



## JAM Industries Ltd.

### Forced and Child Labour Report for the financial year ended 31 March 2024

#### 1. Background

JAM Industries Ltd. (JAM, we, us, our) is a leading distributor of products across the pro audio visual, musical instrument, pro audio, sound and lighting and consumer electronics markets. JAM distributes products globally and has operations employing approximately 700 employees in Canada and the United States.

This is a consolidated Statement on behalf of JAM and its subsidiary companies which are together subject to the reporting requirements under Section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, by virtue of headquartered operations in Canada and our consolidated revenue. This Statement sets out certain elements of our supply chain integrity program which includes human rights. Our Supply Chain Integrity program continues to evolve and seeks to incorporate best practices.

Further information about JAM can be found at <https://jamindustries.com/>

#### 2. Our policy

JAM respects human rights and opposes all forms of modern slavery (including but not limited to forced labour, child labour and human trafficking). We are committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

#### 3. Modern slavery risks in our operations and supply chains

JAM promotes diversity and inclusion while cultivating a culture of respect, dignity and equal opportunities for all. The nature and locations of our business means that the majority of our workforce are skilled and experienced individuals, are locally based and are employed internally through our own Human Resources team. Fewer than 5% of employees are recruited through well-known third-party recruitment agencies with whom JAM have long standing contractual relationships. All of our offices and warehouses are located in Canada and the United States, which countries score less than 50 on the most recent Global Slavery Index.

JAM purchases services, finished and white label products from a wide range of 'third parties' (any entity or individual that JAM enters or has entered into an agreement with to (i) receive from, or (ii) provide to, products or services), associated with the markets set out in the Section 1. Background above.

Products are purchased domestically in Canada or the United States with the majority imported from Asia.

JAM imports products from certain countries that score more than 50 on the most recent Global Slavery Index. Certain product sets that JAM purchases are known to be associated with greater human rights risk, such as electronics.

#### 4. Organisational polices relating to modern slavery

**Code of Conduct** - JAM operates under a Code of Conduct which sets out a commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specific sections of the Code focus on fair employment practices and a commitment to preventing, as far as practicable, slavery and human trafficking in our supply chains. Further details can be found at [Governance and compliance – DCC plc](#)

**Human Rights Policy** – JAM operates under a Human Rights Policy which sets out a commitment to observe internationally recognised standards on human rights, including in relation to forced labour, child labour and unsafe working conditions. This policy requires us to consider human rights risks within our Supply Chain Integrity framework risk assessment procedures including taking steps to identify, prevent and mitigate human rights abuses in our business and supply chains. Further details can be found at [Governance and compliance – DCC plc](#)

**Supplier Code of Practice** – Our Supplier Code of Practice sets out the key ethical and legal standards that we require third parties we trade with to adhere to, which include employment and human rights standards. Further details can be found at <https://jamindustries.com/supplier-code-of-practice-canada-english/>.

## 5. Whistleblowing

JAM employees are actively supported in raising concerns (whistleblowing) if they believe that anything illegal or unethical, including, but not just, a breach of policies, is taking place. The ways in which concerns can be raised and our policies on how they are addressed are set out in the Code of Conduct and reiterated in other policies and internal communications. As well as a number of internal methods, an independent service for raising concerns is provided in relevant local languages. This service is available 24 hours a day on every day of the year.

The Human Rights Policy also sets out the ways in which non-employees can raise concerns in relation to any breach of human rights that may have occurred within our operations or our supply chains.

There is a clear policy of non-retaliation against any person who raises a concern; and concerns may be raised anonymously. All concerns raised are investigated.

## 6. Due Diligence and Assessing and Managing Risk

As part our compliance with the policies referred to above, we have a Supply Chain Integrity framework in place through which a dedicated team:

- Assess relevant compliance and regulatory risk in our supply chains through well developed and developed third party and product onboarding processes;
- Carry out enhanced due diligence on higher risk third parties identified through risk assessment;
- Mitigate risks identified, including by asking third parties to confirm they meet certain standards and through undertaking audits and audit remediation;
- Monitor risk areas in our supply chains at a suitable frequency depending on the risk assessment.

Onboarding and enhanced due diligence processes always include an independent check conducted on the third party. We work with a leading supplier of integrity due diligence, Kroll, to identify adverse media reports, litigation or regulatory enforcement activity concerning the third party. Third parties may be asked to complete a tailored due diligence questionnaire about their own compliance controls, such as its policies and procedures, including in relation to labour standard. We may conduct physical audits. All third party onboarding goes through a clear approval process.

## 7. Training

Our compliance training framework ensures that our employees receive training on compliance risks that are relevant to their roles. Both online and face-to-face training is provided depending on the subject being covered. Employees have received Code of Conduct training and specific Modern Slavery training during this reporting period.


## 8. Steps Planned for Financial Year ending 31 March 2025

We will continue to assess the effectiveness of our actions over the course of the next reporting period by tracking the progress of existing controls and through taking the following steps, among others, to enhance our procedures in order to further address the risk of modern slavery;

- Continue to provide face to face Modern Slavery training to our employee base;
- Complete the commenced integration of a specialist sanctions screening provider tool, which includes US UFLPA sanctioned entities lists and entities with known links to UFLPA sanctioned entities or human rights violations;
- Manage relationships with specialist supply chain mapping and ethical auditing providers to support our Supply Chain Integrity program;
- Embed a specific human rights risk assessment including country, third party and product typology risk into our Supply Chain Integrity framework;
- Based on the human rights risk assessment conduct enhanced due diligence including third party screening, supply chain mapping and where safe and appropriate in the relevant region, additional auditing.

## 9. Board Approval

This statement was approved by the Board of JAM Industries Ltd. On May 31, 2024



Stuart Frenkel  
Chief Executive Officer, JAM Industries Ltd.