

Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

May 31, 2025

1. Background

Vipond Inc. and Chubb Fire & Security Canada Corporation, subsidiaries of APi Group Holdings Canada (the “organization,” the “companies,” or “we”), prepared this report as required by the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

This report covers calendar years 2023 and 2024, as the organization continued to gather information pertaining to the issues of forced and child labour over the past two years. It is anticipated that future reporting, if required, will cover the prior calendar year. The companies prepared this Report jointly. The following provides a brief description of these companies’ main activities:

Entity	Description
Vipond Inc.	Provides fire detection/suppression and security systems, inspections, maintenance, and service throughout Canada
Chubb Fire & Security Canada Corporation	Provides fire & security systems throughout Canada

Neither company produces or manufactures goods nor controls any entity producing or importing goods. The companies are reporting, as they meet the criteria of business presence and size, and based on the limited amount of importing of goods into Canada (*discussed below*). As required by the Act, this report summarizes the steps that we have taken to prevent and reduce the risk that forced labour and child labour is used in our operations. We are committed to respecting human rights as a fundamental principle of our companies.

2. Policies and due diligence processes in relation to forced labour and child labour.

The organization recognizes that the risks of forced labour and child labour exist and acknowledge that understanding and managing these risks requires a collaborative approach with our suppliers, our workforce, and other external stakeholders.

Our policies and processes apply to the entire organization, to the extent they are applicable to an entity's business operations and outline the framework and objectives

the companies have put in place to appropriately assess and mitigate the risk of forced labour and child labour in our supply chains. Below are the key policies and processes of our framework:

Code of Business Conduct and Ethics. The first layer of our framework to prevent forced labour and child labour is our *Code of Business Conduct and Ethics (Code)*. The Code applies to all entities and all team members, and governs such areas as: compliance with laws, rules and regulations, and reporting of any illegal or unethical behavior.

Pursuant to the Code, the organization does not tolerate human rights abuses of any kind, including forced labour or child labour, in our operations or supply chains. In particular, the Code provides the following provisions:

- **We Respect Basic Human Rights.** We expect every leader to work ethically and follow the human rights laws that apply to us. That means being careful that nobody who contributes to our business faces human rights abuses, such as: Human trafficking, Child labor, Forced or compulsory labor, or Physical punishment. Keep in mind, laws may vary from country to country, so ask the Legal Department if it's not clear how a law applies.
- **We Expect the Same Commitment from Our Business Partners.** It's important that everyone working on our behalf shares our belief in protecting human rights. If you work with our business partners, watch their work to make sure they provide high-quality products and fair and safe work environments. They must also follow applicable laws, including those related to providing conflict-free minerals.
- **We Speak Up for Human Rights.** If you suspect a potential human rights violation anywhere in our operations (or those of our business partners), we need to know. Speak up immediately

All team members are provided the Code and are annually required to attend mandatory training on the Code and acknowledge their commitment to act in accordance with the established standards by signing an acknowledgement.

Supplier Code of Conduct Policy. Under the organization's Supplier Code of Conduct, which we endeavor to include in agreements with third-parties, Suppliers are notified of the following prohibitions:

- **Child Labor.** You must ensure that child labor is not used in the performance of your work, whether or not related to organization business, consistent with organization policy and in line with the principles of applicable ILO conventions. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

- **Human Trafficking & Forced Labor.** You must comply with all laws and regulations prohibiting human trafficking. Consistent with organization policy and the principles of ILO conventions, you must not engage in the use of forced or compulsory labor (defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily). Also prohibited are other forms of forced or compulsory labor including, but are not limited to, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons.

Third-Party Screening. The organization contracts with two outside vendors to screen third-party partners and high-risk vendors/sales agents by accessing global databases to identify all relevant denied or sanctioned parties. This third-party due diligence involves thoroughly reviewing and continuously monitoring the organization's third-party partners to identify and mitigate risks related to financial irregularities, data security vulnerabilities, operational disruptions, reputational damage, potential conflicts of interest, and other legal, ethical, and compliance issues – including human rights issues.

Ethics Helpline. The organization has a comprehensive and confidential reporting tool to help maintain an ethical work environment by providing enhanced options for employees to report potential policy violations and/or misconduct. This anonymous reporting vehicle augments our other efforts to foster a culture of integrity and ethical decision-making.

Harassment and Violence Policies. The organization is committed to providing a work environment that is free from discrimination, harassment, and reprisals and is supportive of the productivity, dignity and self-esteem of every team member. The organization does not condone harassment, sexual harassment, discrimination, or violence in the workplace, as evidenced by prohibitions of such conduct in its team member handbook.

Health and Safety Policies. The organization is interested in the health and safety of all team members and is committed to the prevention of occupational illness and injury. Pursuant to the organization's workplace safety policy, the organization strives to conduct all work in a productive, safe, and high-quality manner.

Whistleblower Policies. Team members are encouraged to speak up. They may discuss their concerns with any of the senior management team and the Human Resources department. In addition, we have a whistleblower policy which states that no one may prohibit or discourage any team member from reporting possible violations of law or regulation to any government agency or entity, or from making other disclosures that are protected under the whistleblower provisions of federal law or regulation.

4. Risk of Exposure

Workforce: The organization employs approximately 1800 persons in Canada. We comply with applicable employment standards and human rights legislation in the jurisdictions in which the companies operate throughout Canada. Our hiring and recruitment procedures comply with applicable legislation to ensure a fair and equitable approach to hiring. We do not use forced or compulsory labour and prohibit the employment of children in our workforce. All of our team members are above the legal minimum employment age and are recruited and provided with working conditions and the payment of wages and benefits that comply with and/or exceed applicable laws and regulations. We have policies and procedures that aim to create a safe workplace environment. These include programs regarding health and safety, anti-harassment and discrimination, and workplace violence.

Importing: As mentioned, the organization does not produce/manufacture goods. We recognize, though, that forced and child labour risks could exist in certain supply chains, mainly from goods produced by direct suppliers. Therefore, the companies examined their 2024 supply chain spend to identify the approximate percentage of imports by country:

Vipond		Chubb Fire & Security	
Country	Percentage	Country	Percentage
United States	100%	United States	99%
N/A	N/A	China	1%

Accordingly, because the vast majority of the organization's imports were from suppliers located in the United States, which we believe to have a low prevalence of forced and child labor, and given the policies and measures already in place within the organization, the long-standing business relationships with many of its suppliers, and the experience and work ethic of its employees, the organization believes that the risk of forced labour or child labour in its activities and supply chains is low.

5. Remediation Measures

In the past two years, no occurrences of forced labour or child labour surfaced in the organization's operations or supply chain. Consequently, the organization was not required to take any measures to remediate any adverse impacts of forced labour or child labour nor did it need to take any measures to remediate the loss of income to families that potentially could have resulted from any measure taken to eliminate the use of forced labour or child labour in the organization's operations or supply chains.

6. Training

To increase our team members' understanding of these issues, the organization hosts an intranet site containing the policies mentioned above – accessible to all team members, who are expected to comply with all applicable company policies. Additionally, the organization provides annual mandatory training on its Code of Business Ethics and Conduct, which includes the Supplier Code of Conduct. By empowering our team

members with the necessary knowledge and skills, we enhance our ability to identify and prevent these practices.

Of further note, the organization trains and supports a team of ethics supervisors, identified on the intranet. The ethics supervisors' duties include reviewing and resolving reports of potential violations of policy submitted through the ethics Helpline and otherwise, providing training and resources to team members concerning key organization policies, and serving as points of contact for team members on matters related to organization policies.

In the end, the organization has a training program for its ethics and values to create a healthy, values-based work environment, which includes ethics, codes of conduct, and an anonymous and confidential reporting system.

7. Assessing Effectiveness

The organization regularly reviews various aspects of its business operations. The effectiveness of our business operations and compliance with all applicable laws, including those related to forced labour and child labour, are in the scope of these assessments. To establish a consistent understanding of our ethical standards, team members are required to annually acknowledge their receipt and understanding of the organization's codes of conduct and other applicable policies. And, as mentioned above, team members have the means to raise questions and concerns (anonymously, if preferred) or to make suggestions for improving our business operations.

We will continue to assess the effectiveness of our actions over the course of the next reporting period via the following:

- Continuing to raise awareness of human rights issues with management in each of our entities.
- Providing further awareness training and information to our procurement teams.
- Continuing to review our policies and processes and update in relation to forced labour and child labour, if necessary.
- Providing regular reminders/training on our Supplier Code of Conduct which will outline our requirements regarding the ethical standards and business conduct of our suppliers/vendors.
- Continue to screen, via third-party vendors, our suppliers/vendors to make sure they are aligned with our Supplier Code of Conduct and the law.

This Report will be made available:

- <https://chubbfs.com/ca-en>
- <https://www.vipond.ca/>
- www.publicsafety.gc.ca

8. Report Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, the Report is approved by the organization's governing body. I attest that we have reviewed the information contained in the Report for the entities listed above. Based on our knowledge, and having exercised reasonable diligence, we 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 years listed above.

I have authority to bind the companies.

Name: Stephanie McEnhill
Title: Chief Financial Officer for Vipond and Chubb Fire & Security

Date: May 31, 2025


