

This Statement explains the steps taken by Broder Bros., Co. dba alphabroder, and its wholly owned subsidiary alphabroder Canada ULC, (collectively “alphabroder”) during the 2023 financial year to prevent and reduce risk that forced labour or child labour is used in alphabroder’s supply chain.

This Statement is provided in response to Canadian law requiring the submittal of an annual report to the Minister of Public Safety. This Statement follows the format of the questionnaire set by the Ministry.

Questions marked with an asterisk (*) are mandatory.

1. *Legal name of reporting entity:

Broder Bros., Co. dba alphabroder and alphabroder Canada ULC

2. *Financial reporting year:

2023

3. Business number(s) (if applicable):

Broder Bros., Co. 38-1911112
Alphabroder Canada ULC BC0990458

4. *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?

- Yes
- No

4.1 *If yes, indicate the applicable law(s). Select all that apply.

- The United Kingdom’s *Modern Slavery Act 2015*
- Australia’s *Modern Slavery Act 2018*
- California’s *Transparency in Supply Chains Act***
- Other, please specify:

5. Which of the following categorizations applies to the entity? Select all that apply. (Required)

- Listed on a stock exchange in Canada
- Canadian business presence (select all that apply):**
 - Has a place of business in Canada**
 - Does business in Canada**
 - Has assets in Canada**
- Meets size-related thresholds (select all that apply):
 - Has at least \$20 million in assets for at least one of its two most recent financial years
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years**
 - Employs an average of at least 250 employees for at least one of its two most recent financial years**

6. For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply.

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- Other, please specify:**

Promotional Products Supplier and Decorator of soft-goods and hard-goods

7. *In which country is the entity headquartered or principally located?

United States

7.1 If in Canada: *In which province or territory is the entity headquartered or principally located?

Annual Report

Reporting for entities

1. *What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.

- Mapping activities**
- Mapping supply chains**
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains**
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains**
- Developing and implementing an action plan for addressing forced labour and/or child labour**
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily**
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour**
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains**
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour**
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains**
- Developing and implementing child protection policies and processes**
- Developing and implementing anti-forced labour and/or -child labour contractual clauses**
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists**
- Auditing suppliers**
- Monitoring suppliers**
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour**
- Developing and implementing grievance mechanisms**

- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour**
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour**
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period
- Other, please specify:

2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

We are committed to preventing and reducing the risk that forced labor or child labor is used at any of the factories involved in the production of goods imported into Canada by alphabroder.

To protect human rights, we address the risks of modern slavery and human trafficking throughout our operations, including the policies outlined in Question 7 and the training programs outlined in Question 16.

We maintain in the United States and Canada an anonymous reporting system that can be used by associates and anyone else to report concerns. There are posters at all of our 11 facilities in the United States and Canada with the contact information. In addition, we require all of our overseas factories that supply our apparel products to implement an anonymous reporting system for their associates. For overseas hard goods factories, we have begun a rollout of an anonymous reporting system for associates.

We continue to develop anti-forced labor and child labor contractual clauses for our suppliers and business partners which require compliance with all applicable laws and regulations and respect internationally recognized labor standards.

3. *Which of the following accurately describes the entity's structure?

- Corporation**
- Trust
- Partnership
- Other unincorporated organization

4. *Which of the following accurately describes the entity's activities? Select all that apply.

- Producing goods (including manufacturing, extracting, growing and processing)**
 - in Canada
 - outside Canada
- Selling goods**
 - in Canada
 - outside Canada
- Distributing goods**
 - in Canada
 - outside Canada
- Importing into Canada goods produced outside Canada**
- Controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada**

5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).

Alphabroder's apparel and hard good products help our customers build brands, champion causes and acknowledge achievements. Our customers consist of promotional product distributors, athletic team dealers, screen printers, embroiderers, online retailers and thousands of other businesses. We have ten distribution and production facilities in the United States and one in Richmond Hill, Ontario, Canada. We comply with all US and Canadian labor laws and we are confident we have no forced labor or child labor employed in any of our eleven facilities in the United States and Canada.

To provide our products and services our supply chain does consist of apparel and hard goods product suppliers from 13 countries. We do an initial assessment when we contract with a factory and we do an ongoing annual assessment of each of our factories on an annual basis. We have no direct suppliers that use forced labor or child law.

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?

- Yes**
- No**

6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.

- Embedding responsible business conduct into policies and management systems**

- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

All suppliers within our network must perform due diligence on their supply chains. Our vendors must comply with social accountability statement and policy, which includes provisions on forced labor, prison labor, forced child labor, and compulsory labor.

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- Yes, we have started the process of identifying risks, but there are still gaps in our assessments.**
- No, we have not started the process of identifying risks.

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.

- The sector or industry it operates in**
- The types of products it produces, sells, distributes or imports**
- The locations of its activities, operations or factories**
- The types of products it sources**
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers**
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour**
- The use of forced labour**
- The use of child labour**
- None of the above
- Other, please specify

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing**
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

Raw material processing and Production facilities (assembly & finishing) all carry a risk of forced labor or child labor. Conducting third-party assessments is a critical step in ensuring ethical and responsible supply chains. These assessments address potential human rights and social issues. By involving independent experts, we gain valuable insights of our supplier partners.

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.

- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.**

11.1 *If yes, which remediation measures has the entity taken? Select all that apply.

- Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- Compensation for victims of forced labour or child labour and/or their families
- Actions to prevent forced labour or child labour and associated harms from reoccurring
- Grievance mechanisms
- Formal apologies
- Other, please specify.

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

Not applicable as we have not found any.

13. *Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?

- Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any 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.**

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit).

Not applicable.

15. *Does the entity currently provide training to employees on forced labour and/or child labour?

- Yes**
- No

15.1 *If yes, is the training mandatory?

- Yes, the training is mandatory for all employees.
- Yes, the training is mandatory for employees making contracting or purchasing decisions.
- Yes, the training is mandatory for some employees.**
- No, the training is voluntary.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

We have conducted internal and supplier partner training of our Social Accountability Policy statement which covers discriminatory practices, Harrassment or Abuse, Forced or Compulsory Labor, Child Labor, Human Trafficking and Slavery, Freedom of Association and Collective Bargaining.

17. *Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

- Yes**
- No

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply.

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour**
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization's actions**
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators
- Other, please specify.

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

We continue to make progress in evaluating and reducing the risk that forced labour or child labour may occur in our supplier chain or otherwise be used at any step of the production of goods by alphabroder or goods imported into Canada by alphabroder. However, we also recognize that this is an ongoing and evolving process that requires continuous improvement and collaboration. We are committed to reviewing and updating our policies and practices, engaging with our stakeholders, and reporting on our performance and impact. alphabroder management continues to assess our effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chain.

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 entity or entities listed above. 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. The Report was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the Board of Directors of Broder Bros., Co. In my capacity as a Director of Broder Bros., Co., and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

I have authority to bind Broder Bros., Co.



Daniel F. Pantano
Director; President & CEO
April 23, 2024