

FIGHTING AGAINST FORCED AND CHILD LABOUR REPORT

For the Financial Year ending 31st December 2023

This document constitutes Conair Consumer Products ULC's ("Conair") report prepared pursuant to Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ending December 31, 2023 (the "Reporting Period"), and outlines the steps taken by Conair to prevent and reduce the risk that forced and child labour are used in the production of goods or of goods imported into Canada by Conair.

STRUCTURE, ACTIVITIES & SUPPLY CHAINS

Conair is a leading wholesaler and distributor of personal care appliances, small kitchen appliances and cookware, and hairbrushes and hair accessories to the Canadian marketplace. Conair is located in Woodbridge, Ontario, and is incorporated under the laws of the Province of Nova Scotia. The company was founded in 1984 and is a wholly owned subsidiary of Babyliss Holding of France, which is owned by Conair LLC, ("Conair" or "Company") located in the United States.

Conair purchases most of their products from unrelated manufacturers located in Asia for resale to its customers in Canada. In addition, some personal care appliances are manufactured by a group company in Italy.

For purchases from unrelated manufacturers, Conair contracts with Continental Conair Limited ("CCL") under a Buying Agency Agreement ("Agreement") for the performance of buying agent functions relating to our supplier base in Asia. Under this Agreement, CCL oversees the manufacturing process including regularly reporting to Conair concerning manufacturers' activities, credibility, and adherence to our Workplace Code of Conduct, among other duties as outlined in the Agreement.

FORCED AND CHILD LABOUR RISKS IN OUR SUPPLY CHAIN

During the fiscal year, Conair took several measures to identify and address the risks of forced or child labour within its operations and supply chain. The company conducted thorough assessments of its supply chain to identify any potential areas where forced or child labour may be present. The company also implemented and maintains robust supplier vetting processes to ensure that suppliers adhere to labour laws and regulations, with a specific focus on preventing forced and child labour. Additionally, the Company maintained clear policies and procedures that aim to prevent, reduce and address instances of forced or child labour and established channels for reporting and addressing any concerns related to these issues.

By taking these proactive measures, Conair demonstrated its commitment to preventing and addressing forced and child labour within its operations and supply chain.

Conair is committed to having transparent arrangements with suppliers, the majority of whom are based in Asia and most of which we have been working closely with for many years. They are monitored by our management and regularly audited to ensure their compliance with Conair's Workplace Code of Conduct; an integral part of the Factory Certification Manual. Pursuant to our Workplace Code of Conduct, Conair does not allow the use of forced or child labour for any portion of the manufacture of goods or component purchased.

POLICIES AND DUE DILIGENCE PROCESSES

The Company has policies and procedures to help prevent and reduce risks of forced or child labour in our operations and supply chain, each of which apply to Conair.

Workplace Code of Conduct

Conair has in place a Workplace Code of Conduct which prohibits the purchase of any product(s) and/or services from any supplier who engages in or supports the use of child labour or forced labour. It also prohibits suppliers from requesting that employees lodge "deposits" or identity papers upon commencing employment and includes provisions with respect to working conditions including anti-discrimination, working hours, and health and safety for workers. Conair's suppliers are required to sign a factory certification agreement acknowledging they have read and understood the Conair Factory Certification Manual, which includes the Workplace Code of Conduct, and agrees to comply with the Workplace Code of Conduct.

Our Workplace Code of Conduct and processes are regularly reviewed in line with local laws, standards, and other governing bodies such as the Occupational Health & Safety Management (OHSAS18001), Environmental Protection Management (ISO14001), Quality Management (ISO9001) and Fire Safety Management.

Audits

Conair is committed to ensuring it and its supply chain adhere to ethical practices. The Company has a dedicated Audit Team that performs planned and unscheduled rigorous factory audits to ensure its standards are met. The Company also arranges for third party audits to be conducted, which are based on the labour standards of the International Labour Organization (ILO), the UN Charter for Human Rights, Ethical Trading Initiative (ETI) Base code and relevant national regulations.

Conair aims to support suppliers in maintaining high standards of compliance and is committed to preventing human trafficking, slavery and child labour. Where circumstances fall short of our requirements, we will work closely with those concerned to improve their standards by implementing a Corrective Action Plan (CAP) and provide the relevant training and monitoring. If sufficient improvements are not achieved after working with the supplier, then Conair will ultimately terminate the trading relationship.

These approaches shape the standards by which we measure our suppliers and are a pre-requisite to trading with Conair. We believe all parties should be working to promote staff welfare and ethical trading in the work environment.

REMEDATION MEASURES AND REMEDIATION OF LOSS OF INCOME

We are not aware of any incidents of forced or child labour in our business or supply chain during the Reporting Period and have not had to take measures to respond to incidents of forced or child labour. We will nevertheless continue to act in accordance our policies and processes aimed at prohibiting the use of forced and child labour in our business and supply chains and respond accordingly if such incidents arise. As Conair is not aware of any incidents of forced or child labour in its supply chain during the reporting period, the question of remediating the loss of income for vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour within its supply chains has also not arisen.

MEASURING EFFECTIVENESS

We encourage an open and transparent relationship with our suppliers. Many of our suppliers work predominantly with us and have a long-standing relationship with us. It is not unusual for Conair staff to be periodically deployed to work within our suppliers' premises for a variety of reasons but all with the purpose of expediting the best results. These long standing and collaborative relationships are often naturally aligned to our ethos in supporting the promotion of human rights. Newer relationships can achieve this where an open, transparent, and collaborative relationship is established. We consider the nature of our trading relationship in evaluating risks and develop our training, monitoring, and auditing programs accordingly.

TRAINING FOR STAFF

We recognize the importance in educating our staff and we have implemented training to raise their awareness in all matters concerning modern slavery, including forced and child labour, how to spot the risks, where to report their concerns, and how we can work to protect the most vulnerable people in our society.

APPROVAL AND ATTESTATION

This report is approved and attested, as required under subsection 11(4)(a) and subsection 11(5) of the Act.

J. Clem MacMullin
General Manager / Board Member
Conair Consumer Products ULC
I have authority to bind the Company

May 2024