

# Mark Anthony Group Forced & Child Labour Act Statement

Mark Anthony Group is committed to respecting and supporting the protection of human rights and stands against all forms of modern slavery. We understand the role we play through our business practices and aim to have a positive impact on human rights.

The report is published in alignment with Canada's Forced and Child Labour Act on behalf of Mark Anthony Group for the financial year ending March 31<sup>st</sup>, 2024. This report discloses measures taken and future opportunities for additional implementation by the organization. The entity covered by this report is Mark Anthony Group Inc. (Business Number 10371-4010).

## 1. Structure, Activities & Supply Chain

Mark Anthony Group is built on a foundation of family values, a bold vision and relentless determination to continuously raise the bar and make a positive difference in the world. Founded in 1972, Mark Anthony has grown organically from a one-person import wine business into a significant and meaningful drinks company whose hallmarks include a portfolio of luxury wineries and iconic beverage brands.

Mark Anthony Group is steadfast in its commitment to uphold honesty and integrity in all its business operations. Mark Anthony Group has identified a low risk of modern slavery in current operations and the existing business model. We recognize that human rights observers have identified a risk could exist in the broad supply chain.

Mark Anthony Group has proactively implemented relevant policies and due diligence processes to identify and measure risks associated with forced and child labour in its supply chain and operations. These are outlined below in Section 2 and we recognize, however that we can always look for improvements. Mark Anthony Group is dedicated to continue to enhance our initiatives to actively contribute to reducing the risk of forced and child labour in its supply chain.

## 2. Policies & Due Diligence Processes

Mark Anthony Group adheres to a stringent business ethos, prioritizing engagement with premier suppliers and professionals. This philosophy, coupled with Mark Anthony Group's strategy of cultivating deep relationships with its vendors, serves as a fundamental safeguard against the risks of forced or child labour, as well as other unethical practices within its operations and supply chain. Mark Anthony Group has taken proactive measures including:

Internal Risk Assessments: Execution of internal assessments within Mark Anthony Group's operations and supply chain. This involved collaborative workshops with key stakeholders to facilitate supply chain mapping and risk analysis.

External Consultancy Engagement: Collaboration with external experts to conduct a supply chain risk assessment, further reinforcing our commitment to understanding and proactively managing risks of forced and child labour in our supply chain.

Seasonal Worker Program: Mark Anthony Group currently takes part in the Seasonal Agricultural Workers Program and is in alignment with all related policies and standards. Mark Anthony Group receives regular audits on employment conditions to ensure alignment. Over 70% of employees participating in this program return for work the following year and a number of new employees are sourced via employee referrals indicating a positive working environment.

These, and other initiatives reflected in the report herein, demonstrate Mark Anthony Group's current position, and its ongoing commitment to continuing to uphold the highest standard of ethical labour practices, and foster a sustainable, responsible supply chain.



### **3. Forced Labour & Child Labour Risks**

Mark Anthony Group has conducted a process to assess risk guided by insights provided by the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and by the US Department of Labor's List of Goods Produced by Child Labour or Forced Labour. Mark Anthony Group has relied on these documents for its risk identification process as they are considered the best source of information for Canadian entities as it relates to the risk of forced or child labour.

Risk Assessment Findings: The assessment acknowledges that no industry is entirely exempt from the risks of forced and child labour and there are inherent vulnerabilities within certain sectors of supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be robust. The analysis considered specific geographic regions that, according to the Walk Free Global Slavery Index and other credible sources, present a higher risk of forced and child labour practices. This geographic risk assessment, was combined with an assessment of at-risk-goods categories, further enabling a targeted lens to our risk assessment.

More than three quarters of our total supplier expenditure is with suppliers in Canada and the United States, where the estimated risk of forced or child labor is significantly lower. Through our analysis, however, we identified suppliers in select countries where there is a heightened inherent risk of these issues. Despite this, our imports from these countries represent an immaterial portion of our annual supplier spending, and therefore, the associated risk is considered low.

Mark Anthony Group considered data from the US Department of Labor's List of Goods Produced by Child Labour or Forced Labour. This is an important step in isolating specific goods from our import portfolio that may be susceptible to forced or child labour. When considering this data against the products that we import, no product level risks were uncovered.

Overall, the findings from our risk assessment suggest that our exposure to forced and child labour risks is low based on the countries we choose to work with, our shared values and strong practices.

### **4. Remediation Measures**

Our assessments have not identified any instances of forced or child labour, to date, within our operations or supply chains, and accordingly, no remediation measures have been taken. In alignment with the United Nations Guiding Principles on Business and Human Rights, we recognize the importance of having robust remediation measures in place.

While no instances of forced or child labour within our operations or supply chains have been identified, should they be in the future, immediate action will be taken. We will engage directly with affected individuals and communities to understand the impact and develop appropriate remediation measures. Recognizing the complexity of supply chains, we commit to working collaboratively with our suppliers to ensure remediation measures are effectively implemented.

### **5. Remediation of Loss of Income**

Mark Anthony Group has not identified any instances of child or forced labour in its operations or supply chains, and by way of a supply chain risk assessment has determined itself to carry a relatively low overall supply chain risk as it relates to forced or child labour. Thus, no measures have been taken to remediate the loss of income to vulnerable families. Mark Anthony Group recognizes the importance of being prepared to take immediate and effective action should any such issues arise.



## 6. Training

Mark Anthony Group has conducted in-house training to its supply chain staff, specifically as it relates to forced and child labour in the supply chain. Mark Anthony Group is also exploring additional training to its staff for continued awareness and engagement on forced and child labour in the supply chain and overall operations. We acknowledge this is a critical step in our ongoing commitment to managing forced and child labour and are considering:

Employee Training: Development of targeted training for employees with roles in contracting and purchasing is being assessed for potential delivery in FY2025. This training would be mandatory for the identified employees, emphasizing its importance within our operations, and may cover topics such as how to identify and manage potential risks of forced and child labour in the supply chain. Our aim is to foster a supply chain and team of professionals that are collectively vigilant and proactive against forced and child labour.

Code of Conduct Inclusion: As part of Mark Anthony Group's regular review of its employee Code of Conduct, we will consider updating the Code to state our position on forced and child labour so that Mark Anthony Group's expectations of its suppliers' labour practices are understood by all employees. Employees are required to sign the Code of Conduct prior to commencement of employment for all new employees and recertification of the code for all employees is required periodically. While we appreciate the Code of Conduct is not a direct mode of training, we believe it is critical in setting expectations for business practices and supporting awareness of the issue of forced labour.

## 7. Assessing Effectiveness

While Mark Anthony Group does not currently have specific 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, we are committed to continuing to evolve our practices.

Mark Anthony Group is considering the implementation of tracking relevant performance indicators. These indicators may include:

- i. Number of hours invested in employee awareness and training events
- ii. Number of reported cases related to forced and child labour
- iii. Number of managed and or resolved cases related to forced and child labour
- iv. Number of contracts amended and initiated to include anti-forced labour and anti-child labour clauses
- v. Number of suppliers who have submitted an attestation to compliance with forced and child labour laws

## 8. Attestation

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.

May 17, 2024

Date

Victor Giacomini

Authorized Signing Officer

I have authority to bind the corporation.

