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www.myndtec.com

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Forced Labour and Forced Child Labour Policy

MyndTec is committed to and expects respect for human rights and ethical labor practices in its operations and by all its supply chain stakeholders. By the establishment of this Policy, MyndTec participates in the implementation of Canadian Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act. This Policy ensures that our operations are conducted in a manner that respects the dignity, safety, and well-being of all individuals involved in activities at every level of the supply chain.

1. Prohibition of Forced Labor:

MyndTec strictly prohibits the use of forced, bonded, or involuntary labor in any form, including any work or service that requested from an individual under the threat of penalty, coercion, or deceit, physical coercion or threats of violence, retention of identity documents or personal property to restrict freedom of movement, debt bondage, involuntary servitude, or any form of human trafficking for labor exploitation.

2. Protection of Workers' Rights:

MyndTec respects the rights of workers to fair and competitive wages, benefits, and working conditions, in compliance with applicable laws and industry standards. We provide a safe and healthy work environment that is free from harassment, discrimination, and any form of abuse or intimidation. MyndTec Inc. is committed to providing a work environment in which all workers are treated with respect and dignity. Workplace harassment will not be tolerated from any person in the workplace, including customers, clients, supervisors, workers and members of the public.

3. Prevention of Child Labour:

MyndTec prohibits the employment of individuals under the minimum age for employment as defined by the Canadian Employment Standards Code and other applicable local or international laws and regulations or the age for completing compulsory education, whichever is higher.

MyndTec will not engage in or tolerate any form of exploitative child labor, including hazardous work that may jeopardize the health, safety, or well-being of young workers, including its suppliers or partners. MyndTec will ensure a supply chain free from forced child labour by communicating this principle and requirement to its supply chain stakeholders and participating in initiatives aimed at preventing or eliminating child labour.

4. Due Diligence and Monitoring:

MyndTec will assess its supply chain to identify threats and mitigate risks of forced labor and child labor through supplier audits and supplier performance evaluations at defined intervals.


MyndTec Inc. is willing to collaborate with its supplier chain stakeholders to ensure compliance with this anti-forced labor and child labor policy.

5. Accountability and Remediation:

MyndTec will hold all its supply chain stakeholders accountable for the application of this policy and will implement the required disciplinary actions, including termination of business or employment contracts in accordance with applicable laws and provisions for termination of contractual agreements.

MyndTec will address incidents or complaints regarding forced labor and child labor in a prompt and transparent manner.

Myndtec recognizes that fighting and preventing forced labor and child labor involve and collaboration across supply chain stakeholders, the Government and the society at large. We demonstrate our permanent commitment to this cause by fully establishing and enforcing this Policy.

DocuSigned by:

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Craig Leon, MyndTec CEO


May 01, 2024



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Annual Report Forced Labour and Forced Child Labour

Reporting Entity's Legal Name: MyndTec, Inc.

New Report ☒ **Revised Report** ☐

Financial Reporting Year: 2024

Business Number(s) 203019245 (DUNS)

Identification of Reporting Obligations in Other Jurisdictions: Not applicable

Entity Categorization according to the Act: Corporation

Sector/Industry: Medical Technology

Location: Mississauga, Ontario, Canada

Introduction

MyndTec, Inc. is a pioneering medical technology company dedicated to the development and commercialization of innovative therapies for neurological rehabilitation. This report outlines our efforts and initiatives to prevent and reduce risks of forced labour and child labour in our activities and supply chains during the previous financial reporting year.

There are no changes since the report for fiscal year 2023.

Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour (Subsection 11(1))

MyndTec, Inc. continues to take measures to prevent and reduce the risk of forced labour and child labour in our operations and supply chains. These measures include:

Development and implementation of policies related to forced labour and child labour.

Engagement with suppliers and partners to assess and manage risks in our supply chains.

Training employees and board members to raise awareness and understanding of forced labour and child labour issues.

Ongoing evaluation of the effectiveness of our efforts to ensure compliance with relevant regulations and standards.

Suppliers have been notified on these policies.



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Supplementary Information (Subsection 11(3))

(a) Structure, Activities, and Supply Chains

MyndTec, Inc. operates in the medical technology sector, focusing on neurological rehabilitation solutions. Our activities include research, development, and commercialization of medical devices. We maintain supply chains involving suppliers of raw materials, components, contract manufacturing and services essential to our product manufacturing process.

(b) Policies and Due Diligence Processes

We are implementing policies to address forced labour and child labour risks.

(c) Forced Labour and Child Labour Risks

MyndTec, Inc. is progressively working on identifying potential risks of forced labour and child labour in our supply chains. These risks will be regularly assessed and managed through various mechanisms, including supply chain controls through our purchasing procedures and risk assessments.

(d) Remediation Measures

In the event of identifying forced labour or child labour risks, MyndTec, Inc. will take prompt remediation measures, in alignment with Bill S-211, international standards and best practices.

(e) Remediation of Loss of Income

As we become more experienced in and aware of Bill S-211, we will progressively strengthen our efforts to prevent or eliminate forced labour and child labour risks by implementing measures to mitigate any adverse impacts on vulnerable families, ensuring the sustainability of our supply chains.

(f) Training

We have provided training to our employees and board members on forced labour and child labour issues, following Bill S-211 guidelines. We plan to periodically review the training on Bill S-211 to ensure it remains relevant and effective.

(g) Assessing Effectiveness

MyndTec, Inc. plans to regularly evaluate the effectiveness of our efforts to prevent and reduce risks of forced labour and child labour. This includes monitoring our suppliers.

Compliance and Enforcement

MyndTec, Inc. acknowledges its legal responsibility to comply with reporting requirements outlined in Act S-211. We ensure the accuracy and integrity of the information provided in this report and stand ready for verification if required.



This report reflects MyndTec, Inc.'s commitment to transparency, ethical business practices, and the protection of human rights across our operations and supply chains. We remain dedicated to continuous improvement and collaboration with stakeholders to address challenges and uphold our values.

MyndTec continues to implement Bill S-211 by:

Stage	Status
1. Training and creating awareness of all stakeholders.	Done
2. Enforcing.	Ongoing
3. Monitoring and assessing effectiveness.	End of fiscal year
4. Continually improvement, prevention, remediation, and training based on lessons learned.	Ongoing.

Signatory

Name / Position: Craig Leon / CEO

Signature:

Date: July 31, 2025



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Appendix A: Risk Assessment for Bill S-211 Compliance

Risk	Status
Understanding of Legislation:	
Risk: Lack of understanding of the requirements outlined in Bill S-211 may result in inadvertent non-compliance. Mitigation: Regularly review and analyze the provisions of Bill S-211 to ensure a thorough understanding of the legal requirements. Provide training sessions for relevant staff members to educate them about the implications of the bill and their responsibilities under it.	Training provided to staff, board, and stakeholders.
Operational Implications:	
Risk: Failure to align operational practices with the requirements of Bill S-211 may lead to violations and legal repercussions. Mitigation: Conduct a comprehensive review of existing operational policies and procedures to ensure compliance with Bill S-211. Implement necessary changes to internal processes, particularly in areas such as hiring practices, workplace accommodations, and discrimination prevention.	Supplier controls. Ensure hiring is performed following the Canadian Labour laws; ensure diversity.
Supplier Compliance:	
Risk: Suppliers or business partners may not adhere to the standards mandated by Bill S-211, leading to potential risks within the supply chain. Mitigation: Establish robust supplier evaluation and monitoring mechanisms to assess compliance with Bill S-211 requirements. Include clauses related to human rights and non-discrimination in supplier contracts and agreements. Conduct regular audits and assessments of supplier practices to ensure alignment with legislative requirements.	Supplier controls. Ensure suppliers meet the requirements of Bill S-211.
Risk of Discrimination:	
Risk: Failure to address discriminatory practices within the organization may result in legal liabilities and reputational damage. Mitigation: Implement anti-discrimination policies and procedures that align with the provisions of Bill S-211. Provide training to employees on diversity, equity, and inclusion, emphasizing the importance of respecting human rights and preventing discrimination in the workplace. Establish channels for reporting and addressing instances of discrimination promptly and effectively.	In progress.
Data Privacy and Security:	
Risk: Inadequate protection of employee and customer data may result in privacy breaches and legal penalties. Mitigation: Ensure compliance with relevant data protection laws, including those pertaining to employee and customer information. Implement robust data privacy and security measures, such as encryption, access controls, and regular security assessments. Provide training to employees on data handling best practices and the importance of safeguarding sensitive information.	Per section 8.2 of our Document and Record Controls SOP 423, Confidentiality of Protected Health Information (PHI) All records are confidential, and their access limited to authorized personnel. Certain records may contain confidential or protected health information (for example, within adverse event reports, complaints and patient's first



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Risk	Status
Data Privacy and Security (Cont.)	<p>name, date of birth, date of injury, etc.). Confidential information is protected by restricting access to that information to Customer Service, QA, Engineering and Management staff. Employees will take appropriate steps to ensure health information is de-identified.</p> <p>Quality records shall be readily available for inspection and audit with the exception of reports generated for Management Review, Quality Audits and Supplier Audits, in accordance with 21 CFR 820.180(c).</p> <p>Fraud and Falsification of Records Falsification of records will result in disciplinary action which may include termination, per section 8.3 of SOP 423. Staff is trained on SOP 423.</p>
Reputational Risks:	
<p>Risk: Non-compliance with Bill S-211 and associated human rights violations may damage the company's reputation and brand image.</p> <p>Mitigation: Proactively communicate the company's commitment to human rights, diversity, and non-discrimination through public statements, corporate social responsibility initiatives, and transparent reporting. Engage with stakeholders, including customers, investors, and advocacy groups, to demonstrate a genuine commitment to ethical business practices and social responsibility.</p>	<p>Implementation of actions to fight Forced Labour and Forced Child Labour, including a Forced Labour and Forced Child Labour policy, supplier controls and training.</p>
Legal and Regulatory Compliance:	
<p>Risk: Failure to comply with the provisions of Bill S-211 may result in legal penalties, fines, and regulatory actions.</p> <p>Mitigation: Regularly monitor changes to relevant laws and regulations, including updates to Bill S-211 and associated guidance. Consult legal experts or advisors to ensure ongoing compliance with legislative requirements. Maintain accurate records and documentation to demonstrate adherence to Bill S-211 and other applicable laws.</p>	<p>Incorporate monitoring of laws and regulations to the external document review.</p>

By addressing these risks and implementing appropriate mitigation strategies, Myndtec Inc. can enhance its compliance with Bill S-211 and uphold its commitment to human rights, diversity, and non-discrimination. Regular monitoring and review of risk factors will be essential to ensure ongoing compliance and mitigate emerging risks effectively.