

Corporate Report on Combating Forced Labor and Child Labor in Supply Chains.

January to December 2023

For the company:

Multi-Action Communication Inc.

6890 St-Anne Blvd.

L'Ange-Gardien, Quebec

G0A 2K0

Labelling Domain: NAICS: Code 323119

Economic activity (CAE): 2819

Activity: Other Commercial Printing Industries

Details: Label printing

N.E.Q: 1177056554

Identification number: 1020876367

Website: www.multiaction.ca

Company Overview.

Mandate of the Organization

ID Images is a leading label company in North America, with a network of 16 state-of-the-art production sites, including 5 plants in Canada. The entire Canadian subsidiary, that is control by Multi Action Communication inc., has 230 employees in 2023.

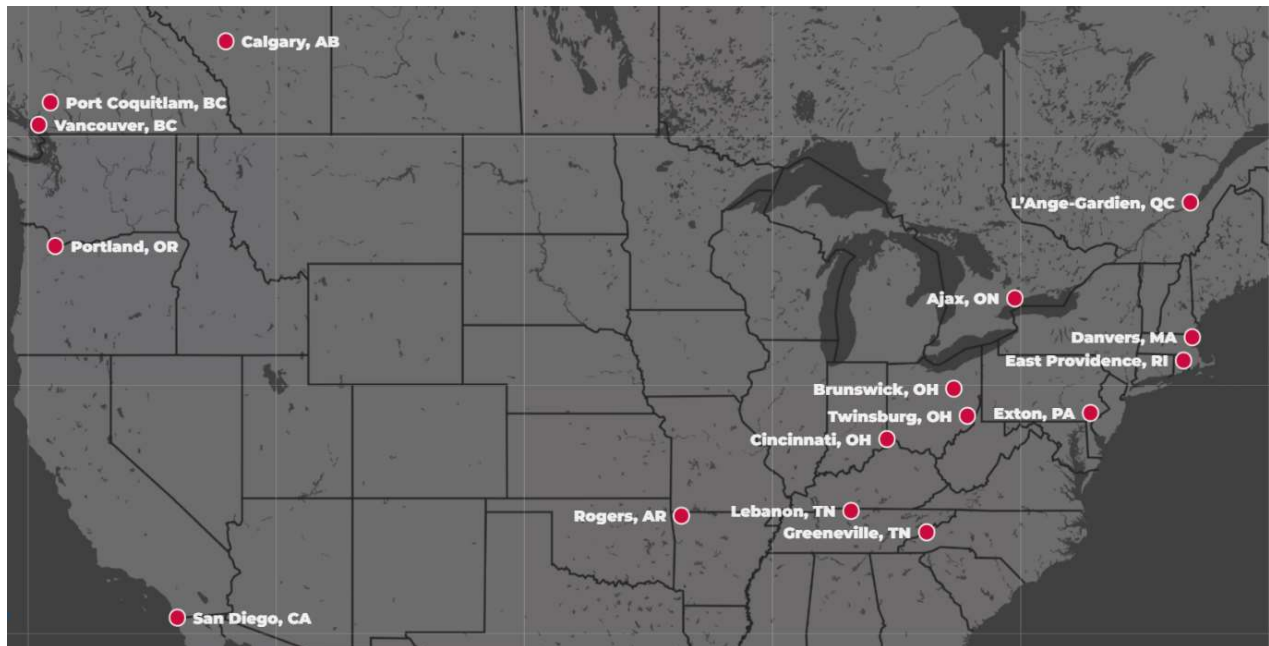
As specialists in custom labels, we also offer a selection of standard labels to meet the requirements of all industries. We combine the efficiency of a large organization with the tailor-made service of a local partner, ensuring optimal labeling solutions.

Our mandate is to meet the unique label needs of each industry and use case, while delivering superior value, innovation, quality, and service.

We offer specific expertise in producing labels that meet the standards and needs of the following industries: food and beverage, pharmaceuticals, health and beauty, automotive, electronics, etc.

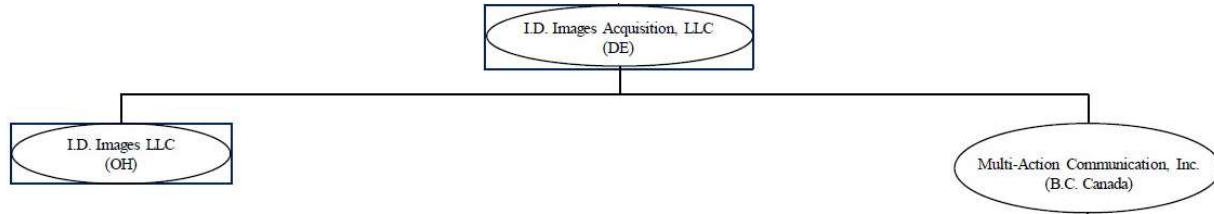
We perform continuous quality control of our products by running label tests and verifications to validate performance under real-world conditions.

We also offer a software integration service with the ability to connect to customers' systems to streamline the production process, improve overall efficiency, and add value.



All the locations of the 16 factories belonging to ID Images/Multi-Action Communication.

Organizational Structure



I.D. Images LER History (as of February 1, 2023)

1. 0909192 BC Ltd. merged with 1325851 B.C. Ltd., Gestion Bourbonniere Inc., Multi-Action Communication Inc., Multi-Action Holdings Inc., Multi-Action Labels Inc. and Sunwest Print Corporation into 1325851 B.C. Ltd. (changed its name to "Multi-Action Communication Inc." on October 1, 2021) (BC (Canada)), October 1, 2021.
2. Sunwest Print Corporation merged with 1325851 B.C. Ltd., Gestion Bourbonniere Inc., Multi-Action Communication Inc., Multi-Action Holdings Inc., Multi-Action Labels Inc. and 0909192 B.C. Ltd. into 1325851 B.C. Ltd. (changed its name to Multi-Action Communication Inc. on October 1, 2021) (BC (Canada)), October 1, 2021.
3. I.D. Images Holdings LLC (OH) merged with and into I.D. Images LLC (OH), November 10, 2021
4. Digital Printing Concepts, LLC (RI) acquired by I.D. Images Acquisition LLC on September 17, 2021 merged with and into I.D. Images, LLC (OH), November 16, 2021
5. Seneca Label, Inc. (OH) acquired by I.D. Images Acquisition, LLC on November 30, 2021 merged with and into I.D. Images, LLC (OH) effective January 3, 2022.
6. Valley Forge Tape & Label, Co., Inc. (PA) acquired by I.D. Images Acquisition, LLC on December 31, 2021 merged with and into I.D. Images, LLC (OH) effective February 1, 2022.
7. Hickman Label Company, LLC (TN) acquired by I.D. Images Acquisition, LLC on October 31, 2022, effective October 31, 2022.
8. 1386273 B.C. Ltd., AGC Investments, Inc., Daily Dip Holdings, Ltd., Precision Label Holdings, Ltd., Precision Label, Ltd., and Summit Print Corporation into 1386273 B.C. Ltd. (changed its name to "Summit Print and Precision Label Ltd." (BC (Canada)) on November 30, 2022), November 30, 2022.
9. Summit Print and Precision Label Ltd. amalgamated into Multi-Action Communication, Inc. (B.C. Canada) effective February 1, 2023.
10. Hickman Label Company, LLC (TN) merged with and into I.D. Images LLC (OH) effective February 1, 2023.

Operations & Supply Chain

Multi-Action owns label production plants with several specialized departments. We source raw materials for printing and cutting into a finished product that will meet the requirements of our customers located throughout North America.

Most of our raw materials come from Canada and the United States, but some suppliers are overseas.

Our raw materials are paper, plastic wraps, laminated paper, adhesives, silicone, inks, labels, printing ribbons and tubes and cores.

For the operation of our production, we also have suppliers of presses and other machinery, tools used to produce labels such as cutting dies, parts for presses, boxes for packaging and transport. We also have suppliers of production monitoring software.

Finally, to complete our customer service, we offer our customers, through suppliers, software for their home printing, printers, labeling machines and ribbons for printing on our labels.

All of our suppliers are included in a list of approved suppliers including their country of production, the type(s) of product(s) we buy from them, contacts and the importance of the supplier in terms of quality and order quantity.

Forced and Child Labor Due Diligence Efforts.

Multi-Action Communication Inc. has a code of conduct for its partners, suppliers and customers. It summarizes the company's mission and values, and contains our demands and commitment to fundamental human rights and the fight against forced and child labor. It also indicates the compliance of suppliers' products, occupational health and safety, confidentiality, and the means of reporting non-compliance with this code.

We also have a corporate policy that records our internal rules in line with the company's values.

Our suppliers are informed by our Code of Conduct, but also by our annual audit and questionnaire, which will be submitted in early 2024, on the supplier's actions and implications with its supply chain against forced and child labor.

In combination with the list of our suppliers and their responses to our annual audit and questionnaire, it will be possible to determine the risks associated with forced labor and child labor, if any.

Training Offered.

Training on Canada's S211 with aspects of forced labor and child labor has been developed internally and will be provided to all employees and managers of the company by mandatory 2024.

This first training is short and includes a summary of Law S211, its obligations and sanctions, the definition of human rights, forced labor and child labor. Also, there is an explanation of modern slavery and the legal age and acceptable conditions for child labor aged 18 and under, along with ILO definitions. There is also a section on the history of S211 and similar laws internationally.

This training will also be available to suppliers upon request.

Risk assessment in supply chains.

Mapping of all our approved suppliers is essential and has been completed. The list includes their place of manufacture, their importance in terms of purchase volume, contacts and the type(s) of product(s) purchased.

Most of our suppliers are Canadian or have their plants in North America or Europe. Many of our suppliers are already involved in the fight against modern slavery, as they are subject to similar laws in their countries.

We have a few Chinese suppliers (papers, adhesives, plastic wraps and laminates), manual label printer and applicator suppliers from Asia and Japan, and paper suppliers from South Korea.

According to our preliminary research, our suppliers do not fall into the categories of countries where forced and child labor has been reported in our field.^{1 2}

A questionnaire already developed on the supplier's involvement in human rights and the fight against modern slavery will be submitted to all our suppliers in 2024 (document FOU-004). Receiving completed questionnaires will be a huge gain in risk assessment, as we will be able to target suppliers that are less informed on human rights and most at risk of using modern slavery.

Risk Mitigation: Description of measures taken to assess and reduce risks related to forced or child labor in supply chains.

Risk mitigation is a strategy used by organizations to reduce the effects of business risks. It is similar to the risk reduction process, where potential business threats are identified before the organization takes the necessary steps to mitigate the effects of those factors. In the context of forced labor or child labor in supply chains, risk mitigation plays a crucial role.

Here are some common steps to assess and reduce our risks:

1. Temporary risk acceptance: This involves accepting a certain level of risk for a set period of time. During this time, the organization can focus on mitigating other risks that are more important or can be mitigated or eliminated more easily and quickly.
2. Risk avoidance: When the consequences of certain risks are too great to mitigate, this strategy involves avoiding the risk altogether (e.g., refusing to take on a supplier or stopping it as a result of non-conformities or high risks that have been identified and not remedied). In these cases, it may be best for our organization to take steps to eliminate and avoid the risk.

Risk analyses and recommendations that may be issued following the responses to questionnaires submitted to suppliers on S-211 and others.

Once we receive the responses through our fillable form, we will assess the risk that each individual represents. These answers are compiled via our dedicated mailbox: suppliercompliance@multiaction.ca. They will be analyzed and followed-up on if necessary. Previously issued measures may be used as recommendations for actions such as: Acceptance of risks or risk avoidance depending on the severity, the recurrence recorded and the risk itself depending on the product supplied.

Suppliers will be assessed globally once a year for their actions in relation to these specific aspects, in addition to other necessary supplier-specific aspects. We aim for the ideal: total containment of risks. We will work to help our suppliers reduce risk as much as possible and encourage a caring and transparent mindset when it comes to the fight against forced child labor and modern slavery in all its forms.

¹https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2019/2020_TVPRAList_Online_Final.pdf

² <https://www.walkfree.org/global-slavery-index/methodology/methodology-content/#prevalence>

Certificates requested from all our suppliers.

Our suppliers are encouraged to submit their policies, code of conduct, due diligence and any other certifications deemed important to their efforts to respect human rights, or the eradication of forced child labor and modern slavery in all its forms.

Juvenile workers.

All partners must have hiring practices that verify the exact age of their employees. Suppliers must comply with the legal age of employment established by the countries or regions where they operate and child labor must not take place in unsafe conditions, disrupt their education or otherwise contravene Canadian law and the 1999 Convention on the Worst Forms of Child Labor.

Multi-Action Communication Inc. requires its suppliers to follow at least the recommendations of the *International Labor Organization*, for example, minimum of 15 years of age for regular work, even if the country where the supplier performs its functions has standards lower than the ILO.

Prohibition on the importation into Canada of goods manufactured in whole or in part through the use of forced labor or child labor.

Our company reserves the right to refuse or terminate a supplier already in business if we have a reasonable suspicion that a product is manufactured in whole or in part by the use of forced labor and child labor. We believe that this practice is unacceptable and we will take action to ensure that it is banned.

Human Well-Being.

At Multi-Action Communication Inc., we value communication, integrity, sharing and respect for others in our business relationships with all our partners. Multi-Action Communication Inc. applies these same values to its employees.

In order to ensure maximum well-being for all, a communication policy has been established across all the group's sites. Its role is to strengthen communications, collaborations and all other types of internal and inter-company exchanges, as well as with partners, such as customers and suppliers.

Respect, Discrimination, Violence and Harassment in the Workplace.

Multi-Action Communication Inc. recognizes that every human being has intrinsic rights and freedoms, including the right to respect, to safeguard his or her dignity and to have his or her physical and psychological integrity protected. It follows that any form of harassment, whether physical or psychological, is a form of violation of fundamental human rights.

Harassment, discrimination, violence and disrespect for others are not tolerated at Multi-Action Communication Inc. We strongly believe that these issues disrupt the atmosphere and deteriorate working conditions, which is why partners, customers and suppliers, must commit to maintaining a respectful work environment free of these harmful issues, throughout their collaboration with Multi-Action Communication Inc.

As part of this commitment, all employees must respect the dignity, self-esteem, honor and reputation of their co-workers, regardless of whether they are subordinates, superiors or colleagues at the same level.

Report on Compliance with Canadian Bill S-211	Document #: RP-GE-001 Version: 1.0 - EN	
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Multi-Action Communication Inc. is committed to maintain a workplace free from all forms of harassment. This is why these values must be respected by suppliers and clients of Multi-Action Communication Inc.

Employees and partners must contribute to raise awareness, inform and train the community in order to prevent harassing conduct and ensure that everyone has the right to be treated fairly without discrimination or harassment.

Multi-Action Communication Inc. is committed to provide the necessary support to people who believe they are experiencing any type of violence or discrimination during exchanges and collaborations, directly or indirectly, by establishing mechanisms for assistance and complaint processing.

Additional information on this component can be found in the Employee Handbook.

Freedom of association and protection against discrimination.

Multi-Action Communication Inc. expects its partners to actively participate in social dialogue, preserving the right to freedom of association and expression, in accordance with local laws and to prohibit all forms of discrimination.

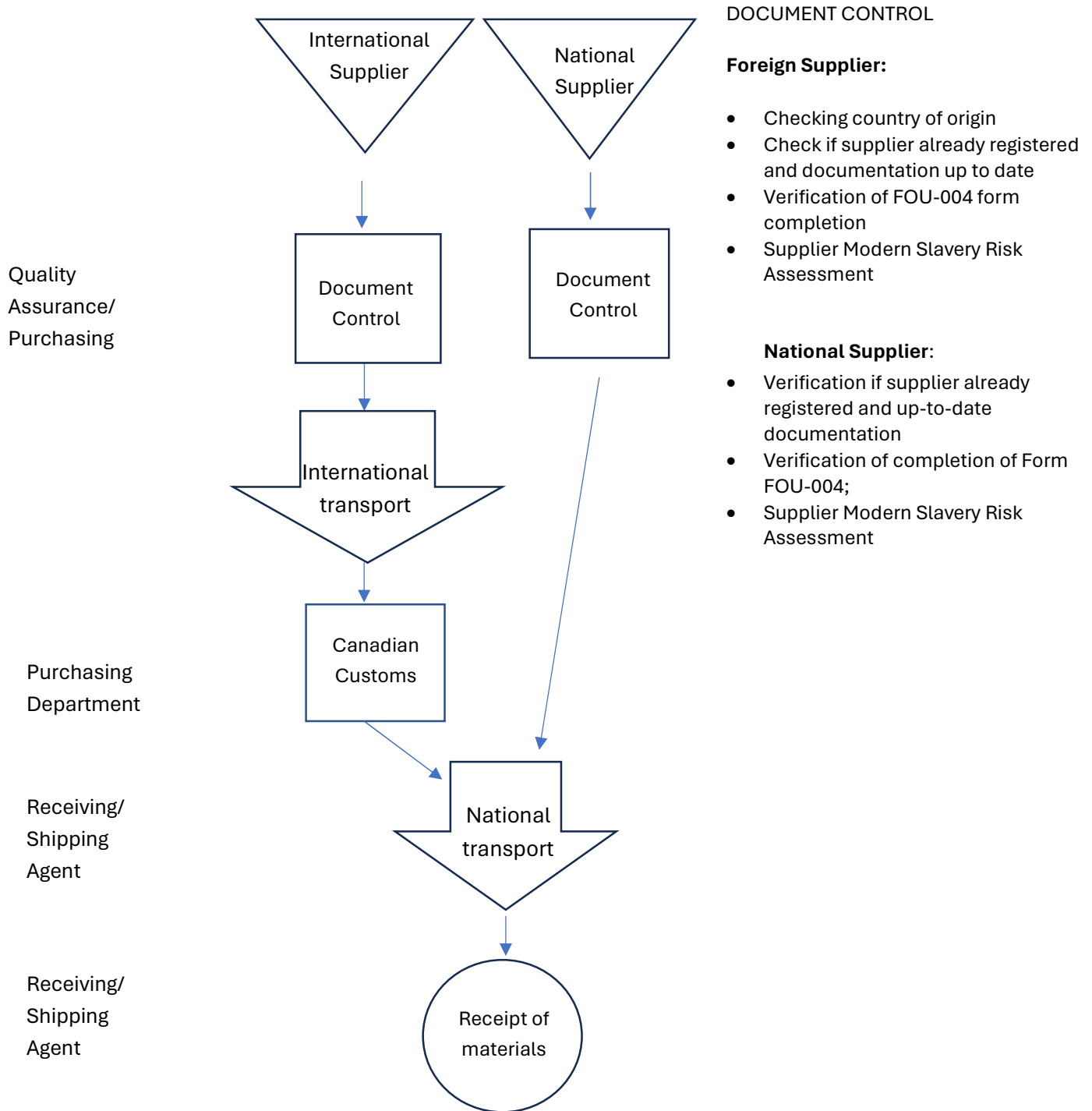
Author: QA-Department -MAQ	Reviewer(s): Head Office, Purchasing	Published: 2024-03-22 P 7
Link: RP-GE-001 Report on compliance with canadian Bill S-211.docx		

Goods receiving process flowchart.

Manager

Activity

Notes



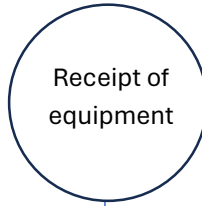
Goods receiving process flowchart -continued.

Manager

Activity

Notes

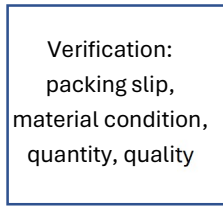
Receiving/
Shipping
Agent



Follow Goods
Receipt Procedure
PR-ET-001

Receiving/
Shipping
Agent

Compliant

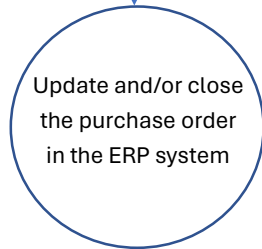


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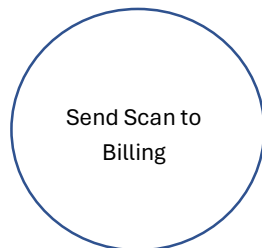
Receiving/
Shipping
Agent



Receiving/
Shipping
Agent



Receiving/
Shipping
Agent



Accounting

