

## TP-Link Canada Inc. Forced Labor and Child Labor Report

### 1. Introduction

TP-Link is committed to maintaining a comprehensive employee management system. Each year, the Sustainable Committee formulates strategies and annual work objectives, which are then executed by the Human Resources department to improve the working environment for all employees. TP-Link strictly adheres to internationally recognized standards, including the Universal Declaration of Human Rights and the ILO (International Labour Organization) Conventions. As a member of the UN Global Compact (UNGC), TP-Link commits to its principles on human rights, labor, environment, anti-corruption, etc.

To address critical risk areas such as forced labor, child labor, diversity, inclusion, and anti-discrimination, TP-Link has implemented over 20 policies and regulations, including the Human Rights Policy, the Code of Conduct and Ethics, and the Supplier Code of Conduct. These policies aim to respect, protect, and promote equal human rights for all employees.

In 2024, we took the following steps to prevent and reduce the risk of forced labor or child labor being used at any stage of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada:

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains.
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains.
- Developing and implementing an action plan for addressing forced labour and/or child labour.
- Gathering information on worker recruitment and maintain internal controls to ensure that all workers are recruited voluntarily.
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.
- Developing and implementing child protection policies and processes.
- Developing and implementing anti-forced labour and/or -child labour contractual clauses.
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists.
- Auditing suppliers.

- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour.
- Developing and implementing grievance mechanisms.
- Developing and implementing training and awareness materials on forced labour and/or child labour.
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour.

## **2. Structure, activities and supply chains**

Organization Structure:

TP-Link Canada Inc. is a Canadian corporation with its principal offices at 88 Fulton Way, Richmond Hill, Ontario Canada L4B 1J5. We are a distributor in the networking devices and smart home products sector. Our parent company is TP-Link UK Limited, which is located at Unit 2 & 3 Riverview (142-144), Cardiff Road, Reading, UK, RG1 8EW.

Our activities:

We import goods produced outside of Canada and sell and distribute goods and services within Canada.

Our business is organized into the following business units: consumer networking, consumer electronics, enterprise networking, enterprise security, software, and cloud services.

Our supply chains:

We have two main supply chains. Our hardware provider is TP-Link Corporation PTE. Ltd., which is located at 7 Temasek Boulevard #29-03 Suntec Tower One Singapore 038987. Our software and cloud service provider is TP-Link Global Inc., which is located at 36 Technology, Suite 200, Irvine, CA, United States, 92618.

## **3. Policies and due diligence processes**

TP-Link has established comprehensive due diligence processes to ensure compliance with policies aimed at eradicating forced labour and child labour. These processes include regular audits, risk assessments, and control measures.

The company has instituted the Forced Labor Control Procedures and the Child and Juvenile Worker Protection and Remediation Management Procedures. These procedures are designed to assess and manage risks, remediate incidents, and mitigate income loss for vulnerable families affected by efforts to eliminate forced labor and child labor.

Annual risk assessments are conducted to identify and manage these risks, evaluating factors such as frequency, legal regulations, scope, severity, and impact. High-risk areas are identified and addressed with detailed control measures to mitigate potential risks.

Our due diligence process related to forced labour and child labour includes:

- Embedding responsible business conduct into policies and management systems
- Identifying assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate.

#### **4. Forced labour and child labour risks**

We have conducted comprehensive risk assessments to identify parts of our activities and supply chains that are susceptible to forced labour and child labour to the best of our knowledge. We will continue to strive to identify emerging risks. Our rigorous assessment methods include supply chain mapping and targeted risk evaluations, ensuring that we effectively address and mitigate these risks.

An annual risk assessment for child labour and forced labour is conducted, taking into account industry characteristics and regulatory requirements. This process helps us identify risks in our own factories. Simultaneously, we assess risks within the supply chain and implement corresponding control measures to manage them effectively.

Strict enforcement of ILO Conventions prohibiting child labor is a cornerstone of our risk management strategy. We employ comprehensive identity verification processes during recruitment to ensure compliance. Additionally, if child labor is discovered, we enact an immediate cessation of work and provide health check-ups for the affected individuals, followed by their safe return to guardians.

#### **5. Remediation measures**

Our approach to remediation involves a range of measures tailored to counteract and address adverse impacts. These include detailed procedures outlined in the Forced Labor Control Procedures and the Child and Juvenile Worker Protection and Remediation Management Procedures, including:

- Subsidies and support for education until the child reaches legal working age.
- Immediate termination of the labor contract upon discovery, accompanied by the provision of additional severance benefits, as well as medical and living expense coverage.
- Employment training opportunities for families facing hardship to indirectly prevent child labor.

## **6. Remediation of loss of income**

We have established comprehensive remediation measures to promptly address and mitigate the impact of income loss of vulnerable families when instances of child labor are identified. These measures include:

- Offering subsidies and support for affected families.
- Providing employment training opportunities to family members.
- Covering educational expenses for child laborers until they are of legal working age.

## **7. Training**

We conduct extensive training programs to raise awareness and educate employees about the risks and indicators of forced labor and child labor.

Key elements of our training program include:

- Onboarding training: All new employees receive training upon joining the company.
- Management training: Targeted sessions on forced labor and child labor are provided for management.
- Recruitment compliance training: Personnel involved in recruitment undergo specialized training on compliance and effective identity verification.
- Annual training plans: We develop annual training plans covering forced labor, child labor, and related topics.
- Training development: Courses are developed internally and supplemented with external resources as needed.

These initiatives ensure that our workforce, especially management and recruitment teams, are well-prepared to uphold TP-Link's commitment to preventing forced labor and child labor.

## **8. Assessing effectiveness**

We employ rigorous methods to assess the effectiveness of our measures in preventing forced labor and child labor, including but not limited to:

- Risk assessment and management: TP-Link conducts annual comprehensive risk assessments for forced labor, child labor, and other factors. These assessments evaluate risk factors such as frequency, legal regulations, scope, severity, and impact. HR implements detailed control measures for significant risks, continuously improving systems to prevent potential risk events.
- Feedback and whistleblowing mechanisms: Multiple channels and communication mechanisms are in place to facilitate employee feedback and complaints about forced labor or child labor. An anonymous suggestion box and Whistleblower

Protection Management Regulations allow employees to voice concerns. An employee representative system with elected representatives holds regular meetings to discuss company development, policies, and employee welfare.

- RBA audit and supplier compliance: In 2024, our largest manufacturing facility underwent an RBA audit to ensure the effectiveness of internal controls. The Supplier Social Responsibility Management Procedure mandates that suppliers adhere to the Supplier Code of Conduct. High-risk suppliers undergo on-site audits to assess compliance and prevent forced labor and child labor in the supply chain.

These initiatives ensure TP-Link maintains a robust framework for preventing and mitigating forced labor and child labor risks across its operations and supply chains.

## 9. Summary

Through these measures, we firmly opposes child labor and forced labor, prohibits discrimination and harassment, and ensures employees' legal rights in diversity, equality, career choice, association, assembly, religion, and belief, maintaining compliant operations.

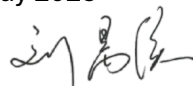
## 10. Approval and attestation

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 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.

Full name: Binghou Liu

Title: Director

Date: 29<sup>th</sup> May 2025

Signature, 

I have the authority to bind TP-Link Canada Inc.

Appendices:

- [TP-Link 2023 Sustainability Report](#)
- [Corporate Social Responsibility Policy](#)
- [Business Code of Conduct and Ethics](#)
- [Anti-Bribery and Corruption Policy](#)
- [Anti-Bribery and Corruption Due Diligence Questionnaire](#)
- [Human Rights Policy](#)
- [Health and Safety Policy](#)
- [Environmental Policy](#)
- [Sustainable Procurement Policy](#)
- [Supplier Code of Conduct](#)