



## **Fighting Against Forced Labour and Child Labour in Supply Chains Act**

**S.C. (Statutes of Canada) 2023, c. 9**

**Report**

**May 31, 2024**

Reporting entity's legal name:	<b>Superior Group of Companies, Inc.</b>
Financial reporting year:	<b>2023</b>
Identification of a revised report:	<b>N/A</b>
Business number(s), if applicable:	<b>N/A</b>
Identification of a joint report, if applicable:	<b>N/A</b>
Identification of reporting obligations in other jurisdictions:	<b>N/A</b>
Entity categorization according to the Act:	<b>Corporation that does business in Canada</b>
Sector/industry:	<b>Apparel and branded product manufacturing and distribution and contact center operations</b>
Location:	<b>Florida, United States of America</b>

### ***Preventing and Reducing Risks of Forced Labor and Child Labor in Production***

Superior Group of Companies, Inc. ("SGC") consistently strives to conduct business with the highest degree of integrity and honesty. As an international business with locations around the world, SGC is dedicated to upholding human rights, promoting equitable labor practices, and ensuring that all of its vendors and suppliers adhere to SGC's ethical standards around the globe. SGC maintains company-wide policies and procedures to accomplish this.

SGC requires all of its vendors and suppliers to comply with SGC's Code of Business and Ethical Conduct and Supplier and Vendor Compliance Manual. In order to conduct business with SGC, all suppliers and vendors must affirm they are not in violation of any labor laws including the use of forced or child labor, as required by the Code of Business and Ethical Conduct and the Supplier and Vendor Compliance Manual. All suppliers and vendors must agree to allow SGC to enter their premises for the purpose of inspecting work conditions to ensure compliance with the Code of Business and Ethical Conduct.

As detailed below, SGC does not tolerate the use of child labor in any of its global operation or facilities, nor the exploitation of children or their engagement in unacceptably hazardous work. Nor does it tolerate



the use of forced or involuntary labor. Consequently, all suppliers and vendors are expected to uphold the same standards in fair labor practices. SGC's policies are intended to ensure that no exploitative labor practices occur in its supply chain.

### ***Business Structure, Activities, and Supply Chains***

Established in 1920, SGC, a Florida, United States of America corporation doing business in Canada, specializes in the production and distribution of products and performance of services across three segments: Healthcare Apparel, Branded Products, and Contact Centers.

SGC's Healthcare Apparel segment manufactures and sells healthcare apparel under the Fashion Seal Healthcare, Wink, and Carhartt brands. This segment sells healthcare service apparel to retailers and others, primarily in the United States.

The Branded Products segment sells custom branded products through its BAMKO and HPI divisions. Branded products are manufactured through third parties or in SGC's own facilities. This segment currently has sales offices in the United States, Canada, Brazil, the United Kingdom, and Colombia, and maintains support services in China and India.

The Contact Centers segment offers business process outsourcing and call-center support services through multiple entities under the name The Office Gurus. These companies are located in El Salvador, Belize, Jamaica, Dominican Republic, and the United States, and primarily provide support services to North American customers.

As of December 31, 2023, SGC had approximately 6,900 employees worldwide, of which approximately 830 were employed in the U.S. and approximately 6,070 were employed in other countries. The Contact Centers segment accounts for the Company's largest labor force at approximately 4,300 full-time employees as of December 31, 2023.

SGC primarily imports goods into Canada within the Branded Products segment. BAMKO Merch Inc., a wholly owned subsidiary of BAMKO, LLC, is incorporated in Canada. SGC maintains a BAMKO Canada sales office in Vernon, British Columbia.

SGC, including specifically its Manufacturing and Distribution Department, maintains expansive global manufacturing networks and robust supply chains. SGC works to ensure the health and resilience of its supply chains through, in part, regular supplier and vendor assessments that identify and mitigate risks in production. To promote and enforce SGC's commitment to corporate responsibility, all supplier and vendor policies are required to reflect the same standards upheld by SGC.

### ***Policies and Due Diligence Processes in Relation to Forced Labor and Child Labor***

Under no circumstances will SGC tolerate the use of forced labor or child labor in the manufacturing of product, nor will SGC tolerate the trafficking, physical punishment, or abuse of any worker. To ensure compliance with its policies and rules, SGC maintains the right to audit or inspect all supplier and vendor facilities. Suppliers and vendors must also allow unannounced inspections or audits of facilities to verify compliance with SGC's Supplier and Vendor Compliance Manual, including permitting confidential employee interviews and providing copies of records as requested.



SGC conducts regular supplier and vendor audits to ensure compliance with relevant policies and laws using the Worldwide Responsible Accredited Production (WRAP), Business Social Compliance Initiative (BCSI), Sedex Members Ethical Trade Audit (SMETA), and other auditing protocols.

These regularly conducted audits seek to ensure manufacturing partners are upholding SGC's standards, including related to fair labor and wages.

Suppliers and vendors are required to disclose the identity and physical location of all factories where production occurs. Furthermore, all suppliers and vendors must disclose in writing any conditions that are in conflict with SGC's Supplier and Vendor Compliance Manual.

SGC further specifies within the Supplier and Vendor Compliance Manual what would be considered fair labor practices. For example, as a part of the hiring process, workers must be provided with a written employment agreement in their native language that describes the terms and conditions of employment prior to working. Workers cannot be required to surrender their identity papers or other personal documents as a condition to employment. Workers must be free to leave the workplace at the end of their shift and to resign without repercussions. All of SGC's suppliers and vendors are required to uphold these same principles.

#### ***Parts of Business Carrying Risk of Forced Labor***

SGC is an international business that works with suppliers and vendors globally in the manufacturing and distribution of products. As such, SGC understands there are sectors of the business that carry the risk of forced labor. These are due to:

- The sector and industry SGC operates in;
- The types of products SGC produces, sells, distributes or imports;
- The locations of SGC's activities, operations, and factories;
- The types of products SGC sources;
- The existence of tier two and tier three suppliers and vendors; and
- SGC's use of outsourced, contracted, or subcontracted labor.

Regardless, SGC does not tolerate the use of child labor or forced labor by any supplier or vendor.

#### ***Measures Taken to Remediate Forced Labor, Child Labor, or Loss of Income by the Vulnerable***

As of the date of this report, to its knowledge, SGC has never needed to take measures of remediation due to the use of forced labor or child labor in its supply chains, nor has the company needed to remediate loss of income to families impacted by the elimination of forced or child labor.

If forced labor is found in the supply chain, SGC's suppliers or vendors would be required to rectify any noncompliance issues upon discovery of such noncompliance. In such an instance, SGC would monitor the progress of corrective actions taken to remedy noncompliance and require evidence of those measures as part of a formal corrective and preventative plan.

#### ***Training Provided to Employees***



Ensuring all employees are trained on ethical business behavior is crucial to SGC's ethical business practices. Employees are provided regular training on ethical business behavior and SGC's Code of Business and Ethical Conduct, which expressly prohibits the use of forced or child labor in the supply chain.

Within 90 days of their start date, new employees are required to complete initial training on SGC's Code of Business and Ethical Conduct, which is refreshed bi-annually for all employees. This training, and the policies laid out during such training, applies entity-wide and to all SGC employees. This training is developed and maintained internally in consultation with external organizations.

SGC's Code of Business and Ethical Conduct is reviewed regularly for accurateness to ensure compliance procedures are kept up to date. Additionally, the Code of Business and Ethical Conduct promotes prevention of unethical practices by outlining SGC's Whistle Blower Policy, which describes how employees may contact a third-party anonymous hotline to report ethical concerns.

***Entity's Assessment of Effectiveness in Preventing Forced Labor in Supply Chain***

SGC continues to uphold its commitment to preventing child labor and forced labor in its supply chains. SGC has a zero-tolerance policy as to the use of child or forced labor in production and contractually requires all suppliers and vendors to uphold the same standard.

In an effort to ensure SGC's policies against child labor and forced labor are met by suppliers and vendors, SGC conducts social compliance audits and inspections at their facilities on a regularly scheduled basis and reserves the right to conduct unannounced visits. SGC maintains the right to inspect and audit all facilities and business records to verify compliance with the aforementioned policies.

As of the date of this report, SGC has never experienced any issues with vendors or suppliers wrongfully utilizing forced labor or child labor in the manufacturing process. Nevertheless, SGC requires strict compliance with the Company's policies and is sufficiently prepared to address and rectify any issues should they arise.

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SGC is dedicated to ensuring all business practices are fair and equitable, including the regulation of fair labor practices among all suppliers and vendors. SGC maintains a proactive approach to complying with fair labor and human rights policies by conducting regular trainings, audits, and monitoring activities to ensure continuous progress.

**Approval and Attestation**

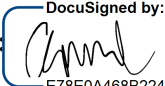
*In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.*

*I have the authority to bind Superior Group of Companies, Inc.*

**Full Name:** Charles Sheppard

**Title:** Sr. Vice President, Global Sourcing & Distribution

**Date:** May 31, 2024

**Signature:**  DocuSigned by:  
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