



Forced and Child Labour Report Canada - 2025

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 2025 fiscal year ending December 31, 2025 (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, China, and Laos, 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

Risks related to forced labour and child labour are inherent in 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 2026, 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 supply chain risks.

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, Whistleblowing, Employee Code of Conduct, 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.

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

Our Employee Code of Conduct reflects 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 on the prevention of forced and child labour, as well as 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 2026.

Our Vendor Attestation 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.

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 to expand its training initiative on forced labour and child labour in 2025, strengthening awareness and understanding of this critical issue across the organization. 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 annually to ensure employees uphold human rights and ethical standards throughout all operations and supply chain activities.

In 2025, PRIMED advanced this commitment by delivering formal awareness training on Bill S-211 (Fighting Against Forced and Child Labour in Supply Chains Act) to support organization-wide compliance. Key actions included:

- **Structured Training Program** – Developed formal training materials, including a presentation and recorded session, to support consistent, self-paced learning across the organization.
- **Delivery** – Implemented a hybrid approach, with self-paced training and facilitated in-person sessions to ensure accessibility across locations.
- **Assessment** – Required completion of a knowledge assessment to reinforce understanding of legal obligations and reporting expectations.
- **Communications** – Supported completion through a series of mandatory communications, including initial invitations, reminders, and follow-ups.
- **Onboarding Integration** – Embedded the training into the onboarding process and designed it for repeatable annual delivery.

The next training cycle is planned for 2026 and will focus on reinforcing awareness and reviewing any reported incidents to support continued compliance and organizational vigilance.

REMEDATION 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 determine whether there are any risks in continuing the relationship with the supplier(s).

MOVING FORWARD

PRIMED continues to advance its Environmental, Social and Governance (ESG) journey, building on foundational work initiated in prior years to strengthen governance, accountability, and integration across the organization.

Progress has been made in formalizing key ESG components, including policy development, supplier expectations, and employee awareness initiatives. PRIMED is progressing toward a more structured and integrated ESG approach that aligns with business priorities and regulatory requirements.

As part of this evolution, PRIMED is enhancing its approach to identifying, assessing, and mitigating risks related to forced and child labour across its operations and supply chain. This includes continued refinement of due diligence processes, increased supplier engagement, and the use of tools such as supplier attestations, audits, and training to reinforce expectations and accountability.

PRIMED remains focused on strengthening its ESG framework in a practical and scalable way, ensuring that policies, processes, and behaviours across the organization consistently support ethical business practices and respect for human rights.

APPROVAL

This report was approved by the Board of Directors of PRIMED Medical Products Inc. on

25 May 2026

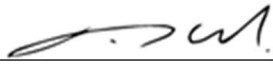
In accordance with the requirements of the Act, and in particular section 11(4)(a) thereof, I attest that I have reviewed the information contained in the report for PRIMED Medical Products Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report 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

25 May 2026
Date

CEO & Chairman
Title


Signature