



2024 Forced and Child Labour Report

This Report, published in compliance with the Canadian *“Fighting Against Forced Labour and Child Labour in Supply Chains Act”*, sets out the actions that Aimia Inc. (“Aimia”) and its subsidiaries in scope for this report, Bozzetto Group and Cortland International, have taken to prevent and address forced and child labour in our businesses. The Report covers the activities of Aimia and its subsidiaries for the calendar year 2024.

Introduction

At Aimia, being socially responsible is core to our business and our purpose. We are committed to building value creation in part through robust governance across our business. Our culture guides our people to behave in an ethical way, to do the right thing, and act on any concerns they have. It’s important that all our people live up to this, and we expect the same of our suppliers. We are committed to supporting and respecting the protection of human rights. We conduct our business in a manner consistent with all applicable employment and human rights laws and regulations. We never condone, facilitate, or support the use of child or forced labour.

Our business and supply chain

Aimia is a holding company which owns two core, controlled businesses : (i) a **94.1% investment in Bozzetto**, one of the world’s largest ESG-focused providers of sustainable specialty chemicals and (ii) a **wholly-owned investment in Cortland International**, a global designer, manufacturer and supplier of technologically advanced ropes, nets, slings and tethers. In addition, the Corporation owns some non-core, non-controlled businesses which includes a **10.85% investment in Clear Media Limited**, one of the largest outdoor advertising firms in China and a **48.6% investment stake in Kognitiv**, a B2B global SAAS company inspiring customer loyalty through data personalization.

This report focuses on Aimia and its two core global businesses as its scope for this report - Bozzetto and Cortland International, which are further described below.

The Bozzetto Group, headquartered in Filago, Italy, is a leading provider of sustainable specialty chemical solutions for textiles, dispersion, and water applications. Founded in 1919, Bozzetto has grown into a global player with sales in more than 90 countries and seven production facilities located in Italy, Spain, Poland, Turkey, Indonesia, and Honduras. With more than 100 years of experience, Bozzetto serves diverse markets, including textiles, home and personal care, agrochemicals, and construction, supported by a robust portfolio exceeding 2,000 products.

The Bozzetto Group produces chemical auxiliaries for the textile industry, the construction industry, the water treatment segment, the personal care industry, the agrochemical sector, and many others.

Bozzetto specializes in the production of chemical formulations through the integration of various chemistries, such as Polyester resins, Polyacrylates, the Esterification process, Carbonic Acid Esters, Silicon derivatives, Sulphonates, Ethoxylates, Dyes, Phosphonates, and Urea- formaldehyde. Beyond product supply, Bozzetto provides technical assistance at customer sites, on-site delivery and support throughout the application process. Its business model is centered around its technical know-how and capacity to adapt products portfolio to customers’ needs, relying on a highly sophisticated R&D team able to optimize the product portfolio to serve niches. Bozzetto is compliant with the highest standards of the sector in terms of sustainable chemistry, with all ESG products certified by third-party entities that audit all the elements of Bozzetto chemistries, including raw materials, emissions, working conditions, products and processes. Bozzetto purchases from large enterprises that are required to follow REACh (Registration Evaluation Authorisation of Chemicals, Regulation N°1907/2006), the strict EU regulation to sell to Europe, which demands a stringent chemical risk assessment to protect human health and the environment. Such a regulation demands significant investment in the training of employees. Bozzetto’s non-European suppliers need to follow the same regulation. In addition, suppliers to Bozzetto’s plants outside Europe are the same vendors that follow these European standards.

Bozzetto also strictly adheres to other safety regulations to mitigate industrial risks and ensure a safe working environment. The company complies with the Seveso III Directive, which governs the prevention and control of major industrial accidents involving hazardous substances. Additionally, Bozzetto follows the Italian Legislative Decree 105/2015, which reinforces safety measures for industrial activities posing significant risks, and adheres to the Turkish Hazardous Chemicals Regulation, ensuring the responsible handling and management of hazardous substances.

Bozzetto prioritizes the safety and well-being of its employees and contractors. The company enforces strict health and safety protocols based on ISO 45001 standards, regularly auditing and updating procedures to mitigate risks. Measures include mandatory use of personal protective equipment (PPE), regular hazard assessments, and advanced safety training tailored to the specific needs of chemical plant operations.

The company mainly procures goods from Asia especially in China and in a lower measure from India and Indonesia. The other main supply hub is Europe.

Cortland International is a global leader in the design and manufacture of high-performance synthetic fiber ropes, nets, slings, and tethers, serving maritime, aerospace & defense, renewables, and industrial markets worldwide. With a diversified manufacturing footprint spanning India and the USA, Cortland International delivers a comprehensive portfolio of innovative, technology-driven solutions tailored for demanding applications.

The company's competitive strength lies in its ability to integrate world-class design, material science, and manufacturing expertise to produce durable, high-performance solutions that meet the needs of customers operating in extreme environments. Cortland International's customer-centric approach is reinforced by its longstanding technical partnerships and commitment to continuous innovation.

Cortland International operates state-of-the-art production facilities in India and North America, allowing it to combine the efficiency and scale of a cost-advantaged manufacturing base with renowned technical expertise and localized production capabilities. This dual-platform strategy enhances the company's ability to serve a global customer base, offering both high-volume, standardized products and custom-engineered solutions.

Cortland International implements comprehensive workplace safety practices and employee training programs to comply with the Occupational Safety and Health Administration (OSHA) in the U.S. and similar Indian regulations. The company undergoes regular EHS audits conducted by third-party experts to identify and mitigate potential risks.

Cortland International sources its supplies as follows: 51% from India, 8% from China, 7% from the Netherlands, 3% from Japan, and 2% from the United States. All other countries individually account for less than 1% of total supply.

Policies and due diligence processes

We have established the following policies that guide and support our commitment to sustainability, corporate social responsibility, and human rights. We have outlined below policies for the three entities in scope for this report - Aimia Inc., Bozzetto Group, and Cortland International.

A. Aimia Inc. policies

1. Code of Ethics

Our [Code of Ethics \(the "Code"\)](#) applies to Aimia Inc. as well as our subsidiaries and affiliates (collectively, "Aimia Group"). The Code explains the fundamental values and standards of behaviour that Aimia Group's shareholders and stakeholders expect in all aspects of Aimia Group's business. It indicates to clients, government organizations and the general public the high standards that all members of the Aimia Group team have undertaken to meet in fulfilling their responsibilities. Aimia Personnel are expected to comply in good faith at all times with all applicable laws, and behave in an ethical manner.

Our Code also details Aimia's commitment to maintaining a respectful workplace for all personnel and our **zero-tolerance for harassment and discrimination**. Personnel who believe that they feel discriminated against or



harassed must report such conduct to their immediate supervisor or, if such supervisor is involved in the matter, to the Chief Legal Officer and Corporate Secretary. The Code details complaint procedure and disciplinary actions. We are committed to undertaking appropriate actions against individuals who discriminate against or harass Aimia Personnel.

The **health and safety** of our employees is our priority. Fostering wellness is part of our commitment to maintain an engaged and stable workforce. Aimia is committed to meeting the requirements of any applicable laws and regulations related to health and safety. Safety and prevention of accidents is the responsibility of all personnel. Personnel are responsible for following safe operating practices in the performance of their jobs.

2. Corporate Social Responsibility Policy (CSR) Policy

Our [Corporate Social Responsibility \(CSR\) Policy](#) details Aimia's CSR principles which includes: *investing in a socially responsible and ethical manner, acting with integrity and professional conduct; implementing effective corporate governance structures; encouraging environmental stewardship; and, managing our business and resources conservatively with a long-term mindset*. Our CSR Policy promotes human and labour standards and details Aimia's commitment to "never condone, facilitate, or support the use of child or forced labour, or human trafficking practices".

3. Whistleblower Policy

Our [Whistleblower Policy](#) seeks to safeguard the integrity of the financial reporting and business dealings of Aimia, as well as our subsidiaries and affiliates (collectively, "Aimia Group"), and to support adherence to our Code of Ethics.

The Policy outlines the procedure for raising and reporting concerns anonymously, to provide protection to individuals, It also establishes a process for investigating reported issues.

Aimia Group determines the appropriate steps to undertake to determine what, if any, corrective and disciplinary actions will be taken in respect of any reported incident. This may include input from the Board, its committees or their respective chairs, the Chief Executive Officer or the Chief Financial Officer.

Aimia does not tolerate acts of retaliation or retribution, including termination, demotion, transfer, denial of promotion, discipline, discrimination, harassment, suspension, threats or any other discriminatory actions, against any personnel or others who make a good faith incident report.

B. Bozzetto Group policies

1. Code of Conduct

Bozzetto's Code of Conduct states the ethical commitments and responsibilities that guide the performance of business activities and corporate operations undertaken by Bozzetto, its subsidiaries, and their directors and employees. This code outlines clear expectations for ethical behavior, compliance with laws and regulations, anti-corruption measures, and respect for human rights. The code is disseminated across all levels of the organization and is incorporated into supplier agreements to ensure adherence throughout the supply chain.

The Code protects individuals' freedom in all forms and rejects any form of violence. The company complies with any applicable laws on personal rights, with specific regard to the moral and physical integrity of its personnel. As part of its values and ethical principles, it has zero tolerance for the exploitation of child labour and we safeguard the respect of workers' rights, the freedom of trade unions, and the rights of association.

The Code also details its commitment to health and safety. The health and safety of workers is paramount to Bozzetto. Bozzetto employs the best efforts and the highest commitment to promote health and safety in our workplace. It takes appropriate measures to avoid any possible risks that may arise from the operation of our



business and, where that is not possible, it adequately evaluates the existing risks in order to counter them right to the source and guarantee their elimination, or if that is not possible, their management.

2. Whistleblower Policy

Bozzetto encourages a culture of transparency and accountability through its [whistleblower policy](#). This policy provides employees and stakeholders with secure, confidential channels to report unethical or unsafe practices without fear of retaliation. It serves as a cornerstone for building a corporate culture that operates with integrity and responsibility. Bozzetto has adopted appropriate measures to manage reports of misconduct and illegal conduct in a lawful and transparent manner.

The measures for handling reports enable employees and all those who have professional relationships with Bozzetto to report misconduct and illegal activities, contributing to the health and ethical development of the company. All reports are investigated promptly, taking care to ensure protection and discretion for those who report misconduct, avoiding any fear of discrimination or repercussions. To this end, Bozzetto has established an independent [platform](#) to guarantee confidentiality to whistleblowers.

C. Cortland International policies

Cortland International is the result of an acquisition made by Aimia's subsidiary of Cortland Industrial, LLC on July 11, 2023. Given the different geographic location of Tufropes and Cortland Industrial and, contracts and policies have not been fully integrated yet and may differ. For that reason and for clarity purposes, and despite that both Tufropes and Cortland Industrial are doing business under the name of Cortland International, we may refer to Tufropes and Cortland Industrial in this Report to precisely describe the various policies applicable at the subsidiaries level.

1. Employee Handbook

The Employee Handbook applies to all employees, as compliance with Cortland's policies is a condition of employment. The Handbook guarantees equal employment opportunities for employees and employment applicants and prohibits unlawful discrimination based on race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status, or any other classification protected by law.

Cortland is dedicated to creating and **maintaining an atmosphere of diversity and inclusion for all**. Prospective employees and current employees alike are expected to treat each other and be treated with respect and dignity.

The company is also committed to providing a work environment free of sexual or any form of unlawful harassment or discrimination. Any employee or contract worker who violates this policy will be subject to disciplinary action, up to and including termination of their employment or engagement. To the extent a customer, vendor or other person with whom Cortland does business engages in unlawful harassment or discrimination, we will take appropriate corrective action.

Employees or contract workers are encouraged to promptly report any harassment or discrimination experienced or witnessed to their supervisor or any other member of management.

The Handbook also provides guidance on the employment of minors. the company **strictly complies with the child labour provisions** of the U.S. Government Fair Labour Standards Act (FLSA), which protects the educational opportunities of youth and prohibits their employment in jobs that are detrimental to their health and safety.



Cortland is committed to providing a **safe workplace and healthy environment**, free of recognized hazards that cause or are likely to cause death or physical harm to our employees. All employees have the responsibility to take steps to promote safety in the workplace. Employees are expected to promptly report all unsafe working conditions and practices, accidents, near misses and injuries, regardless of how minor, so that any potential hazards can be corrected.

Awareness sessions specifically addressing child labor have not yet been conducted for employees. However, Cortland International policies have been updated to include whistleblower guidelines in the Employee Handbook, reinforcing our commitment to ethical labor practices and providing clear reporting mechanisms.

2. Cortland Supplier Code of Conduct

Cortland's goal is to partner with suppliers to deliver value-for-cost procurement for the company and our customers, and to demonstrate responsible supply chain management. To this end, the company has set out expectations of suppliers in its Supplier Code of Conduct, which suppliers are required to acknowledge.

The company believes everyone should be treated with dignity and respect. Accordingly, it requires suppliers to adhere to all appropriate labour laws and regulations, as well as the conventions of the [International Labor Organization \(ILO\)](#), the [Universal Declaration of Human Rights](#), and the [United Nations Guiding Principles on Business and Human Rights](#), in order to preserve and safeguard human rights. Suppliers must not use child labour (as defined by local law).

Forced or bonded labour, human trafficking, forced prison labour, or involuntary labour through threat, force, coercion, confiscation of government identification, or fraudulent claims are all strictly prohibited by our supplier code of conduct.

3. Tufropes Supplier Code of Conduct

Tufropes is committed to building strong and lasting relationships with suppliers. The Supplier Code of Conduct outlines the principles and standards that suppliers are expected to adhere to in their business practices.

Suppliers are required to ensure a safe and healthy working environment for their employees, contractors, and visitors and comply with all applicable safety regulations. In addition, suppliers are required to provide adequate training and resources to employees to prevent accidents and occupational hazards. Suppliers are also required to respect the labour rights of all employees and maintain a workplace free from all forms of harassment, including sexual harassment. The Supplier Code of Conduct prohibits the use of child labour or forced labour.

4. Cortland International Whistleblower Policy

Cortland's Whistleblower Policy seeks to foster a culture of ethical conduct and integrity within the company and establishes a safe and confidential reporting mechanism that empowers employees, contractors, and other stakeholders to disclose concerns without fear of reprisal.

Retaliation against any whistleblower is strictly prohibited. Whistleblowers will be immune from disciplinary measures or any adverse impact on their rights, benefits, or future opportunities.

This Whistleblower Policy also applies to eligible employees of Tufropes in India. All employees have the right to report concerns or wrongdoing as outlined in this policy. Suggestion boxes are kept at different locations wherein employees can also report any concern anonymously.



Forced labour and child labour risks

Aimia Inc. is working to further develop policies and build processes to support the assessment of the risks of forced and child labour across the business, including that of our subsidiaries and their supply chains.

Bozzetto Group employs a broad evaluation system to assess supplier risks. The Group requires all suppliers to acknowledge and adhere to its Code of Ethics, which explicitly prohibits forced and child labor. To ensure compliance, both on-site and desk audits are conducted on a selected number of suppliers.

Cortland International US operation undertakes quality and financial assessment of its suppliers using its quality management (QMS) system. The US subsidiary assesses suppliers to determine if they have the required capability, equipment, and capacity to produce the product sourced, including their quality assurance processes. Since the last report, Cortland International has made significant progress in strengthening its supplier assessment process and reinforcing adherence to ethical labor standards. Human and labor rights risk questions are being integrated into the Contractor/Vendor Module, with the updated framework expected to be released by the end of March 2025. Additionally, the Purchasing team has distributed the Supplier Code of Conduct acknowledgment to all critical vendors, with over 50% already confirming their compliance. Efforts are ongoing to obtain responses from the remaining vendors, ensuring full alignment with our commitment to responsible sourcing and international labor standards.

There are opportunities to enhance internal documentation to more explicitly address the issue of child labor. However, the Supplier Code of Conduct clearly defines our commitment to labor practices and human rights, emphasizing the prohibition of both forced and child labor.

The company also intends to perform audits and is currently defining the scope of these audits. It will explore options to build on its current systems to capture risks of forced and child labour as part of its supplier assessment process.

Cortland International fully complies with the Modern Slavery Act and International Labour Organization (ILO) conventions, ensuring ethical labor practices across the supply chain. In India, where child labour is legally banned, signboards are installed in prominent places of the plants to convey this information. The company has also published the India-level ethics policy. In addition, the operation in Southeast Asia has established an HR policy defining working hours, leave, and other terms and conditions of employment. Attendance is monitored through a face recognition system, which prevents individuals under the age of 18 years from entering its facilities as the company system locks in attendance and records it in SAP.

Remediation measures

Aimia and its subsidiaries are devoted to achieving our commitment to never condone, facilitate, or support the use of child or forced labor, or human trafficking practices in our business. In the event that we identify any evidence of forced and child labor in our business, we will take effective measures to address such a situation in accordance with relevant laws and regulations. We will also work with affected parties to provide appropriate remediation and support, and to prevent recurrence of the issue.

Training

In line with the requirements of the Act, Aimia and its subsidiaries will continue to explore options to further build awareness and provide training to relevant employees on the risks of forced and child labour to our business.

Bozzetto Group provides training related to safety, our whistleblower policy, and the environment for personnel working in our plants (in compliance with applicable regulations).



At Tufropes, all employees are provided training on our prevention of sexual harassment policy which also includes the procedure for internal report and investigation.

Assessing effectiveness

In ensuring our business complies with the requirements of the Act and to support Aimia and its subsidiaries in achieving our commitment to zero-tolerance for forced and child labour, we intend to assess the effectiveness of our measures in preventing and reducing these risks and to evolve our program as necessary.

Future Plans

- Integrate and standardized the compliance programs and policies at the subsidiaries level
- Further enhance our supplier assessment process to include human and labour rights risk questions (including questions regarding forced and child labour)
- Receive acknowledgements from all critical suppliers confirming conformity with our supplier code of conduct which requires compliance with international human rights and labour standards.
- Provide upskilling and awareness sessions on the risks of forced and child labour to our employees
- Update and enhance our policies (i.e., Code of Ethics) to reinforce our commitment to zero tolerance for forced and child labour, and better support stakeholders to bring forward risks related to forced and child labour (i.e., whistleblower policy).

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.



Steven C. Leonard
President and CFO
Aimia Inc.

Signature

"I have the authority to bind 'Aimia Inc.'"

