



Forced Labour and Child Labour Report Canada - 2024

INTRODUCTION

PRIMED Medical Products Inc. (PRIMED) has prepared this report in compliance with Part 2 of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (“Act”). This report relates to the 2024 fiscal year ending December 31, 2024 (the “reporting period”).

This report details the measures PRIMED took during the reporting period to prevent and reduce the risk of forced labour or child labour in our business and supply chain.

OUR BUSINESS AND SUPPLY CHAIN

PRIMED Medical Products Inc., the reporting entity under this Act, is a Canadian corporation located in Edmonton, Alberta. PRIMED operations include commercial sales, marketing, quality, regulatory compliance, supply chain and logistics services, and information technology support.

Founded in 1995, PRIMED has grown into a global enterprise with wholly owned manufacturing facilities in Canada and Asia, supported by offices across Asia and North America. Renowned for our high-quality products, PRIMED’s medical products are used in hospitals across Canada and healthcare facilities worldwide. We offer branded, co-branded, and private label products and services to our customers and international partners.

PRIMED sells medical personal protective equipment in Canada and purchases goods from its wholly owned subsidiaries and other manufacturing suppliers outside Canada. PRIMED’s wholly owned subsidiaries source raw materials for manufacturing from suppliers in Asia and North America.

Risks of Forced and Child Labour in the Operation and Supply Chain

Risk related to forced labour and child labour is inherent to the apparel and textile sector/industry, the geographical locations of our suppliers, and the types of products we source. Despite these challenges, PRIMED have assessed the risk of forced labour and child labour within the supply chain as low, owing to the policies and procedures we have implemented and the partnerships we have fostered with suppliers and partners.

Looking ahead to 2025, PRIMED is committed to further strengthening and refining our risk assessment and due diligence processes to ensure even greater effectiveness in identifying and addressing potential risks within the supply chain.

CONTROLS

Policy Statements

Our Forced Labour and Living Wage Statement aligns with internationally recognized standards, including the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ten Principles of the United Nations Global Compact, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. It continues to be a beacon for ensuring workplace equity and diversity.

PRIMED's Forced Labour and Living Wage statement is available externally on our website [HERE](#).

The Forced Labour and Living Wage Statement, along with an Environmental, Social and Governance Statement, Whistle Blowing and Health and Safety policy, reinforces a commitment to ethical business practices. Together, these policies reflect PRIMED's dedication to fostering social equity and creating a workplace that embraces diversity, equal opportunities, fair labour practices, safe working conditions and respect for human rights for all employees. We require our suppliers and employees to comply with these standards.

In 2024, we strengthened the Whistleblowing policy to include an external contact for our employees to report issues such as allegations of forced labour and child labour confidentially and without fear of retaliation.

Employee Hiring Process

PRIMED maintains a strict policy against the employment of individuals under the age of eighteen. This policy aligns us with the forced labour and child labour standards outlined in international, federal, state/provincial laws and regulations. We have a comprehensive hiring process in place, which is also implemented by our wholly owned manufacturing facilities and global offices.

PRIMED extends this policy to suppliers and partners and reviews the recruitment and labour practices to verify that they adhere to the same standards and are not engaging in forced labour and child labour. These reviews are a key component of due diligence efforts to promote ethical labour practices and uphold human rights across all areas of our business.

Employee Code of Conduct

In 2024, we updated the Employee Code of Conduct to reflect a continued commitment to fostering an inclusive and flexible organizational culture, grounded in our core values of collaboration, respect, agility, fearlessness, trustworthiness, and innovation. The employee code of conduct outlines the principles and expectations that guide employee behaviours to ensure all individuals uphold lawful and ethical standards, act in ways that reflect these values, build trust and confidence and report concerns or suspected violations of the code. All directors, officers and employees are expected to operate in full alignment with this policy.

Sourcing Practices/Supplier Qualification

Supplier pre-qualification remains the cornerstone of PRIMED's responsible sourcing program. All prospective suppliers undergo a qualification process to determine their suitability to be an approved PRIMED supplier. The process includes an assessment of their business profile, quality assurance practices, regulatory compliance, and policies related to the prevention of forced labour and child labour, along with other key ethical business practices. Techniques such as on-site audits and documentation reviews are employed to verify whether the criteria are met. If gaps are identified, PRIMED works collaboratively with the supplier to ensure compliance.

The supplier qualification process is reinforced by the Supplier Code of Conduct, which is now integrated into the Request for Proposal process. This code sets clear expectations for suppliers to uphold worker rights, prohibits forced labour and child labour, human trafficking, as well as any form of discrimination, abuse, harassment, intimidation, or violence in the workplace. PRIMED remains committed to fully implementing the Request for Proposal process across the supply chain in 2025.

In addition, we finalized a Vendor Attestation at the end of 2024. This policy requires suppliers to formally affirm their adherence to responsible business practices in the areas of environmental sustainability, social responsibility, and corporate governance. Suppliers must attest to compliance with the Canadian Forced Labour and Child Labour Act. They are required to confirm that they have policies, processes and governance structures in place to identify, reduce and prevent the risk of forced labour and child labour in the supply chain. Full implementation of this attestation process is scheduled for the first quarter of 2025.

Social Compliance Audits

Responsible sourcing audits are required for our suppliers. These audits assess areas such as child labour, forced labour, health and safety standards, working hours, overtime practices, and consecutive days of work.

Suppliers are required to submit copies of comprehensive third-party audit reports detailing the findings, identified non-conformities, and recommended corrective actions. This report ensures that established standards are upheld and supports the continuous improvement of labour and workplace conditions. PRIMED reserves the right to terminate agreements where a supplier fails to take part in this process.

In addition to third-party audits, we require suppliers to complete annual self-assessments. These assessments must be supported by documentation demonstrating compliance with PRIMED's standards in the areas of child labour, forced labour, occupational health and safety, working hours, overtime, and scheduling practices.

These layers of accountability are essential to maintaining integrity within our supply chain and ensuring alignment with ethical business practices.

EMPLOYEE TRAINING

PRIMED continued in 2024 to expand its training initiative on forced labour and child labour across the organization to strengthen awareness and understanding of this critical issue. These sessions addressed the legal obligations outlined in the Act and focused on due diligence and reporting for suspected cases within the supply chain.

PRIMED remains committed to conducting this training on an annual basis to educate employees on upholding human rights and ethical standards throughout all operations and supply chain.

REMEDIATION MEASURES

During the reporting period, PRIMED did not identify any instances of forced labour or child labour and therefore did not undertake any specific remedial action or provide loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

ASSESSMENT OF EFFECTIVENESS

PRIMED acknowledges its responsibility to continue assessing the effectiveness of its measures to identify and mitigate the risks of forced labour and child labour in its operations and supply chain. We review the effectiveness of these actions by evaluating the results of suppliers' self-assessment questionnaire, third-party audits and their associated corrective actions. We use these tools to monitor our suppliers' performance and to determine if there are any risks with continuing the relationship with the supplier(s).

MOVING FORWARD

At the end of 2024, PRIMED recognized the need for a strategic Environmental, Social and Governance (ESG) road map to guide the implementation of ESG initiatives. To support this effort, the necessary expertise was engaged to ensure an effective approach was developed.

This roadmap will serve as the foundational tool for shaping the ESG policies and actions throughout 2025 with a particular focus on accessing and mitigating the risks of forced labour and child labour within our operations and across the supply chain.

APPROVAL

This report was approved by the board of directors of PRIMED Medical Products Inc. on

26 May 2025

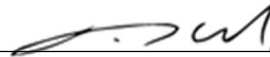
In accordance with the requirements of the Act, and in particular section 11(4)(a) thereof, I attest that I have reviewed the information contained in the report for PRIMED Medical Products Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind PRIMED Medical Products Inc.

David Welsh
Full name

May 26, 2025
Date

CEO & Chairman
Title


Signature