

**TJP Labs Inc.**  
**Report Prepared Pursuant to Canada's Fighting Against  
 Forced Labour and Child Labour in Supply Chains Act**

**1. Introduction and Identity**

This Report is made by TJP Labs Inc. (“**TJP**”, “**our**”, “**us**” and “**we**”) for the financial reporting year ended December 31, 2024 (the “**Reporting Period**”) and sets out the steps taken by us to prevent and reduce the risk that forced labour or child labour was used at any step in our production of goods in Canada or elsewhere or of goods we imported into Canada during the Reporting Period.

This Report has been prepared and filed pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

**2. Steps Taken During the Reporting Period to Prevent and Reduce Risks of Forced Labour and Child Labour**

TJP values the safety, dignity and well-being of our employees and those of the entities with whom we do business, and we are committed to taking steps to reduce the risk of forced labour and child labour throughout our supply chain.

While we did not have formal policies and procedures in place during the Reporting Period to audit or monitor those suppliers who are part of our supply chain, our procurement team was trained to be alert to the potential use of forced or child labour in our supply chains. Had any such activities been identified they would have been addressed by us. Thankfully, no instances of forced labour or child labour were identified by us in the Reporting Period.

In our own organization, we ensure that all employees are recruited voluntarily, including conducting background checks, reference checks and interviews and that their employment is based on terms and conditions known and understood by them prior to the start of their employment.

Since January 1, 2025, TJP has begun to take the following steps regarding its supply chain:

- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in our supply chains
- Developing an action plan for addressing any instances of forced or child labour
- Developing due diligence policies and processes for identifying and addressing the use of forced or child labour in our supply chains
- Developing standards, supplier codes of conduct and/or compliance checklists
- Monitoring and auditing suppliers
- Developing and implementing grievance mechanisms to address complaints in the workplace
- Developing and implementing anti-forced labour and/or child labour contractual clauses
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Developing procedures to track performance in addressing forced labour and/or child labour

**3. Structure, Activities and Supply Chains**

**Structure:**

TJP is a corporation that is governed by the *Business Corporations Act (Ontario)*, with its registered office in Toronto, Ontario. Our manufacturing operations are conducted at TJP's facilities in Pickering, Ontario.

**Activities:**

We are one of North America's leading, full-service, contract manufacturer of premium quality next-generation products, specializing in modern oral buccal delivery pouch manufacturing, focusing on nicotine and caffeine.

During the Reporting Period, all products manufactured by TJP were exported for sale to the United States of America ("USA"). Our sales are exclusively business to business as we are a contract manufacturer of brands owned and marketed by other companies who sell the products we make for them in the USA.

**Supply Chains:**

TJP's supply chains are mainly composed of suppliers (each a "Supplier" and collectively, "Suppliers") of various ingredients, including synthetic nicotine granulate and caffeine powder as well as packaging materials, which we use at our facilities described above.

**Materials Used in Production**

TJP produces oral buccal pouches that contain nicotine or caffeine along with certain other ingredients, which are packaged in individual fleece pouches. Most of materials used in the manufacture of our products come from Canada, the USA, Northern Ireland and U.K. However, some of the ingredients that we use to manufacture our caffeine pouch products, which we purchase from our USA-based suppliers, are in some instances sourced by such USA-suppliers from suppliers in Asia.

**Containers and Packaging Materials**

TJP mainly uses containers made of polypropylene and packaging material made of cardboard sourced from Canada and the USA. Until the middle of the Reporting Period, the containers used in the manufacture of our products were sourced from a supplier in China. Since then, all of the containers that we use are sourced from a Canadian Supplier, except to the extent we are required by one of our customers to use cans that they have sourced from a Chinese supplier.

**4. Policies and Due Diligence Processes**

TJP strictly prohibits the use of forced and/or child labour in its own operations and in its supply chain. In addition, we have begun to put in place the certain policies and due diligence processes referred to in this Report that are aimed at preventing and mitigating the risks relating to the use of forced or child labour in our supply chains. They demonstrate TJP's commitment to sustainable performance and to protecting human rights as well as its strong desire to create a safe and inclusive experience for all workers across its operations and supply chains. TJP is similarly committed to respecting and enforcing human rights. TJP strives to work with suppliers and other third parties who share our commitment to social, ethical, and environmental responsibility.

**Supplier Code of Conduct**

The Supplier Code of Conduct, which sets out TJP's values and expectations of our Suppliers, has been recently adopted and distributed to all Suppliers. It reflects TJP's engagement to further monitor and prevent forced or child labour risks in its supply chains. TJP will require its Suppliers to adhere to the Supplier Code of Conduct and to implement its requirements in a manner that is appropriate and proportional to the nature and scale of their activities, the goods that they supply and the services that they perform. Specifically, the Supplier Code of Conduct prohibits the use of forced or child labour by a Supplier and provides that Suppliers must conduct reasonable due diligence on their own supply chains and operations to ensure that there is no use of forced labour or child labour. The Supplier Code of Conduct further specifies that Suppliers must notify TJP immediately if they become aware or suspect the use of forced labour or child

labour in their business operations or supply chains, including the scope and impact of such forced labour or child labour occurrence on their business relationship and contract(s).

#### **Feedback Reporting Procedures**

A physical feedback box has been put in place by TJP's manufacturing facility for anyone who believes that a Supplier has engaged in illegal, unethical, or otherwise wrongful conduct, or conducted any other activity in violation of the Supplier Code of Conduct. In addition, our employee Code of Conduct encourages all our employees to report conduct that they feel is contrary to our standards or policies.

### **5. Parts of Business and Supply Chains with Forced Labour and/or Child Labour Risks and Steps Taken to Assess and Manage Those Risks**

TJP considers the risk of forced labour or child labour to be low in its operations. In fact, all employees are hired in accordance with, at a minimum, the applicable laws and regulations and TJP conducts checks to ensure that individuals have the right to work and are choosing to work of their own free will.

In 2025, TJP began a preliminary mapping of its supply chains to identify any risk of forced labour and child labour that might be occurring. Given the preliminary nature of the supply chains mapping and the fact that TJP relies on global supply chains which present visibility challenges, no definitive risk areas have been identified yet, but supply chain risks will be further analyzed as the assessment process will continue in 2025 and beyond.

TJP has also taken steps to assess the risks of forced labour and child labour in its activities and supply chains by providing Suppliers with a supplier assessment questionnaire to identify the actions they have taken to prevent and reduce the risk that forced or child labour is used at any step of the production of goods or materials. This assessment is sent out as a package when adding a new Supplier, and we will be sending this out every year, to track the Suppliers.

### **6. Remediation Measures**

TJP has not identified risks related to forced or child labour in its supply chains at the moment as TJP is currently in the process of conducting a preliminary mapping of forced labour or child labour risks.

Further, TJP has not identified forced labour or child labour in its own direct operations. As a result, no remediation measures have been taken.

### **7. Remediation of Loss of Income to the Most Vulnerable Families**

As TJP has not yet identified any instances of forced labour or child labour in its activities and supply chains, no measures were taken to remediate the loss of income to the most vulnerable families that results from measures taken to eliminate the use of forced labour and child labour.

### **8. Employee Training**

TJP has developed and implemented training and awareness material regarding the requirements imposed by the Act and we are in the process of organizing formal training for the following groups/persons

- Board of Directors
- Executives
- Managers leading supply chain and procurement functions

**9. Assessing Effectiveness in Ensuring that Forced Labour and Child Labour are not Being Used in Entity's Business and Supply Chain**

TJP has introduced certain measures aimed at reducing the risk that forced labour or child labour will be used in its activities and supply chains. It has not yet taken any measure to assess the effectiveness of such measures.

**10. Approval and 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 on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, in my capacity as a director, 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 Period listed above.

Date: May 30, 2025

Signed by:  
  
DF082F23B0DD430... (signature line)

Name: Stratis Katsiris

Title: Director

I have the authority to bind TJP Labs Inc.

This Report was approved by the Board of Directors of TJP Labs Inc. on May 30, 2025 pursuant to Section 11(4)(a) of the Act