

# Fighting Against Forced Labour and Child Labour Act: 2024 Report

## INTRODUCTION

This is the first Fighting Against Forced Labour and Child Labour (“FCL”) Statement by Vantive ULC. It sets out the steps that Vantive ULC and the broader Vantive group of companies have taken during FY 2024 to prevent and reduce the risk that FCL is used at any step of the production of goods imported by Vantive ULC into Canada and demonstrates our commitment to addressing FCL and other human rights risks throughout our operations and value chain.

## COMPANY STRUCTURE AND ACTIVITIES

- > Vantive ULC is the only legal entity within the Vantive group that operates in Canada. It does not have any subsidiaries. As such, Vantive ULC is the only Vantive legal entity covered by this report.
- > This is the first report filed by Vantive ULC, reflecting its FCL measures and those of the Vantive group of companies.
- > The business of Vantive ULC was formerly owned by Baxter. Vantive ULC was incorporated on July 5, 2023 (original name, BXT Renal ULC) and started operating the business on February 1, 2025. Vantive ULC’s main business activity is the import, sale and distribution of pharmaceutical products and medical devices, and the provision of supporting technical services.

Vantive is a global manufacturer and supplier of pharmaceutical products and medical devices. The Vantive group, including Vantive ULC, fosters a culture of compliance with all applicable laws, rules and regulations and the highest standards of ethics and business conduct with respect to all human rights issues, including FCL. We do not endorse any form of FCL in our operations or in our supplier network.



## SUPPLY CHAIN

As part of Vantive's 2030 Corporate Responsibility Commitment and Goals, we aim to integrate Vantive's sustainable procurement strategy across 90% of supplier spend, as measured by suppliers' commitment to Vantive's new supplier code of conduct. [Baxter's 2023 Corporate Responsibility Report](#) provides more detail about the activities of the Vantive business when it was the kidney care segment of Baxter.

## DUE DILIGENCE, RISK ASSESSMENT, AND RISK MANAGEMENT

We are integrating our supplier corporate responsibility strategy into our overall supplier management processes and conduct periodic assessments of key suppliers to evaluate cost, delivery, quality, and risk.

We recognize that our supply chain due diligence should be focused on the areas of highest risk. One significant way Vantive advances respect for human rights, with regards to all forms of FCL, is through its supplier sustainability program. For Vantive ULC, this will involve a survey of Vantive ULC's most critical suppliers to evaluate non-financial performance factors and conduct supplier corporate social responsibility risk assessments. The survey will assess whether these suppliers have programs to address potential human rights risks, including human trafficking and slavery (child, forced or bonded labour), and whether the supplier has had any human rights legislation violations: including prosecution, financial or non-financial sanctions during the reporting year.

Vantive is working with EcoVadis, a globally recognized assessment platform that rates businesses' sustainability practices, to conduct a survey of our suppliers' corporate responsibility programs and performance in the areas of environment, labor and human rights, ethics, and sustainable procurement. Through this program, Vantive and participating suppliers can access detailed scorecards with information about strengths, benchmark comparisons and improvement areas. We will also leverage the EcoVadis system to create corrective action plans for suppliers falling below our performance standards and to determine when on-site audits will be necessary.

## POLICIES

[Vantive's Human Rights policy](#) covers our overarching aims around protecting human rights of those impacted by our business. [Vantive's Code of Conduct](#) defines the core principles that govern employee behaviour and business conduct, and provides tools and resources to help employees comply. We have incorporated rules against all forms of FCL into our [Ethics and Compliance Standards for Suppliers](#). Specifically, the Standards seek to prohibit our suppliers from violating laws governing workers' human rights, including human trafficking and slavery. We also require our suppliers to comply with our standards and expectations as well as all laws governing purchasing and may terminate agreements with suppliers that do not. Supplier contracts include language that permits Vantive to audit manufacturing or supplying facilities, for compliance with this standard.



## TRAINING

All Vantive employees are required to comply with [Vantive's Code of Conduct](#). The Code of Conduct defines the core principles that govern employee behaviour and business conduct and provides tools and resources to help employees comply with the same. The company conducts mandatory ongoing training and a Code of Conduct intranet site to keep employees informed and aware of Vantive's ethics and compliance requirements and company expectations.

## REPORTING

[Vantive's Ethics and Compliance Helpline](#) is the primary vehicle for us to hear from employees regarding any alleged contraventions of our integrity standards. The helpline enables any employee to raise concerns, including those relating to respect for human rights, confidentially and without fear of retaliation. External stakeholders, including our suppliers, can also use this Helpline to report human rights concerns.

Vantive enforces a non-retaliatory environment, making it safe for employees and other stakeholders to raise ethics and compliance concerns in good faith. We do not tolerate retaliation against anyone who reports, in good faith, observed or suspected illegal or unethical behaviour or violations.

## REMEDIATION OF FCL

We are not aware of any instances of FCL having been identified or of remediation being needed within our supply chain.

## CONCLUSION

Vantive is committed to continued improvements in our approach to managing supply chain risk. This commitment requires cross-functional collaboration involving many internal commercial and functional business units, including Procurement, Human Resources, Environmental Health & Sustainability, and Legal. Vantive will continue to monitor and review its compliance processes, to ensure transparency and anti-slavery compliance across its businesses and supply chain. This statement was reviewed and approved by the Board of Directors of Vantive ULC.

## ATTESTATION

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for Vantive ULC. 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 financial year ending on December 31, 2024.

A handwritten signature in black ink, appearing to read "Neil Da Silva", is positioned above a horizontal line.

Neil Da Silva (May 12, 2025 09:36 EDT)

I have the authority to bind Vantive ULC.

Name: Neil Da Silva

Title: General Manager and Director, Vantive ULC

Date: 12-May-2025