



**2024 Report Required Under *Fighting Against Forced Labor and  
Child Labor in Supply Chains Act*  
Submission to the Government of Canada  
May 31, 2024**

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**Identifying Information**

This report is submitted by Scribe Opco, Inc., a corporation authorized to do business in Canada, for financial reporting year January 1 through December 31, 2023. This is the original report, and a revised version of this report has not been submitted for this reporting year.

Scribe Opco, Inc.'s business number is 70865 6095.

This is a joint report that covers Scribe Opco's trade names Koozie Group, Imagen Brands, and includes Scribe Canada, Inc. **The report focuses on the social responsibility commitment and related activities undertaken by Scribe Opco under the trade name Koozie Group.**

Scribe Opco, Inc. is not subject to reporting requirements under supply chain legislation in any other jurisdiction.

Scribe Opco does business in Canada and meets all the size-related thresholds below:

- Has at least \$20 million in assets for at least one of its two most recent financial years
- Has generated at least \$40 million in revenue for at least one of its two most recent financial years
- Employs an average of at least 250 employees for at least one of its two most recent financial years

Scribe Opco operates in the manufacturing industry, manufacturing in and sourcing promotional products from the United States and other countries for import and sale into Canada.

Scribe Opco is headquartered at 14421 Myerlake Circle, Clearwater, FL 33760.

**Approval and attestation**

In accordance with the requirements of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (the "Act"), and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for Scribe Opco, Inc. 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.



The undersigned has the authority to bind Scribe Opco, Inc.

Full name: Pierre Montaubin

Title: CEO

Date: 29-May-2024

Signature: *Pierre Montaubin*

**Annual Report**

1. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)

Koozie Group took the following steps in the previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada:

- Mapping supply chains.
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.
- Developing and implementing due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labor and/or child labor in the organization's activities and supply chains.
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labor and/or child labor in their activities and supply chains.
- Monitoring supply chain partners through audits, visits, and assessments to ensure they meet labor standards.

2. Please provide additional information describing the steps taken (if applicable) (1,500-character limit).

Koozie Group strives to do business in a way that benefits its people, its customers, its industry, and its communities. Koozie Group wants to leave a positive, lasting impact with the solutions and experiences it delivers. To live out this vision, Koozie Group recognizes four key focus areas:

- a. Safety and Social Responsibility
- b. Environmental Stewardship
- c. Fostering Diversity and Inclusion



d. Giving Back to Employees and Community

Throughout 2023, Koozie Group was a Participating Company member of the Fair Labor Association and took several steps to further develop and enhance its social compliance program.

To assist in ongoing supply chain mapping efforts and to better manage its active suppliers and factories, Koozie Group made progress during the reporting year to centralize supplier, factory, audit, and remediation data for each supplier and factory in its global supply chain. The goal of this initiative is to ensure that supplier and factory information is updated as close to real time as possible, and that this information is accessible to all relevant Koozie Group team members. This work will continue in 2024.

Koozie Group rolled out its revised Supply Agreement, which covers all contract suppliers and facilities globally. Central to the enhanced agreement is Koozie's updated Code of Conduct (completed in January 2023), which is fully aligned with international labor standards and includes strong forced labor and child labor provisions, supported by detailed compliance benchmarks. Suppliers and facilities are expected to abide by the [Code of Conduct and Compliance Benchmarks](#), which Koozie monitors through its social compliance audits and follow-up on remediation.

3. Which of the following accurately describes the entity's structure? (Required)

Corporation.

4. Which of the following accurately describes the entity's activities? Select all that apply. (Required)

- Producing goods (including manufacturing, extracting, growing, and processing)
  - outside Canada
- Selling goods
  - in Canada
  - outside Canada
- Distributing goods
  - in Canada
  - outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

5. Additional information on the entity's structure, activities and supply chains (1,500-character limit).



Koozie Group is a U.S.-based corporation that designs, manufactures, sources, and supplies a wide array of promotional products, i.e., consumer goods that are embellished with customer logos and given away to end users. Koozie sources, manufactures, and embellishes products in 14 countries around the globe and supplies products to promotional products distributors.

Koozie's supply chain, which is shared by all Scribe Opco group entities, comprises owned facilities in the United States and contract suppliers and traders in other manufacturing countries that, in turn, contract with factories. The Koozie social responsibility program covers owned facilities and contract suppliers and factories across its entire supply chain.

More information about Koozie's social impact and sustainability commitment is described in its [2022 "Keep It. Give It." report](#).

6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

Yes.

- 6.1 If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500-character limit).

As noted above, Koozie Group's code of conduct was updated in 2021 to strengthen all code elements and integrate compliance benchmarks. During 2023, several steps were taken to integrate the enhanced code and benchmarks into Koozie's monitoring processes, namely:

- As noted, the Supply Agreement executed with each supplier was updated with the new code and benchmarks. Additionally, provisions were added to the agreement to require suppliers and facilities to focus on remediation and an approach of



continuous improvement. The new agreement was rolled out to all suppliers in 2023.

- Koozie’s benchmarks were updated to include specific regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.
- The audit questionnaire used for internal Koozie Group audits of supplier facilities was aligned with the updated code, including enhancements to the forced labor and child labor sections of the audit questionnaire. Additional improvements were made to the tool to strengthen collection of worker input during the auditing process. New zero-tolerance items were identified and adopted throughout the audit tool. Identification of zero-tolerance issues during audits will now result in implementation of an immediate escalation process and a requirement for rapid remediation by the factory and supplier.
- Koozie’s standard operating procedure for auditing was strengthened and a new standard operating procedure on remediation was drafted and adopted.
- The Corrective Action Plan (CAP) template was strengthened to prioritize root cause analysis by factories and suppliers for all non-compliances identified during audits.
- Following pilots of the new due diligence tools and standard operating procedures in 2024, the enhancements will be integrated into the Koozie social responsibility program in 2024 and beyond.

All the foundational improvements executed during 2023 will lead to strengthening of Koozie’s due diligence of processes related to forced labor and child labor.

8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

8.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

- The locations of its activities, operations or factories
- The raw materials or commodities used in its supply chains
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of forced labour



9. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required).

Manufacturing.

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500-character limit).

Forced labor and child labor are embedded risks in the manufacturing supply chain and in many manufacturing countries around the world. Koozie Group has taken the following steps to assess and manage those risks:

- Koozie requires suppliers and factories to contractually agree to implementing Koozie Group's code of conduct, which includes strong child labor and forced labor provisions.
- Koozie's internal audit tool and the external audit reports it accepts for its supplier factories are based on internationally recognized forced labor and child labor code elements and evaluate adherence to those provisions.
- When non-compliances with these code elements are identified, Koozie Group requires corrective action to be implemented by the factory in partnership with the supplier. Koozie then follows up on the remediation plans to ensure implementation.
- Koozie Group has implemented chain of custody analyses for suppliers in India, Pakistan, and Bangladesh to evaluate deeper-tier suppliers in its upstream supply chain and is working to ensure that none of the raw materials are sourced in regions that have incidence or a history of forced labor. Koozie will continue to strengthen mapping and implementation in its upstream supply chain in 2024 and beyond.

11. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500-character word limit).

Not applicable.



13. Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)

Not applicable, 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.

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500-character word limit).

Not applicable.

15. Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

No.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable) (1,500-character word limit).

Training on Koozie Group's social responsibility commitment, code of conduct, and compliance benchmarks was developed in 2023. This training will be delivered to employees in the coming year.

17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)

Yes.

17.1 \*If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators.



18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500-character limit).

For its owned facilities, Koozie Group tracks all cases reported through its grievance channels. No instances of forced labor or child labor have been reported to date. As noted above, additional training for all employees on Koozie's code of conduct, including the forced labor and child labor provisions, is planned.

Though its Corrective Action Plan (CAP) process, Koozie works with suppliers and facilities to ensure that all non-compliances are remediated. Although no instances have yet been uncovered related to forced labor or child labor, for any future instances, Koozie would follow up on remedial actions through the CAP.