



EYE CARE
PROFESSIONAL

**Forced labour and child labour
in supply chain report
fiscal year 2024**



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1. About this Report

This report is made by ECP Group (the “ECP” or “our” or “we”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and relates to the financial year ending April 30, 2024.

The information provided in this report applies to the ECP.

This inaugural report under the new Act outlines our efforts and initiatives taken to prevent and mitigate the risk of forced labour or child labour (all known as modern slavery) within our operations and supply chains during our last financial year.

2. Preventing and reducing risks of forced labour and child labour

At the ECP, we recognize the importance of upholding human rights and ethical standards in all aspects of our business, and we understand that we are accountable for the social and economic effects of our business actions and decisions. As an organization, we strive to give back through a variety of social, environmental, volunteer, and charitable initiatives that benefit our local and global communities.

We believe that human welfare depends notably on sound economic growth and the maintenance of a healthy environment, which is why we are committed to managing our business to promote these aims. As such, we are dedicated to ensuring that our practices align with Canadian laws and regulations aimed at eradicating modern slavery in all its forms.

During our last financial year, the ECP consistently upheld responsible business practices by implementing internal policies and procedures that adhere to rigorous standards, including in its interactions with employees. Indeed, the ECP continued to provide its workforce with access to a complaint mechanism and protection against retaliation, as well as to diligently employ its established procedures and processes to collect data on workers’ recruitment, while also maintaining internal controls to ensure that all workers are recruited voluntarily through a thorough hiring process, details of which are set out in this Report.

Our commitment to responsible business conduct remained steadfast, particularly in light of the Act coming into effect, and looking forward, we envisage additional initiatives to fight against forced labour and child labour in our supply chains, with a view to implement measures that will be proportional to our lower risk profile.

3. Structure, activities and supply chains

3.1 Structure and Activities



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The ECP is a limited partnership whose registered office and headquarters is located in Montreal. The ECP's network is comprised of clinic facilities, operating and ophthalmic surgeons that are committed to delivering the highest quality of eye care through collaborative clinic practice, education, research, and innovation. The ECP is proud to oversee and manage one of the premiere networks of vision correction providers, subspecialty ophthalmology clinics and public cataract contracts in North America. Our practice offers laser vision correction, refractive lens exchange, private pay refractive cataract surgery, and publicly funded cataract procedures. Through public-private partnerships with local, regional, and provincial health authorities, the ECP is a lead provider of publicly funded cataract surgeries in Canada. The ECP's mission is to improve and preserve eyesight, one patient at a time.

3.2 Supply Chain

The scope and nature of the ECP's business model and activities and jurisdictions of operation, being primarily the provision of services in Canada, generally limits exposure to modern slavery risks in our own business and in our supply chain. From time to time, however, the ECP undertakes limited importation activities, relating to medical equipment. Our non-Canadian suppliers are located in the United States and these suppliers have their own supply chains in the United States. We however recognize that our ability to see deeper into these supply chains, such as the sources of raw materials, is limited.

To mitigate any risks that may result from such lack of visibility, we favour long term relationships with trusted suppliers.

4. Policies, Governance and Due Diligence processes

Through our Code of Ethics, Employee Handbook and enterprise values, the ECP is devoted to maintaining a high standard of protection for the rights of our employees as well as any individual to whom we provide a service.

4.1 Code of Ethics ("Code")

The Code is an integral part of the ECP's vision, as it establishes general principles and rules of professional behavior that must be followed by all the ECP employees. The guidelines in the Code also extend to other people to whom it may apply regarding their daily activities related to the ECP Group. The Code further describes the expected behavior of its employees while conducting business.

The ECP takes a stance on social and environmental responsibilities when it comes to taking business decisions. The ECP believes that human welfare is dependent on economic growth and the maintenance of a healthy environment. Accordingly, decisions must be aligned with these principles. Likewise, the ECP upholds rigorous standards regarding the professionalism of its employees, and



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places particular emphasis on honesty, integrity, and trustworthiness of staff at all times. When making a business decision, an employee should consider a series of factors, including if the decision is legal, fair, ethical, and moral.

The ECP values respect among our employees. The ECP believes working relationships are based on openness and commitment to empower others rather than exploit them. The ECP is committed to maintaining a violence and harassment free environment.

In addition, the Code sets out a reporting policy which prohibits retaliation of any kind against employees who report any breach or suspected breach or material waiver of the Gro's Code of Ethics or any other serious infraction that has occurred either inside or outside of the ECP with respect to our employees, business partners and suppliers. Reported incidents and complaints are investigated efficiently and in a timely manner and, where appropriate, corrective measures are enforced.

We intend to amend our Code to provide that we expect our employees to act in accordance with human rights standards and our zero-tolerance approach to human rights violations across our entire operations and value chain. These principles will govern our internal operations as well as our external activities, through our procurement team's decisions.

4.2 The ECP Employee Handbook

The ECP complies with pay equity laws and regulations for all our employees and is diligent in upholding this obligation.

4.3 The ECP Values

The ECP is built on core values that emphasize its mission and vision. The ECP's fundamental values of respect, collaboration, determination, and inclusiveness enable us to provide the best service and care to patients, while remaining a global leader in the field of refractive and intraocular surgery as well as comprehensive and specialty ophthalmology.

4.4 Recruiting process

The ECP has rigorous recruiting processes in place to ensure that all employees are recruited voluntarily, and we employ them in compliance with all applicable laws.

Our recruitment journey typically begins when a hiring manager submits a request for a new hire. This request outlines the specific requirements and expectations for the role, including essential qualifications and desired skills.

Once the hiring request is received, our recruitment team engages in a collaborative dialogue with the hiring manager to gain a deeper understanding of the role's requirements. Together, they clarify the responsibilities, qualifications, and logistical details required for the position.



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We proceed to open the position within our Applicant Tracking System (ATS). This step aims to attract a diverse pool of qualified candidates who possess the skills and experience required for the role.

As applications are submitted, our recruitment team diligently reviews each candidate, including their identification and age, and proceeds to a selection of the candidacy whose qualifications closely match the job description.

Shortlisted candidates are then invited to participate in a preliminary phone interview. This first interview allows the ECP to assess their qualifications, experiences and motivation ensuring alignment with our organization's values and culture.

Candidates who successfully pass the initial phone interview stage have their profiles shared with the hiring manager for further consideration. The hiring manager carefully reviews each candidate's qualifications and conducts a thorough assessment to determine their fit for the role and our team.

The selected candidates are invited to participate in a detailed interview with the hiring manager. Once a candidate is selected to advance in the hiring process, the hiring manager seeks salary approval to ensure pay equity. Concurrently, necessary background checks are made to verify the candidate's qualifications and suitability for the role.

After successful completion of background checks and salary approval, the hiring manager extends a verbal offer to the candidate. Preparations for the candidate's access credentials and onboarding documents are initiated. Upon signing the employment contract and completion of all pre-employment formalities, the position is officially closed in the ATS and the hiring manager is notified to begin the onboarding process.

4.5. Due Diligence Process

The ECP acknowledges that while the risk of forced labour and child labour in its supply chain is limited given our minor importations, we believe that there is no such thing as a risk-free supply chain. As such, we recognize the importance of ethical business practices and we will continue to select our business partners, including our suppliers, in accordance with the values and principles set out in our Code of Ethics.

5. Assessing, Managing and Remediating Risk

Although our direct suppliers are located in Canada and the United States, where labour standards are strictly enforced, we recognize that the supply chain of such suppliers could sometimes extend to foreign countries where the risk of forced, and child labour may be higher.



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Since the end of our last financial year and in the context of the Act coming into force, the ECP started the process of identifying risks of forced labour and child labour in its supply chains, notably by establishing the list of its suppliers, identify their location and the products they sell, and by compiling any information we may be able to gather on their own sourcing, in order to improve the visibility we have into our extended supply chain.

While we continue this process, we mitigate any potential risks arising from limited visibility by ensuring that the ECP is procuring goods for its operations and prioritizing the cultivation of long-term relationships with reputable suppliers.

Considering we have not identified any forced labour or child labour in our activities and supply chains, we have not implemented any remediation measures. Similarly, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains

6. Training

The ECP employees are regularly apprised of ethical topics for the purpose of educating and raising awareness among our workforce. All new employees receive an onboarding training package which includes our Code of Ethics. Moreover, all new hires are invited to participate in a culture day, where each employee obtains extensive knowledge on the ECP including but not limited to its goals and values.

In 2024 and beyond, the ECP intends to provide training material to all members of its workforce that will include the topics of child and forced labour.

7. Assessing Effectiveness

Following the end of its last financial year, the ECP has commenced elaborating a plan to adopt additional initiatives to minimize the risk of forced labour or child labour within our supply chains. Although we have not yet initiated any actions to evaluate the effectiveness of these endeavors in mitigating associated risks, we intend to assess their effectiveness at a later time..