

Mark Anthony Group Forced & Child Labour Act Statement

This report is submitted in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”) and outlines the measures undertaken by Mark Anthony Group Inc. (“Mark Anthony Group” or “the Company”) during the reporting year ended March 31, 2025. The entity covered by this report is Mark Anthony Group Inc. (Business Number 10371 4010).

Mark Anthony Group affirms its commitment to upholding human rights and to preventing all forms of forced labour or child labour within its operations and supply chain. The Company acknowledges the influence it exercises through its business practices and is committed to promoting ethical labour standards throughout its value chain.

This report describes the activities carried out during the reporting year to identify, assess, and address the risks of forced labour or child labour. It also outlines areas identified for potential improvement in future reporting periods, which are presented separately from reporting year disclosures.

1. Structure, Activities & Supply Chain

Mark Anthony Group is a privately held Canadian company incorporated in 1972. It operates as a diversified producer and distributor of alcoholic beverages, with a portfolio that includes luxury wineries and other beverage brands. The Company conducts business across multiple jurisdictions and maintains operations in Canada and internationally.

Mark Anthony Group’s supply chain includes both domestic and international suppliers, spanning raw materials, packaging, manufacturing, and logistics services. The majority of procurement expenditures are concentrated in Canada and the United States.

2. Policies & Due Diligence Processes

Mark Anthony Group adheres to a stringent business ethos, prioritizing engagement with premier suppliers and professionals. This philosophy, coupled with Mark Anthony Group’s strategy of cultivating deep relationships with its vendors, serves as a fundamental safeguard against the risks of forced or child labour, as well as other unethical practices within its operations and supply chain.

During the reporting year, Mark Anthony Group undertook initiatives to identify and mitigate the risk of forced or child labour across its operations and supply chain. These actions form part of the Company’s broader commitment to responsible sourcing and ethical labour practices.

Internal Risk Assessments: Mark Anthony Group conducted internal assessments across its operations and supply chain to evaluate potential exposure to forced or child labour risks. This process included workshops with cross-functional stakeholders, which facilitated supply chain mapping and risk identification.

Engagement with External Consultants: To supplement internal activities, Mark Anthony Group engaged external experts to conduct a supply chain risk assessment. This assessment helped enhance the Company’s understanding of sectoral and geographic risk factors relevant to its supplier base.

Seasonal Agricultural Worker Program (SAWP): Mark Anthony Group participates in the Government of Canada’s Seasonal Agricultural Worker Program (SAWP) and is in alignment with all related policies and standards. The Mark Anthony Group receives regular audits on employment conditions to ensure alignment. Consistent with the prior year, over 70% of employees that take part in this program return for work with the Company the following year, indicating a positive working environment.

To enhance the working environment, during the reporting year the Company hired a locally-based Vineyard Coordinator. This newly created permanent position is a liaison to strengthen responsiveness to vineyard worker needs.

Training & Supplier Contract Revisions: Training to identify potential exposure to forced or child labour was delivered to internal supply chain teams during the reporting year. As a direct outcome of this training, Mark Anthony Group reviewed its supplier contracting practices. The Company is in the process of revising its contractual language regarding supplier expectations. These updates are intended to reinforce conduct expectations and promote alignment with internationally recognized labour standards.



3. Forced Labour & Child Labour Risks

During the reporting year, Mark Anthony Group undertook a risk assessment to evaluate potential exposure to forced and child labour within its supply chain. The assessment incorporated guidance and data from multiple credible sources, including the Walk Free Global Slavery Index and the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor. These sources were selected to inform a geographically focused, evidence-based approach to risk identification.

Risk Assessment Findings: The assessment identified that no industry is entirely exempt from this risk and that vulnerabilities may exist in regions where legal protections and enforcement are limited. The Company assessed both product-specific and geographic risks in its procurement activities, using supplier data and third-party indicators to guide this analysis.

The majority of the Company's supplier expenditures were concentrated in Canada and the United States, jurisdictions assessed as low risk for forced and child labour. However, based on the geographic risk analysis conducted during the reporting year, elevated risks were identified in relation to select sourcing activities in India and Panama. These countries were highlighted due to their inclusion in recognized risk indices and their prevalence of forced or child labour. Imports from these jurisdictions represented an immaterial proportion of the Company's supplier spend (less than 0.5%), and the associated risk was assessed as low.

The Company also referenced the U.S. Department of Labor's list to screen goods potentially linked to forced or child labour. When cross-referenced with current procurement data, no high-risk products were identified as being sourced during the reporting year.

Overall, the risk assessment findings indicate that Mark Anthony Group exposure to forced and child labour remains low. This reflects both the jurisdictions from which the Company sources most of its goods, and the controls in place to monitor and evaluate supplier risk.

4. Remediation Measures

During the reporting year, Mark Anthony Group did not identify any instances of forced labour or child labour within its operations or supply chain. As a result, no remediation measures were required or undertaken.

In alignment with the United Nations Guiding Principles on Business and Human Rights, we recognize the importance of having robust remediation measures in place. While no instances of forced or child labour within our operations or supply chain have been identified, should they be in the future, immediate action will be taken. The Company will engage directly with affected individuals and stakeholders to assess the impact and implement suitable remediation measures. Recognizing the complexity of global supply chains, Mark Anthony Group commits to collaborate with our suppliers and other partners to ensure remediation measures are effectively implemented and consistent with international standards.

5. Remediation of Loss of Income

Mark Anthony Group did not identify any instances of forced or child labour within its operations or supply chain during the reporting year. Accordingly, no remediation measures related to loss of income for affected individuals or communities were required or implemented during the reporting year. Nonetheless, Mark Anthony Group acknowledges the importance of being prepared to respond promptly and effectively should such issues arise in the future, including measures to address any loss of income among vulnerable populations.



6. Training

All employees are required to sign the Company’s Code of Conduct upon commencement of employment, with periodic recertification required. While not a substitute for formal training, the Code establishes the standards with which every MAG employee is expected to conduct themselves. The Code states that every employee, as a representative of the Company, has an obligation to conduct the Company’s operations with the highest standards of integrity, ethical conduct, and good corporate citizenship as a condition of employment.

During the reporting year, Mark Anthony Group engaged external experts to deliver mandatory training to its supply chain staff. The training focused on identifying and managing the risks of forced and child labour and included modules on country-specific risk indicators, operational and product-based vulnerabilities, red flag identification, and mitigation strategies. This initiative reinforced expectations set out in the Company’s Code for employees to conduct Company operations with the highest standards of good corporate citizenship.

In addition to the completed training, Mark Anthony Group is exploring the development of further targeted training for employees with roles in contracting and purchasing, in fiscal 2026. This future training is intended to reinforce awareness of the risks of forced and child labour as the Company’s global supply chain continues to evolve.

7. Assessing Effectiveness

As of the close of the reporting year, Mark Anthony Group had not established formal policies or procedures to assess the effectiveness of its efforts to prevent forced and child labour within its operations or supply chain. The Company recognizes the importance of evaluating the impact of its mitigation measures and has identified this as an area for future development.

To support the advancement of internal oversight, Mark Anthony Group is considering the adoption of performance indicators that would enable more structured monitoring in future reporting periods. The indicators under review include:

- i. Total hours dedicated to employee training and awareness initiatives
- ii. Number of reported cases involving forced or child labour
- iii. Number of such cases resolved or addressed through internal protocols
- iv. Number of supplier contracts amended or established with specific anti-forced and anti-child labour clauses
- v. Number of suppliers providing written attestations of compliance with applicable labour laws

These metrics, once implemented, are expected to inform a more comprehensive evaluation of the effectiveness of the Company’s processes in monitoring and mitigating forced and child labour risks across its operations and supply chain.

8. 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 listed above, and that it has been approved by the governing body of the entity. 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.

May 19, 2025

Date

Victor Giacomini

Authorized Signing Officer
I have authority to bind the corporation

