GFR PHARMA

FULL SERVICE GMP CONTRACT MANUFACTURER

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

Fiscal Year End September 30, 2025

Modern Slavery Statement 2026

GFR Pharma Ltd.

Fighting Against Forced Labour and Child Labour in Supply Chains Report

Introduction

This statement is made by GFR Pharma Ltd. ("GFR", "we", "our" or "us"). It is a statement made in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, Bill S-211[1] (the "Act") and covers the financial year from October 1, 2024 to September 30, 2025. In this report, GFR collectively refers to slavery, servitude, forced and child or compulsory labour and human trafficking as "Forced and Child Labour".

Structure, Activities and Supply Chains

GFR is a privately owned Canadian-based organization headquartered in Coquitlam, British Columbia, operating primarily in the natural health product sector. GFR is a pre-eminent full-service contract manufacturer, packager and formulation expert of tablet, capsule, powder, and liquid natural health products for the Canadian, U.S., and international markets. GFR has one manufacturing facility which includes manufacturing, office and warehousing areas. GFR utilizes third party logistics providers for additional warehousing and transportation needs while operating through a team of over 200 employees in Canada.

The supply chain consists of both domestic and international suppliers. Given the nature of our raw materials, such as herbs, we source raw materials from across the globe while most of our volume is sourced from vendors in Canada, the United States, and select regions in Asia, and Europe. These materials include botanical and herbal extracts, protein powder, vitamins, minerals, flavours, amino acids, sweeteners, enzymes, and other specialty compounds used in nutraceutical formulations. Packaging components such as bottles, caps, pouches, and labels are procured from both domestic and international suppliers.

We collaborate with industry associations such as the Canadian Health Food Association of whom we are a proud member while we focus on quality across our operations though multiple quality system certifications; Certifications include GMP Site License from Health Canada, GMP for NSF ANSI 455-2, SQF for dietary supplement 9 Organic Certification (Canada Organic Regime - COR and National Organic Program - NOP) by Pro-Cert Organic Systems, Registered Dairy Processing Establishment by the Canadian Food Inspection Agency, Safe Foods For Canadian Act Licence by CFIA and Kosher Check Certified Establishment by Kosher Check a recognized member of the Association for Kashrut Organizations (AKO).[2]

[1] Fighting Against Forced Labour and Child Labour in Supply Chains Act Statues of Canada 2023, c. 9 Assented to 2023-05-11

[2] Detailed information available on our website section Quality - GFR Pharma https://gfrpharma.com/quality/

Policies and Due Diligence Processes

GFR's mission and values[3] includes commitment to "Quality and compliance first" as well as "Respect for everyone". Fighting against forced labour and child labour in our supply chain is an important component of achieving our mission and values.

We invest in the training of our employees, as detailed in section Training Provided to Employees, which includes in house training policies such as International Export and Return Shipment, carefully outlining requirements for approved export, including applicable rules and regulations such as the Canadian Food Inspection Agency checklist for food export.

An important policy in our supply chain is Material Supplier Qualification Procedure which outlines our sourcing practices and new vendor verification and onboarding process and requirements.

Forced Labour and Child Labour Risks

GFR conducts risk assessments across its supply chain. Through these assessments, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

As part of our risk assessment and mitigation steps, we only onboard vendors that understand and comply with the Act. This is reflected on the supplier quality agreement which is part of our supplier onboarding process. Those activities significantly reduce and mitigate any risk of forced labour and child labour in our supply chain. We recognize the importance of maintaining our due diligence measures and continuously improving them over time. We will continue to monitor and reflect on our risk profile and refine our due diligence measures accordingly. One of our objectives is to utilize readily available resources such as the Walk Free Global Slavery Index[4] to reflect on the prevalence of modern slavery in GFR's supply chain and potentially the US Department of Labor List of Goods Produced by Child Labor and Forced Labor[5].

Risk Assessment, Mitigation, & Remediation

Our Material Supplier Qualification Procedure includes a risk assessment. A quality agreement, including a requirement to meet the provisions of the Act has been established and utilized for any new vendor onboarding as part of the procedure.

In the 2025 fiscal year, we did not identify any incidents of forced labor or child labor within our activities or supply chain; consequently, we did not find it necessary to implement any measures to

[3] Detailed information available on our website section Our Mission & Values - GFR Pharma https://gfrpharma.com/canadian-nhp-manufacturer/missions-values/
[4] Walk Free Global Slavery Index, https://www.walkfree.org/global-slavery-index/map/#mode=DATA:dimension=p
[5] https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods

remediate such incidents or provide compensation for loss of income to the most vulnerable families derived from Forced and Child Labour activities.

As GFR continues to strengthen its program, we are developing a foundational remediation framework to ensure we can respond appropriately should any instance of forced labour or child labour be identified within our supply chain. At this stage, our approach focuses on establishing clear internal escalation pathways, defining responsibilities for investigation, and outlining potential actions such as supplier engagement, corrective action requests, heightened monitoring, or suspension of business where warranted. As part of our commitment to continuous improvement, we will further refine this framework to incorporate guidance from reputable industry resources and to align with evolving best practices, ensuring that any future remediation efforts prioritize the protection and well-being of affected workers.

Employee Training

All GFR employees are required to complete a vigorous training program. Training varies significantly based on the responsibilities of each role. All new employees are required to go through New Employee Orientation which includes but is not limited to Company Policies, Occupational Health & Safety, including bullying & harassment training, Good Manufacturing Practices, Protective Clothing & Footwear, and Prohibited practices.

More specifically, the Procurement, Manufacturing, Warehouse, and Human Resources teams in addition to the Quality Systems and Regulatory Affairs team must go through role specific training, including vendor onboarding which is captured in the aforementioned Material Supplier Qualification Procedure.

We have identified that this is an area of opportunity. As part of our program enhancement efforts, we plan to provide in-house training for employees that influence and make decisions on vendor selection so they are aware of the importance of the Act and comply through policies and procedures outlined in this report.

Assessment of Effectiveness

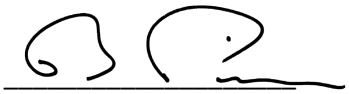
During the reporting period, we could not identify any heightened risk of Forced and Child Labour. We monitor business partner responses to questionnaires and are looking to enhance this procedure beyond new vendor onboarding procedure. We are considering more ways, as part of our continuous improvement efforts, to accurately and thoroughly access our program’s effectiveness.

Attestation

This report has been approved by the Board of Directors of GFR Pharma Ltd. on May 1st, 2026.

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 authority to bind GFR Pharma Ltd.

Signature: 

Date: May 11, 2026

Name: Richard Pierce

Title: Chairman of the Board