



Canada's Modern Slavery Report 2025

Introduction

This Modern Slavery Report addresses the period from October 1, 2024 to September 30, 2025 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) — Bill S-211. The report is made on behalf of Evora Equity Inc. ("Evora Equity").

Evora Equity is a western Canadian based private equity firm focused on acquiring and growing operating businesses within the general health and wellness industry. During the reporting period, the company held majority control positions in two platform investments:

- Evora Respiratory LP (sold operations effective July 31, 2025)
- Kintec Footlabs Inc.

Note: Evora Respiratory LP Group (including all subsidiaries) was sold effective July 31, 2025. ERLP operated throughout the majority of the FY2025 reporting period (October 1, 2024 through July 31, 2025) and its activities and supply chain information for that period are reflected in this report.

Evora Equity also holds a minority equity position in Passion Dental Group Inc. ("Passion"). The activities and supply chain risk of that company are not reflected in this report due to the minority ownership position. Additionally, Passion is a dental services corporation, operating in an industry not targeted for participation in the reporting related to Canada's Modern Slavery Act.

Evora Equity is committed to respecting human rights across all of our business operations in accordance with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. Without limiting the foregoing, we do not utilize or permit child labour, forced labour or other abusive or unsafe working conditions.

Structure, Activities and Supply Chains

Evora Equity is the parent company and held majority equity positions in the following entities during the FY2025 reporting period:

- Evora Respiratory LP (sold July 31, 2025)
- Kintec Footlabs Inc.

Evora Equity also holds a minority equity position in Passion Dental Group Inc.

Evora Respiratory LP

Note: Evora Respiratory LP Group was sold effective July 31, 2025. The following describes operations during the portion of the reporting period in which ERLP was active.

Evora Respiratory LP ("ERLP", "Evora Respiratory" or "the Partnership") was engaged in the business of providing sleep and respiratory products and therapy services to individuals in western Canada. The Partnership operated over 30 clinics across the provinces of Saskatchewan, Alberta and British Columbia.

The ERLP head office was located at Suite 300, 4954 Richard Road SW, Calgary, Alberta, T3E 6L1. All employees were subject to the Partnership employment policies including the Code of Conduct captured within the Employee Handbook as well as the Policies and Procedures Manual.

The Partnership sourced materials and finished goods utilized to treat patients, including disposable measurement and examination tools, equipment used to measure sleep and breathing characteristics, and manufactured devices and accessories sold to patients for sleep and respiratory therapy purposes.

Finished resale goods, which include a significant portion of electronics, were sourced from a handful of main suppliers who are global in nature and directly manufacture their goods around the world, including significantly in Asia.

Kintec Footlabs Inc.

Kintec Footlabs Inc. ("Kintec" or "the Company") operates a chain of retail stores utilizing the Kintec, Walking Mobility Clinics ("WMC"), Stand Your Ground ("SYG") and Kim Rau & Associates ("KRA") banners, focused on services related to the provision of orthotics, bracing, performance footwear and accessories.

The company is also engaged in the manufacturing and marketing of orthotics and the development and provision of orthotics retailer operating software. The minority owners in Kintec include the original owner-operator and various members of the Kintec management team. Head office is located at Suite 300, 4954 Richard Road SW, Calgary, Alberta T3E 6L1, with business operations centred in B.C. and stores located across B.C. (Kintec) and Southern Ontario (Kintec, WMC, SYG and KRA). Manufacturing of orthotics is completed at the manufacturing and business centre located at 13465 King George Blvd., Surrey, BC, V3T 2T8.

Key footwear and apparel products are sourced from major, well-known companies in the industry (e.g., Nike, ASICS, Deckers, New Balance, Brooks, Columbia Sportswear). Bracing products and accessories are also sourced from well-established market-leading providers. In the case of orthotics — mainly manufactured internally — components and materials are sourced from a handful of vendors who in turn source their raw materials from a global set of providers. Consequently, the supply chain is comprised of both domestic and international vendors.

From an operational perspective, all employees of both groups are located in Canada, a country considered to be at low risk of forced labour incidences and vulnerability. The company follows labour practices as established by law in Canada and pays fair wages based on provincial regulations and industry norms.

In total, the operations of the two businesses during the reporting period included over 300 employees, working on either a full-time, part-time, or casual basis across approximately 55 retail and clinic locations.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Modern Slavery is identified by the International Labour Organization (ILO) as an umbrella term covering practices such as forced labour, debt bondage, forced marriage, and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power. Evora Equity supports this definition and seeks out investigative methods to identify such transgressions.

Evora Equity is aware that modern slavery risks may possibly exist within our combined supply chain and has implemented due diligence processes to identify and address these risks. Our due diligence process includes the following:

Risk Assessment:

We conduct a risk assessment of our suppliers to identify potential modern slavery risks or other human rights violations. This includes reviewing internet articles and reference materials, and any modern slavery act statements submitted in other jurisdictions (e.g., Australia, the UK, California). Reference sources include information from authorities such as the U.S. government, NGOs and industry partners such as ILO Better Work, and The Institute for Human Rights and Business; or industry bodies such as the Social Responsibility Committee of the American Apparel & Footwear Association (AAFA) and the Sustainable Apparel Coalition (SAC).

Supplier Engagement:

We engage with our suppliers to communicate our expectations and requirements regarding modern slavery risks. This includes the communication of our Business Partner Code of Conduct.

Remediation:

We work with our suppliers to address any identified risks and, to the extent possible, support them in developing remediation plans to improve their compliance with our policies.

Monitoring:

We monitor our suppliers' compliance with our policies on an ongoing basis to ensure they maintain their commitment to respect human rights.

During FY2025, Evora Equity assessed a total of vendors across the ERLP and Kintec business segments. Modern Slavery Statements ("MSS" - statements of a company's policies and actions relating to forced labour and child labour risks) were obtained and reviewed for external vendors, collectively covering a significant portion of total FY25 vendor spend. The reviewed statements span multiple jurisdictions including the UK Modern Slavery Act 2015, Australian Modern Slavery Act 2018, Canadian Bill S-211,

Norwegian Transparency Act, French Duty of Vigilance Law, and the Dutch International Responsible Business Conduct Act.

Disclosure and Communication:

Annually, we will report on our findings and activities regarding modern slavery risks, obtain acknowledgement and approval from our Board of Directors on this work, and seek to implement continuous improvement policies and processes.

Our policy with respect to the use of child or forced labour is explicitly outlined in our Business Partner Code of Conduct. In short, we will tolerate no use of forced or child labour in our supply chain and where instances are identified, will monitor the remediation actions of our vendors to ensure they are eliminated promptly.

Parts of Its Business and Supply Chains That Carry a Risk of Forced Labour or Child Labour

ERLP and Kintec operated within subsets of the electronics and garment (footwear) industries respectively. These industries have been identified as at high risk for forced or child labour practices by the USA's Department of Labour's Bureau of International Labour Affairs (ILAB). In particular, and according to ILAB and the Walk Free Global Slavery Index, Evora Equity is aware that products it retails may be manufactured in countries identified as at material risk for potentially utilizing forced or child labour.

Business Entity / Sector	High-Risk Manufacturing Countries
ERLP – Electronics †	China*, Dominican Republic, India, Indonesia, Malaysia, Mexico, Romania, Thailand, Turkey (High)
Kintec – Apparel & Accessories	Brazil, Cambodia, China*, Colombia, Dominican Republic, El Salvador, Georgia, Guatemala, Honduras, India, Indonesia, Jordan (High), Lithuania, Malaysia, Mexico, Moldova, Nicaragua, Pakistan (High), Philippines, Sri Lanka, Thailand, Turkey (High)
Kintec – Footwear & Equipment	Bangladesh, Brazil, Bosnia & Herzegovina (High), Bulgaria, Cambodia, China*, Croatia, Dominican Republic, Honduras, India, Indonesia, Mexico, Myanmar (High), Pakistan (High), Philippines, Sri Lanka, Thailand, Ukraine (High)
Kintec – Orthotics	China*

† Evora Respiratory LP Group was sold effective July 31, 2025. ERLP supply chain risk information reflects the period during which it was operational (October 1, 2024 – July 31, 2025).

* While China is rated Low-Moderate in the 2023 Walk Free Global Slavery Index overall, there are regions in the country (Uyghur region) where prevalence is documented to be significantly higher. All ratings based on Walk Free 2023 Global Slavery Index.

Based on total vendor spend, the operating entities can review and assess modern slavery statements from the following proportions of their tier 1 supply chain organizations:

- Evora Respiratory LP > 90% (>87% 2024)
- Kintec Footlabs Inc. > 62% (>60% 2024)

Evora Equity's operating companies review publicly available information regarding the risks noted above. In particular, the operating entities are able to review and assess modern slavery statements from a material proportion of their tier 1 supply chain organizations. In addition, Evora Equity is able to review related policies and actions that arise out of those vendors' assessments of the risks of child and forced labour as noted in their respective reports. Examples of such actions include the acceleration of tier 1 and tier 2 supplier facility audits undertaken by major footwear and medical device suppliers, and the implementation of Vendor Codes of Conduct across our combined supply chain.

Measures Taken to Remediate Forced Labour or Child Labour

Historically, aside from monitoring for information that may be available in the general press and assessing what actions, if any, should be taken in recognition of adverse events, Evora Equity has not undertaken direct measures to remediate forced or child labour. It must be highlighted, however, that Evora Equity is currently not aware of any incidences of forced labour or child labour transgressions in its supply chain during the FY2025 reporting period.

However, our vendor assessment process identified active labour-related non-compliance findings through Tier 1 vendor audit programs, which are being actively monitored and managed through corrective action plan processes.

Remediation frameworks remain an area for development across several of our tier 1 vendors as well as internally. Moving forward, Evora Equity will continue to develop response policies to ensure we are ready to react and remediate should incidences of forced labour be identified.

Measures Taken to Remediate Loss of Income to Vulnerable Families

To date, Evora Equity is not aware of instances of child labour or forced labour in its supply chain. It thus follows that Evora Equity's operating companies have not been able to identify any instances of loss of income of vulnerable families that result from measures taken to eliminate the use of forced or child labour in their supply chains. Practically, due to its size and lack of market influence, there is limited direct action Evora Equity can take outside the use of moral suasion in such efforts. Evora Equity intends to continue monitoring its vendors for the potential of these types of risks and hold discussions with vendors as appropriate.

Training Provided to Employees on Forced Labour and Child Labour

Training sessions for procurement teams have been completed to heighten their awareness of our anti-slavery policy and to enhance awareness of how to mitigate modern slavery risks, as well as to promote understanding of our internally developed due diligence processes.

Evora Equity believes in the importance of robust risk mapping processes, compliance with the anti-slavery policy, and due diligence processes in order to drive improvements. Steps have been taken to align — to the extent practicable — modern slavery related risk management practices across Evora Equity entities by encouraging dialogue between key internal stakeholders and by broadening the cross-entity responsibilities of the local procurement teams.

Effectiveness in Ensuring Forced Labour and Child Labour Are Not Being Used

Given that Evora Equity's operating businesses are small and lack the resources to materially impact global supply chains, in addition to its own codes of conduct to govern domestic employee operations, it relies significantly on the efforts of its Tier 1 suppliers to ensure adherence to labour policies and effectiveness. This approach is evident in our vendor engagement program and ongoing due diligence review.

During the FY2025 vendor MSS review cycle, Evora Equity assessed the modern slavery programs of Tier 1 suppliers and identified the following key program attributes:

Program Maturity Distribution:

- Advanced tier programs (7 vendors): Comprehensive multi-jurisdictional programs with extensive auditing, third-party platforms, remediation frameworks, worker empowerment tools, and transparent supply chain mapping
- Developing tier programs (8 vendors): Solid policy frameworks with supplier engagement and risk assessment, but less extensive audit coverage or limited remediation/worker engagement programs
- Foundational tier programs (2 vendors): Basic policy and compliance frameworks meeting legislative requirements but with limited depth in supply chain due diligence, auditing, and remediation

Active Findings Summary:

The FY2025 vendor MSS review identified active labour-related non-compliance findings across multiple vendors, documented and being actively managed. These findings are disclosed transparently and demonstrate that vendor audit programs are functioning as intended — identifying and escalating labour compliance issues for remediation rather than concealing them.

New Balance — 1 active finding (Medium severity): Recruitment fees paid by migrant workers at two Taiwan-based textile suppliers, identified through an NGO investigation. New Balance joined a coalition of 50+ brands (coordinated by AAFA and FLA), developed Corrective Action Plans with the affected suppliers, and engaged directly with the Taiwan Textile Federation in November 2024 to advocate for responsible recruitment practices; remediation ongoing.

Verified Forced Labour or Child Labour Instances:

No vendor confirmed a verified instance of forced labour or child labour during their respective FY2025 reporting periods.

Performance Indicators

We continue to refine our program by which to measure effectiveness in making progress in our efforts to combat modern slavery. Prospective key performance indicators (KPIs) under development include:

- The number of suppliers who have acknowledged our Business Partner Code of Conduct
- The number of supplier audits conducted each year by our tier 1 vendors
- The number of workers trained on our policies and procedures, including those related to modern slavery
- The number of reported incidents of modern slavery by our tier 1 vendors submitting modern slavery act reports
- Vendor MSS coverage as a percentage of total annual spend, tracked year-over-year

We will use these performance indicators to identify areas where we need to improve and to measure our progress over time.

Conclusion and Attestation

We recognize that addressing modern slavery risks in our supply chain is an ongoing journey and that diligence is always required. The FY2025 reporting cycle represents continued progress in vendor coverage, risk assessment methodology, and program maturity benchmarking. The sale of Evora Respiratory LP on July 31, 2025 narrows the scope of future reporting to Kintec Footlabs Inc.

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.



Jeff Block

Managing Director
Evora Equity Inc.

Date: May 31, 2026

I have the authority to bind Evora Equity Inc.