

# ARDENE

## **Report on Compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act**

**Fiscal Year Ended January 31, 2024**

## Arden Holdings Inc. - Report on Compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report of Arden Holdings Inc. (“Ardene”) is made in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) for the financial year ended January 31, 2024.

### **Structure, Activities and Supply Chains**

Founded in the early 1980’s, Ardene is a privately owned company which began as an accessories and jewellery retailer and grew into the ultimate destination in Canada for head-to-toe apparel, footwear and accessories. In 1982, Ardene opened its first 500 square foot store near Montreal, Quebec and by 1995, it expanded to over 150 stores nationwide. As at January 31, 2024, Ardene operated over 225 stores across Canada with representation in every province, occupying over 1.9 million square feet of retail space. In 2012, Ardene launched its [www.ardene.com](http://www.ardene.com) ecommerce website and in 2019, the Ardene mobile app was launched. Ardene has over 3,000 employees. Its new 620,000 square foot headquarters and distribution center are both based in Laval, Quebec, Canada. In 2013, the philanthropic arm, the Ardene Foundation was established.

For over four decades, Ardene has expanded its product mix to include clothing, footwear and accessories under the Ardene brand as well as various sub-brands such as Ardene Kids, Ardene MAN, Rose + Vine, MOVE by Ardene, Ardene Curve, Ardene Collective, Ardene Basic Collection, A.C.W Ardene Contemporary Wear & Design, A.CO and Ardene Swim.

We source materials and products globally, with a significant portion of our products originating from vendors in China and Bangladesh. We take pride in nurturing strong partnerships with our reputable and long-standing vendors and factories, with the expectation that the environments in which our products are manufactured will adhere to high standards of safety, fairness, sustainability, and responsibility.

### **Policies and Due Diligence Processes in relation to Forced Labour and Child Labour**

Ardene maintains a staunch stance against all forms of forced labour and child labour. We are dedicated to conducting business ethically and transparently, with systems and controls in place to prevent forced labour and child labour in our supply chain.

Through our 3<sup>rd</sup> party social compliance audit program, we aim to pinpoint high-risk areas within our supply chain. The social audits, or ethical audits help us verify if our supply chain partners are complying with our social responsibility principles. Every Tier One (direct) facility that manufactures products for Ardene must submit a 3<sup>rd</sup> party verified social compliance audit. Additionally, in cases where corrective action is required, a corrective

action plan must be submitted to our compliance team. These social compliance audits are submitted and verified on an annual basis.

Our key internal framework and policies to prevent and reduce the risk of forced labour or child labour during all stages of production are contained in our Vendor Manual, which includes our Vendor Code of Conduct and our Ethical Trade Code of Conduct. These policies govern sourcing, manufacturing, and supply processes. They emphasize workers' rights, environmental protection, and foster transparent and sustainable supplier relationships. A prohibition against the use of forced labor, child labor, and minimum wage violations is a cornerstone of our approach and policies.

The Vendor Code of Conduct and Ethical Trade Code of Conduct apply broadly to our activities and supply chains. Both policies address the issues of forced labour and child labour. Our vendors must agree that they will not at any time use child labour, prison labour or slave labour in connection with the manufacture and production of our products. Although primarily targeting compliance with Tier One (direct) factories, where final products are being assembled, Ardene understands the need to map further tiers in the supply chain to help ensure that no forced labour or child labour is used in any part of the supply chain.

Our Ethical Trade Code of Conduct is based on the 9 criteria of the ETI (Ethical Trade Initiative) code of conduct, an internationally recognized code of labour practice. It is the responsibility of each vendor to ensure that products are sourced from manufacturers who care about their workforce and consistently implement acceptable working conditions.

It is mandatory for our vendors to annually acknowledge and accept the Vendor Code of Conduct and our Ethical Trade Code of Conduct to reinforce our stance on breaches. These policies underscore our commitment to ethical sourcing and transparency.

We understand that supply chain mapping beyond our Tier One (direct) factories is needed to fully identify forced labour and child labour risks in our supply chain. We are working on ways to gather and assess data from additional Tiers in our supply chain. As at January 31, 2024, no systems were in place to gather data other than in our Tier One (direct) factories.

**The Parts of the Business and Supply Chains that carry a Risk of Forced Labour or Child Labour being Used and the Steps we have taken to Assess and Manage that Risk**

Ardene acknowledges the heightened risk of forced labour and child labour associated with and recognized in our industry sector and the types of products it sells, namely, apparel made with cotton fibres.

Ardene also acknowledges the heightened risk of forced labour and child labour associated with the countries of origin related to the production of our goods. Specifically, a majority of our vendors are located in high-risk countries, namely, China and Bangladesh.

We also recognize that the company's primary risks lie in our Tier One (direct) product manufacturers, suppliers of raw materials and components, and subcontracted manufacturing processes such as printing, dyeing, and finishing.

To identify and address these risks effectively, we are in the process of reviewing our existing audit program to evaluate what changes are needed to better track and identify forced labour and child labour risks in our supply chain. In the year ended Jan 31, 2024, this program was not fully operational and we are currently only tracking Tier One (direct) factories.

**Steps taken during the Financial Year ended January 31, 2024 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, or of Goods imported to Canada by Ardene**

Our Vendor Code of Conduct, which must be acknowledged and agreed to in writing by all vendors on an annual basis, states that vendors shall not use child labour, prison labour or slave labour at any time during and in connection with the manufacture and production of our products.

All Tier One (direct) factories that produce goods for Ardene must submit a 3<sup>rd</sup> party social compliance audit on an annual basis to the company. These audits cover many areas of compliance, including without limitation, verification that no forced labour or child labour is being used in the factory. Additionally, the 3<sup>rd</sup> party audits include an examination of the policies and procedures that factories have in place in order to ensure that they prohibit the use of forced labour and/or child labour in their factories.

Ardene prides itself on its long-standing business partnerships. We continue to partner with our long-standing suppliers where we have a solid knowledge of their organization, operations and policies.

**Measures taken to Remediate any Forced Labour or Child Labour**

No measures were undertaken during the financial year ended January 31, 2024.

**Measures 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 our Activities and Supply Chains**

No measures were undertaken during the financial year ended January 31, 2024

## **Training provided to Employees on Forced Labour and Child Labour**

No training on forced labour and child labour was provided to employees during the financial year ended January 31, 2024.

Starting in 2024, we will provide mandatory training for all employees who interact and work with our supply chains. The training will be offered to employees at all levels for approximately 100 employees. The targeted training on forced labour and child labour will include live sessions and webinars with an NGO industry specialist, Fashion Takes Action. Each session will be approximately 1 hour in duration. We also have plans for an internal certificate system for employees to measure their progress in understanding the risks of forced labour and child labour.

## **How Arden assesses its effectiveness in ensuring that Forced Labour and Child Labour are not being used in its Activities and Supply Chains.**

Our policies and procedures related to forced labour and child labour are reviewed annually and updated as needed.

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 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.

Full name: Mark Dervishian

Title: Chief Operating Officer - Arden Holdings Inc.

Date: May 24, 2024

Signature: *“Mark Dervishian”*

I have the authority to bind Arden Holdings Inc.

This Report was approved by the Board of Directors of Arden Holdings Inc. on May 24, 2024.