



## **Forced Labour and Child Labour in Supply Chains Report**

**Fiscal Year 2025**

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### **1. ABOUT THIS REPORT**

This joint report has been prepared in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") by Freedom Pet Supplies Holdings Inc., covering its last financial year ending December 31, 2025.

The information provided in this report applies to Freedom Pet Supplies Holdings Inc. and its subsidiaries Freedom Pet Supplies Inc. and Trueman Distribution Ltd. (collectively, "FPS", the "Company", "we", "our" or "us"). On December 16, 2025, Freedom Pet Supplies Holdings Inc. acquired 100% of Trueman Distribution Ltd., and as of December 31, 2025, the Company has two wholly owned subsidiaries: Freedom Pet Supplies Inc. and Trueman Distribution Ltd.

This report outlines the key actions taken by the Company within the last financial year to prevent and reduce the risk of forced labour or child labour in its business and supply chain.

### **2. OUR COMMITMENT**

We are committed to respecting human rights. We view the protection of human rights as a fundamental corporate responsibility and have zero-tolerance for forced labour and child labour within our organization and our supply chains.

We strive to establish strong relationships with our employees, based on fairness, trust, and respect, and aim to create a work environment that is free from discrimination, harassment, and disrespectful behaviour. We are dedicated to providing equal opportunities for personal development, career growth, and ensuring healthy and safe working conditions for all employees.

### **3. PREVENTING AND REDUCING RISKS OF FORCED LABOUR AND CHILD LABOUR**

During our last financial year, under the objective of preventing and reducing the risks of forced labour and child labour in our operations and supply chains, we continued to conduct our business responsibly, applying measures that are proportional to the relatively low human rights risks in our activities and supply chain. That said, we implemented several meaningful enhancements to our compliance framework.

During fiscal year 2025, the Company implemented the following initiatives:

- Age verification procedures for potential hires, to prevent underage employment within our operations;
- A whistleblower and tip reporting mechanism, accessible by email and telephone, through which employees and stakeholders can confidentially report suspected instances of forced labour or child labour;
- Employee awareness posters displayed in our workplaces to educate staff on identifying and reporting indicators of forced labour and child labour; and
- Vendor compliance requirements, including contractual confirmation that our vendors and their subcontractors comply with all applicable laws prohibiting forced labour and child labour, including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

The informal partnerships we have established with our suppliers continue to benefit us by providing visibility on the identity of their manufacturing partners. This allows us to evaluate the level of risk such suppliers may represent as well as alignment with our core values, including the respect of labour standards and human rights. We have also continued to nurture strong relationships with our business partners, which are built on mutual trust and ongoing collaboration.

This report provides a description of these practices, as well as an overview of further measures we envisage, understanding that these initiatives are constantly evolving.

#### **4. ABOUT US & OUR SUPPLY CHAIN**

FPS is a sales and marketing company that distributes quality pet food and supplies, in addition to providing transportation and warehousing services to ensure efficient delivery across major Canadian cities.

Headquartered in Ontario, Canada, the Company currently employs approximately 150 people. Our primary focus is on the Canadian market, where we sell and distribute products. We also import goods from foreign countries to supply our wholesale distribution. On December 16, 2025, the Company acquired Trueman Distribution Ltd., expanding its distribution operations. As part of the integration process, the Company is conducting verification to confirm that activities are being carried out as expected,

and harmonization of Trueman Distribution Ltd.'s historical practices with Freedom Pet Supplies' established policies under the Act is a key element of that process.

The vast majority of our direct suppliers are located in Canada and the US. These suppliers account for approximately 90% of our purchases (about 55% in the US and 33% in Canada).

While we do not have complete visibility on all of our suppliers' sourcing, we are aware that our suppliers in Canada and the US predominantly source or produce their goods domestically. They also have sourcing or production in various other foreign countries, including China, Thailand, New Zealand, Mexico, and Brazil.

We mitigate our risks by fostering long-lasting relationships with well-established and renowned suppliers of the industry and we expect that all our suppliers conduct themselves in a manner that aligns with the standards contributing to FPS' respected reputation.

## **5. POLICIES AND DUE DILIGENCE PROCESSES**

During fiscal year 2025, the Company formalized its vendor compliance requirements by introducing contractual provisions requiring all vendors to confirm that they and their subcontractors comply with all applicable laws prohibiting forced labour and child labour, including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. This represents a significant step forward from the informal partnerships maintained in prior years and establishes a documented baseline for supplier compliance expectations.

We have continued to closely monitor and engage with our suppliers to maintain visibility on their activities and factories. We have continued to maintain partnerships with our direct suppliers, most of which have their own internal policies already in place to manage human rights risks in their supply chains. Through this partnership, we ensure that we have knowledge of the identities of their manufacturing partners.

To promote fairness, trust, and respect among our workforce, our Employee Orientation Manual outlines our commitment to creating a work environment free from discrimination, harassment, and disrespectful behaviour. The Employee Orientation Manual establishes a shared responsibility among all individuals, including managers and employees, to uphold principles of respect, non-discrimination, and productivity, with a zero-tolerance policy towards any form of discrimination based on protected grounds.

We also implemented a whistleblower and tip reporting mechanism accessible by email and telephone, providing employees and other stakeholders with a confidential channel

to report concerns related to forced labour or child labour in our operations and supply chains.

Given that FPS has not identified any instances of forced labour or child labour in its activities and supply chains, no measures were taken to remediate such instances or to remediate the loss of income to the most vulnerable families that may result from measures taken to eliminate the use of forced labour and child labour.

In the event that any allegations of forced labour or child labour in our operations or supply chains are discovered, we will take them seriously and conduct an investigation as soon as possible to address any potential risks.

## **6. RISK ASSESSMENT**

Based on the work conducted to date, no instances of concerns with respect to the Act have been identified and no definitive risk areas been identified.

Given that our direct suppliers are predominantly located in Canada and the United States, where labour standards are strictly enforced, we believe the risk that forced and child labour is used by our direct suppliers is generally low. Furthermore, the majority of our direct suppliers also supply major Canadian and US retailers, which have implemented their own processes aimed at addressing forced labour and child labour risks. We acknowledge that our direct suppliers operate their own factories and/or value chains which may extend to countries and regions potentially facing greater risk of forced labour and child labour, such as China and Thailand.

We have continued the informal process of identifying risks in our supply chains through discussions with our major direct suppliers and management's analysis of the collected information. This process has allowed us to determine that most of our major direct suppliers have their own internal policies in place to manage human rights risks.

Following the acquisition of Trueman Distribution Ltd. on December 16, 2025, we have begun integrating Trueman's operations into our supply chain assessment processes. A full review of Trueman's supply chain risk profile is planned for fiscal year 2026.

We continue to be actively committed to collaborating closely with our partners and suppliers and have started to engage with them on a more formal basis to monitor, assess and address any risk of forced labour and child labour in our shared supply chains.

## **7. TRAINING AND CAPABILITY BUILDING**

During fiscal year 2025, the Company implemented employee awareness posters in its workplaces to educate staff on how to identify indicators of forced labour and child

labour and how to report concerns through the newly established whistleblower mechanism.

The Company also introduced age verification procedures for potential hires as a preventive measure to protect against underage employment within its operations.

We intend to continue enhancing our training framework, including developing more formal training programs for select employees on identifying and responding to forced labour and child labour risks in our operations and supply chains.

## **8. ASSESSING THE EFFECTIVENESS OF OUR APPROACH**

The Company has taken meaningful steps in fiscal year 2025 to strengthen its approach to preventing forced labour and child labour. The introduction of vendor compliance requirements, whistleblower reporting mechanisms, employee awareness posters, and age verification procedures represent measurable enhancements to our compliance framework.

While we acknowledge that formal policies and procedures to systematically assess the effectiveness of these measures are still under development, we believe that the steps taken in 2025 establish an important foundation. We are committed to continuing to build on this framework and to developing more structured effectiveness assessment processes in the coming year.

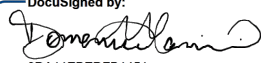
We also remain committed to sourcing products from reputable and long-term business partners and to fostering transparency from our suppliers as a key means of promoting ethical practices throughout our supply chain.

## **9. APPROVAL AND ATTESTATION**

This report was approved by the Board of Directors of Freedom Pet Supplies Holdings Inc. on May 11, 2026, pursuant to subparagraph 11(4)(b)(ii) of the Act and constitutes the joint report for the entities listed in the first section of this report for the financial year ending December 31, 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed in the first section of 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 indicated above.

I have the authority to bind Freedom Pet Supplies Holdings Inc.

DocuSigned by:  
  
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Full name: Domenic Mancini

Title: Chair of the Board

Date: May 11, 2026