

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT REPORT

INTRODUCTION

This report is prepared by BCP VI Trillium Holdings Limited (the “Company”), together with its subsidiaries, (collectively “Trimco Group” or the “Group”) in accordance with Section 11(1) of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). It outlines the measures taken from January 2024 to December 2024 to prevent slavery, servitude, forced or compulsory labour, and human trafficking within our business operations or supply chains. Additionally, this covers ongoing business action plans and initiatives from 2025 onwards.

BCP VI Trillium Holdings Limited serves as the parent company of Trimco Group specializing in the manufacturing and provision of labels, tags, accessories and packaging solutions for garment factories. The Group operates with a steadfast commitment to ethical business practices, ensuring respect for human rights and decent working conditions across all levels.

Trimco Group maintains operations in following countries and jurisdictions: Bangladesh, Canada, China, Denmark, Germany, Guatemala, Hong Kong, India, Indonesia, Kenya, Mexico, Netherland, Norway, Pakistan, Romania, Singapore, Sweden, Thailand, Turkey, United Kingdom, United States, and Vietnam.

The Group’s commitment to ethical business practices is outlined in its s Code of Business Conduct & Ethics, Human Right Policy, Supplier’s Code of Conduct as well as internationally recognized standards and certifications such as, BSCI, SEDEX/SMETA, which were globally implemented across the Group in 2023. The entire Group remains fully aware of, and dedicated to its legal and moral responsibilities to prevent modern slavery, child labour, human trafficking and other human rights violations.

BCP VI Trillium Holdings Limited, alongside the Group continuously strikes to enhance its practices in the ongoing fight against modern slavery and human trafficking, as well as all aspects of ethical business practices.

The Group is dedicated to conducting its business ethically and responsibly, ensuring that our operations uphold and protect human rights. We strike to:

- a. Eliminate discrimination in employment;
- b. Prohibit modern slavery, including child and forced labor; and
- c. Eradicate harassment and physical or mental abuse in the workplace.

We are actively embedding these principles into our core business activities, including training, communications, contracts and due diligence processes, as appropriate. Our commitment extends to our interactions with our key suppliers and business partners, both in Canada and worldwide.

SUPPLY CHAIN STRUCTURE, SELECTION AND MONITORING

The supply of goods, services and products to the Group's business units is managed by the local subsidiaries, with support from the Group's procurement team. The procurement team and ESG teams oversee Corporate Social Responsibility (CSR) efforts, assisting local teams in selecting business partners who align with the Group's ethical standards.

While the Group's primary business partners are based in Europe and North America, it sources goods, services and raw materials- such as textiles and ribbon from China and other parts of Asia, including India and Bangladesh. Ethical practices within the supply chain are a fundamental expectation for the Group's business partners.

The Group works closely with its business partners to uphold and implement its' core ethical values, including efforts to combat modern slavery, child labour, human trafficking and other human rights violations.

INTERNAL POLICIES, PROCEDURE, RISK ASSESSMENT AND CONTRACTUAL CONTROLS

The Group is committed to upholding and promoting human rights as outlined in internationally recognised human rights instruments. We acknowledge the fundamental importance of treating all stakeholders within our value chain with dignity, respect, and equality. Our commitment includes strict adherence to applicable national and international laws, including the following key human rights frameworks:

- United Nation Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- The International Labour Organisation's (ILO) Declaration of the Fundamental Principles and Rights at Work and the ILO Core Conventions
- International Labour Organisation (ILO) Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- The UN Guiding Principles on Business and Human Rights and the associated Gender Dimensions of the UNGPs
- United Nations Convention on the Rights of the Child
- The OECD Guidelines for Multinational Enterprises, and the OECD Due Diligence Guidance for Responsible Business Conduct

Through our continued commitment, the Group strives to ensure ethical business practices and the protection of human rights across all operations.

We also employ industry-leading tools such as SMETA SEDEX Version 6.1 and BSCI 2023 to uphold responsible business practices. These frameworks reinforce our unwavering commitment to safeguarding human rights across all aspects of our operations.

SEDEX

Management Systems & Code Implementation
 Freely chosen employment
 Health and Safety
 Child Labour and Young Workers
 Wages and Benefits
 Working Hours
 Discrimination
 Harsh or Inhumane Treatment
 Environment

BSCI

PA 1: Social management systems and cascade effect
 PA 2: Workers involvement and protection
 PA 3: The rights of freedom of association and collective bargaining
 PA 4: No discrimination
 PA 5: Fair remuneration
 PA 6: Occupational health and safety
 PA 7: No child labour
 PA 8: Decent working hours
 PA 9: Special protection for young workers
 PA 10: No precarious employment
 PA 11: No bonded labour
 PA 12: Protection of the environment
 PA 13: Ethical business behaviour

The Group is committed to conducting business in a legal, responsible and sustainable manner that upholds ethical integrity while prioritizing the well-being of our people, communities, stakeholders and natural environment. We recognize that the primary risks related to modern slavery exist within our business partnerships, particularly among suppliers operating in higher risk jurisdictions.

A significant part of the Groups’ supply chain is managed through our global headquarter procurement team and legal and compliance department in Hong Kong. Centralizing the purchasing of goods and services enhances oversight and ensures that supplier selection and procurement processes are conducted by a team well-trained in ethical and responsible purchasing.

Since 2024, major suppliers are required to comply with the Group’s vendors onboarding standard of procedure, which include due diligence assessment. Additionally, major suppliers must sign a supply contract and adhere to the Supplier’s Code of Conduct to be eligible to supply any goods or services to the Group. Similar practice and exercises have been gradually extended to all suppliers since 2025.

Furthermore, our suppliers are expected to comply with international standards such as BSCI, SEDEX/SMETA. Suppliers who refuse or fail to meet these standards may face termination of their business relationship with the Group. To ensure continuous compliance, regular audit and inspections are conducted by , the Group or independent third parties, assessing adherence to international Environmental, Social and Governance (ESG) standards, including human rights.

GROUP POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The Group’s maintain a Zero-Tolerance policy towards any violation of human rights, including but not limited to modern slavery, child labour and human trafficking. The Group is committed to operating in strict compliance with legal requirements while promoting the highest standards of integrity. Through continuous communication, we share and reinforce our values with employees,

business partners and suppliers across all locations to maintain strong awareness of ethical responsibilities.

As part of our ongoing compliance and monitoring effort, we have established the Trimco Supplier Code of Conduct incorporating the amfori BSCI Code of Conduct, which aligns with international labour regulations. These frameworks encompass the Universal Declaration of Human Rights, the Children's Rights and Business Principles, UN Guiding Principles for Business and Human Rights, ensuring our dedication to responsible and ethical business practices.

The Group maintains a strong relationship with its supply chain, fostering effective communication with business partners across various locations, while respecting local cultures. We continuously enhance our processes to promote transparent and fairness in the workplace, ensuring that employees, enable the grow alongside the Group.

In addition to ethical business practices, the Group actively supports and contributes to local communities, reflecting our core values and vision. As part of our commitment to Responsible and Ethical Purchasing, we integrate Corporate Social Responsibility (CSR) and Sustainability principles into our operations.

Our CSR reports are published on the Trimco Group website (<https://www.trimco-group.com>), providing clear guidance on our ethical standards and reinforcing expectations for business partners including suppliers. The Group requires business partners to uphold these principles by minimizing environmental impact, promoting sustainable development and maintaining ethical practices.

The Group's policies require business partners to adhere to the following ethical and operational standards:

- **Human Rights Protection:** Recognize and respect internationally proclaimed human rights.
- **Ethical Supply Chain Standards:** implement internationally recognized ethical policies, such as BSCI, SEDEX/SMETA, and other human rights and labour management principles.
- **Prohibition of Exploitation:** Strictly forbid child labour, slavery, forced labour and human trafficking.
- **Workplace Safety:** Ensure a secure and healthy working environment for all employees.
- **Zero-Tolerance for Corruption:** Prohibit all forms of corruption including extortion, bribery, and influence peddling.
- **Fair Labour Condition:** Guarantee fair labour practices, ensuring employees receive regular salaries per employment contracts and legal requirements.
- **Anti-Discrimination Measures:** Prevent discrimination based on race, gender, age, ethnicity, political opinion, or origin.
- **Training and Transparency:** Provide ongoing training and communication to employees, fostering ethical awareness and transparency within the Group.
- **Sustainability Commitment:** Continuously implement programs that promote responsible and sustainable growth.

Additionally, the Group also maintains a whistleblowing mechanism, allowing employees and external stakeholders to report concerns internally or externally to the Legal & Compliance department. This procedure ensures that individuals can report suspected illegality, unethical behavior, or other serious wrongdoing, including potential cases of modern slavery.

DUE DILIGENCE, MANAGEMENT OF MODERN SLAVERY RISK

The Group collaborates with our business partners, primarily suppliers, to uphold our global policies through audits conducted by internal compliance teams, or international recognized independent auditors. These audits assessed whether business partners adhere to the Group's ethics and human right principles.

To complement internal processes, independent assurance provided conduct audits that evaluate compliance levels among business partners and highlight areas for improvement. To ensure audit effectiveness, the Group employs a structure audit methodology comprising the following key elements:

- Compliance with the Group's ethical standards and policies.
- Evaluation of business partners against corporate social responsibility (CSR) benchmarks including BSCI, SEDEX/ SMETA, or SA8000, OEKO-TEX, BLUESIGN, FSC, and GRS, as well as alignment with international auditing standards.

The methodology allows the Group to optimize audit operations by defining and prioritizing assessments. If an audit reveals non-compliance with the Group's ethical requirements, the business may be given a timeframe to implement necessary corrective actions. In severe cases, the Group reserves the right to terminate the business relationship and immediately remove the partner from our supply chain.

MONITORING EFFECTIVENESS

The Group conducts regular internal and external audits at business partners premises to ensure compliance and prevent serious breach. In 2024, no cases related to modern slavery were reported or raised through audits conducted by our internal compliance & ESG teams or external auditors.

Through our Product DNA® monitoring system, we actively oversee our own sites and suppliers to identify and address human and labor rights risks. This includes tackling issues related to discrimination, equal opportunity, fair compensation, the right to organize collective bargaining, and freedom of association.

Human Rights Due Diligence Process

All our factory sites have established systems to comply with BSCI, SMETA SEDEX, local regulations, and customer requirements. Standard Operating Procedures (SOPs) are in place across all factory or production sites.

Additionally, all factory sites are required to register their social due diligence certificates both for themselves and their suppliers within our inhouse Product DNA® platform. We assess human rights related issues at each site through Product DNA®, utilizing the tools provided by BSCI and SMETA SEDEX for in-house and suppliers assessments and selections.

Our internal compliance and ESG teams conduct regular internal audits and assessments, including reviews of both new and existing suppliers. If any factory or production site is assessed with a 'C' rating or lower in any BSCI category, or receives NC/OBS findings in SMETA/SEDEX, a corrective action plan is mandated to ensure improvement and compliance.

PROVIDE NECESSARY TRAINING AND COMMUNICATION WITHIN THE GROUP

Ensuring that all staff are aware of and understand the risks associated with modern slavery and human trafficking is essential. Employees must be able to identify signs of exploitation and know the appropriate actions to take if such activities are suspected. To support this, the Group will, provide comprehensive training opportunities at suitable levels across all global operations.

FURTHER STEPS AND MONITORING

The Group recognizes the pervasive and harmful nature of modern slavery and understands that measures to address related risks must be dynamic. As part of its ongoing commitment, the Group will continuously monitor operational practices, evaluate its approaches and strengthen its efforts in the years ahead.

THE GROUP HAS IDENTIFIED THE FOLLOWING AS KEY ACTIONS FOR 2025:

- **Enhancing staff awareness-** Providing necessary training within the organization. A series of human rights trainings sessions have been planned and initiated for 2025.
- **Strengthening compliance approaches-** Developing and identifying internationally recognized tools to ensure continuous and effective monitoring of the supply chain.
- **Improving procurement and vendor selection-** Reviewing and refining the vendor's selection and onboarding process to enhance supply chain risk management.
- **Maintaining close communication with business partners-** Regularly promoting compliance awareness to foster strong ethical practices.

In accordance with the requirements of the Act, particularly Section 11, 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 presented in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year specified above.



Amy Chuk Kwan, WAN

Group Chief Executive Officer

30 May 2025

I have the authority to bind Trimco Group