ensure the integrity of the analytical results



30 Million
Units of finished goods sold in 2025.



≈ 30
Countries where collaborators in our supply chain are located.



> 300
Approved manufacturers and vendors in our supply chain.

Supply Chain

Our Responsible supply chain policy guarantees that environmental and social factors are incorporated throughout the entire life cycle of our products. Our supply chain consists of more than 300 manufacturers, service providers, and suppliers.

Facilities: Vita Health Products Inc. owns a 185,000 square foot manufacturing facility which serves as its head office and houses its manufacturing, packaging, laboratory, and administrative functions. The company also leases a 74,000 square foot Distribution facility. Both facilities are located in Winnipeg, Manitoba.

The manufacturing facility is primarily focused on production of solid dose over-the-counter drug and natural health products. It provides a comprehensive range of manufacturing, packaging, distribution, and on-site laboratory functions, and is capable of producing two-piece hard-shell capsules, coated and uncoated tablets, and powder mixtures. It also possesses the ability for modified release, bilayer, and functional coat formulations.

Our supply chain partners are varied, situated in different global locations and differing in scale. In the reporting period Vita Health Products Inc. procured approximately CAD **\$98 million** worth of components and raw materials from suppliers across the globe.

Responsible Materials Sourcing

At IVC Vita Health Products Inc. we view our suppliers as collaborators in promoting and enhancing our fundamental values throughout the supply chain. We recognize that their actions can significantly affect our standing with our employees, customers, community, and business partners. Along with the overall success of our company. IVC Vita Health is thus dedicated to choosing vendors that comply with the utmost standards of ethics and integrity across all aspects of their operations. We expect our suppliers to be accountable for managing risk in their operations and to hold their own suppliers accountable to the same high standards.

We aim to guarantee secure and equitable working conditions, as well as responsible handling of environmental and social concerns throughout our supply chain and will partner with our suppliers to enhance their capacity and/or refine their social and environmental practices.

The procurement of raw materials, including bulk dosage forms, ingredients, packaging materials, and sanitation supplies utilized in the fabrication of our products is subject to a stringent qualification and approval process that examines vendor adherence to our **Responsible Supply Chain Policy, Health Canada regulatory standards**, including the compliance of materials with preapproved specifications and **ESG risk** evaluation. This ensures not only the quality of our products, but that our supply chain acts in a socially and ethically responsible manner and actively engages in ensuring safe, healthy and fair working conditions.

Raw materials are sourced primarily, but not exclusively from North America, India, and China. In 2025, Vita Health Products Inc. catered to 33 clients with 168 distinct ship-to sites, delivering products to all provinces in Canada except for Prince Edward Island and the three territories. We maintain a small export operation equating to <2% of our annual revenue.

Supply chain mapping

To guarantee traceability and efficient monitoring of our due diligence efforts, Vita Health Products maintains internal documentation detailing the identity and locations of our tier 1 suppliers, including approved subcontractors' manufacturing sites, as well as direct suppliers of raw materials, packaging, and labour. In addition to tier 1, we collaborate with SEDEX, through which we are consistently advancing the mapping of our supply chain.

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Training and Capacity Building

At IVC Vita Health, we are dedicated to **enhancing our teams' capacity to execute and finish tasks effectively by increasing knowledge or cultivating and reinforcing skills**. During the reporting period, we completed an internally developed forced labour course and provided multiple training sessions on SOPs/policies related to forced and child labour in the supply chain.

In 2025, we completed the Forced Labour course initiated in the previous year. A total of 25 directly impacted employees, including senior management, directors and the procurement team participated in the internally developed self-paced program that addressed all elements of forced labour and child labour within manufacturing organizations. The training was designed following relevant national and international guidelines including the International Labour Organization, Walk free Global Slavery index and information from Public Safety Canada.

Training was also given to employees on our internal policies and procedures related to forced labour and child labour, including:

1. **Responsible Supply Chain Policy**
2. **The vendor approval and due diligence procedure**
3. **Supply Chain ESG risk review procedure**

The training programs aimed at enhancing our employees' comprehension of the actions, protocols, and tactics we have created and put in place to prevent, detect, or lessen these risks.

" **55%**
Women in management positions

Roles and Responsibilities

Responsibilities for supply chain and modern slavery risks are distributed among different roles and governance frameworks, involving specific employees in the Supply Chain department, the Executive Team, and the Board of Directors. Duties are explicitly outlined in our Responsible Supply Chain Policy and related procedures.

The **ESG Specialist** oversees all initiatives related to ESG, including the development and maintenance of required policies and procedures to ensure adherence to relevant laws and company standards. They are also tasked with conducting supply chain due diligence and guaranteeing suitable risk levels based on a justified strategy as outlined in our Vendor Approval & Due Diligence Procedure and accompanying Supply Chain ESG Risk Review Procedure.

The **Supplier Code of Conduct** at IVC Vita Health sets forth the essential expectations and standards that our suppliers must adhere to in our business dealings. It offers directives for labour standards, human rights, environmental conservation, and corporate morality, including stipulations on matters like equitable wages, anti-discrimination, health and safety.

Our commitment to Sustainable Development Goals

The Actions laid out in this report demonstrate our commitment to the United Nations 2030 Agenda for Sustainable Development and contribution towards the Sustainable Development Goals (SDGs) pointed out here.



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Our Supply Chain ESG Risk Review Procedure (ESGRRP)

This comprehensive procedure is informed by guidance provided by the Organization for Economic Co-operation and Development (OECD), the International Labour Organization (ILO) and the Canada Labour Code.

In 2025, we screened our supply chain partners in accordance with our due diligence procedure. Our screening process determines inherent risk based on industry, location, and company track record. At Vita Health Products Inc., ESG risk due diligence is an ongoing real-time process that identifies, assesses, and addresses risks as they arise.

Our proactive strategy reflects IVC Vita Health’s dedication to a robust, dependable, and responsible supply chain. Via Supplier Ethical Data Exchange (SEDEX), we achieved **53% mapping** of direct materials suppliers from whom we purchased in 2025 with 84 unique sites linked on the platform. In parallel, we progressed ESG risk due diligence in line with our Environmental, Social and Governance Risk Review Procedure (ESGRRP), conducting risk assessments through SMETA reports, EcoVadis and desktop reviews, achieving approximately **92% risk-assessment** coverage of total spend for suppliers from whom we purchased during the year. By analyzing audit reports, we evaluate our manufacturers’ compliance with human rights standards, specifically regarding forced labour and child labour.

In our 2025 internal risk evaluation conducted under our ESGRR program, palm oil and soy derivatives were identified as posing a risk to our supply chain with respect to forced labour and child labour. In response, IVC Vita Health Products Inc. reinforced a responsible sourcing strategy, where we encourage our suppliers of palm oil derived materials to provide valid certifications under the Roundtable on Sustainable Palm Oil (RSPO). Where full physical traceability is not feasible, we buy offset credits. We intend to define a similar approach for soy in the next year.

Remediation Measures

Collaboration on corrective actions and remediation measures is an essential phase in our due diligence process. To date, IVC Vita Health has not discovered any evidence of forced or child labour within our Supply Chain.

Assessing Effectiveness

We consistently evaluate our performance and the efficiency of our ESG risk assessment process. In 2025, we systemized SEDEX Members Ethical Trade Audits (SMETA) for our manufacturing facility in Winnipeg to take place every three years and established internal controls to guarantee that IVC Vita Health Product Inc consistently maintains a valid audit record. SMETA audits examine all elements of responsible business operations, emphasizing social factors such as human rights, equitable compensation, forced labour, and child labour.

We keep updating our strategy, policies, and procedures as we advance supply chain due diligence. In 2025, we revised our policies to permit the submission of compliance documents from organizations similar to SEDEX during the assessment phase, allowing flexibility for our suppliers to select an equivalent sustainability platform of their preference.



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" **> 600**
Employees in Canada

Our Supply Chain ESG Risk Review Procedure (ESGRRP) Continuation...

In 2025, we developed detailed **Key Performance Indicators (KPIs)** to assess our advancement in meeting our supply chain due diligence goals. Our KPIs are measurable, data-focused, and created to pinpoint gaps and opportunities for enhancement.

Communicating our progress & expectations

IVC Vita Health conveys its expectations regarding supply chain to all partners through general and targeted communiques and we report our progress with the ESG risk review program in official reports like this one. In 2025 we communicated our **supplier code of conduct** to all parties in our supply chain.

Vendor Approval and Due Diligence Procedure

In the reporting period we streamlined our vendor approval and due diligence procedure expanding pre onboarding risk assessment to include ESG considerations with emphasis on forced labour and child labour. The vendor compliance guide available for download on our website offers essential criteria for potential partners to qualify for business with IVC Vita Health. In 2025, it was revised to incorporate ESG criteria enshrined within our responsible supply chain policy.

Saliency Assessment

Prioritization of risks, particularly forced / child labour and human rights impacts, is categoric and based on their potential, severity and likelihood. Risk prioritization helps us focus our efforts on the more problematic areas of our supply chain.

Targets and Objectives

We have created detailed goals and targets linked to our KPIs. They aim to assess the efficiency of our due diligence/risk assessment process and general performance. Our targets are clearly defined according to risk classification and are projected for a period of four (4) years.

Ethics and Compliance Reporting

If you become aware of unethical behavior, concerning violations of laws, regulations, human rights report this directly to our Ethics and Compliance Hotline by one of two methods:

Online: <http://www.clearviewconnects.com/>

By Phone: 1-833-853-5342

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Actions taken to prevent and reduce the risks of forced labour and child labour in our supply chain in 2025.

IVC Vita Health’s ESG risk due diligence identified the agricultural sector specifically palm oil and soy derivatives as posing an elevated risk related to forced and child labour. Our internal controls and collaborations helps us address these risks.

In 2025, we conveyed our supplier code of conduct to all stakeholders in our supply chain and systemized SMETA4 audits for our manufacturing facility on a 3-year cycle. Detailed below are KPIs for our ESGRRP created to assist us in monitoring advancements in ESG risk due diligence.

- Percentage of suppliers that have confirmed receipt and acknowledged IVC Vita Health’s **supplier code of conduct** by risk category as a fraction of total annual spend.
- Percentage of suppliers with acceptable risk as a fraction of total annual spend.
- Percentage of employees trained on forced labour and child labour.
- Percentage of child labour and forced labour cases identified.
- Percentage of suppliers with a valid SMETA / EcoVadis Audits by risk category.
- Percentage of suppliers with active / pending corrective actions 6 months after initial notice of assessment.

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Policies and SOPs

Implemented a **vendor approval and due diligence policy** requiring ESG, financial and regulatory compliance due diligence prior to onboarding

Communicated our **supplier code of conduct** to all partners.

Ratified a new **Collective Agreement** for workers representation with Unifor Local 204a

Governance

Updated our **vendor compliance guide** with ESG expectations and expanded our **pre onboarding risk assessment procedure** to include ESG risk assessment with emphasis on forced labour and child labour.

Training

Completed our **Forced Labour course**. A total of 25 pertinent employees participated the internally developed self-paced program .

Management Systems

As part of a **gap analysis**, we updated our policies to allow evidence of compliance from organizations equivalent to SEDEX.

Obtained a **safe work certification** from **made safe** confirming our commitment to workers health and safety and confidence in our safety protocols.

Risk Assessment

Proceeded with ESG risk assessment as per our ESGRRP. In 2025, we achieved approx 92% **supplier ESG risk assessment** of total spend.

Our due diligence program identified **palm oil and soy derivatives** as posing high risk related to forced and child labour and a focused strategy was developed to address the risk.

Assessing Effectiveness

Systematized **SEDEX Members Ethical Trade Audits (SMETA)** for our manufacturing site in Winnipeg to occur on a three-year cycle

Defined **Key performance indicators** to evaluate our progress in achieving our supply chain due diligence objectives.

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Partnerships / Collaborations

We are committed to partnering with all our supply chain collaborators to develop the capacity and management frameworks needed to recognize and eradicate the risk of forced and child labour in our supply chain.

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Suppliers Ethical Data Exchange (SEDEX)

SEDEX plays an essential role in our due diligence procedure. Via their web platform, they offer data insights and tools that grant visibility into the operations of our suppliers and vendors, fostering transparency and accountability in supply chain performance. IVC Vita Health initially took part in SEDEX Members Ethical Trade Audits (SMETA) on a limited scale, specifically upon customer requests for our Canadian production site and overseas supplier facilities. We have upgraded our membership and included SMETA audits in our thorough ESG risk due diligence program.

Roundtable on Sustainable Palm Oil (RSPO)

Via our parent company, we are involved in the Roundtable on Sustainable Palm Oil, through which IVC Vita Health advocates for the adoption of sustainable palm oil products based on global standards. Although palm oil excipients used in our products represent a very small proportion of our overall raw material inputs and finished product composition. However, despite the minimal volumes, we recognize the heightened risk of forced labour and child labour within global palm oil supply chains. As part of our responsible sourcing strategy, we encourage our suppliers of palm oil-derived materials to provide valid certification under the Roundtable on Sustainable Palm Oil (RSPO). Where full physical traceability is not feasible due to the derivative nature or minimal quantity of the material, we purchase credits to support certified sustainable production.

Collective Bargaining Agreement - UNIFOR Local 204a

In the reporting period Vita Health Products Inc. Ratified a new Collective Agreement with validity from April 17, 2025, until April 16, 2028, with Unifor Local 204a, which is recognized as the sole and exclusive bargaining agent for all Canadian manufacturing facility employees engaged in the functions of manufacturing, packaging, warehousing, distribution, maintenance, and janitorial. This Collective Agreement outlines the terms and conditions of employment with its focus on wages, working conditions, and hours of work.

Made Safe Manitoba

In the reporting period, our manufacturing facility achieved certification through Made Safe Manitoba, a manufacturing-led health and safety association that provides training and certification to enhance workplace safety. This certification followed a comprehensive audit conducted in accordance with Manitoba’s Workplace Safety and Health Act, during which our policies, procedures, and emergency protocols were assessed for adequacy and compliance.



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Approval and Attestation

This Report received approval from the Board of Directors of IVC Vita Health Holdings Inc. on April 20, 2026. As per the stipulations of the Act, specifically Section 11, I confirm that I have examined the data included in the report for the entity or entities mentioned above. According to my understanding and having practiced due diligence, I confirm that the details in the report are truthful, precise, and complete in all material respects for the purposes of the Act, concerning the reporting year mentioned above.

IN WITNESS WHEREOF the authorized signing officer(s) has executed this report as of the effective date of the signatures set out below.

Authorized person: Stephanie Haverstick

Signature: *Stephanie Haverstick*
.....
Chief Executive Officer (CEO)

I have the authority to bind IVC Vita Health Holdings Inc.

WINNIPEG, April 20, 2026



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