

# 2025 Report

## Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”)

This report is made on behalf of the following entities:

Nordik Spa Village Chelsea Inc. (876879115RC0001)  
Thermea Spa Village Winnipeg Inc. (837645118RC0001)  
Thermea Spa Village Whitby Inc. (713918472RC0001)  
Nordik Immobiliers – Whitby Inc. (710616285RC0001)  
Nordik Immobiliers – Chelsea Inc. (818090854RC0001)  
Gestion Spa Villages Inc. (776020299RC0001)

(“the Entities”)

This report is the third report submitted under the Act. It summarizes our efforts to identify and assess risks within our operations and supply chains.

## Overview of the Entities

The financial year of the Entities, for the purposes of this report, ended on September 30, 2025.

All Entities are corporations incorporated under the Canada Business Corporations Act. None of the Entities is required to report in any other jurisdiction.

The Entities own, manage, and operate three spa and wellness facilities located respectively in Chelsea (Québec), Winnipeg (Manitoba), and Whitby (Ontario). The corporate team, based in Gatineau (Québec), oversees all operations. The Entities employ approximately 800 employees across the four sites.

## Policies and Procedures

In the course of their activities, the Entities have adopted rigorous policies and procedures regarding human resources management. These policies and procedures include measures to promote a healthy and harassment-free work environment.

Purchases of goods and services are made in connection with spa operations, as well as the construction and maintenance of facilities. Goods and services include, without limitation:

- Goods and services required for the maintenance and hygiene of pools, saunas, and other facilities in our spas (chemicals, maintenance products);
- Goods and services required to ensure our clients’ comfort (robes, towels, essential oils);

- Goods and services required for the operation of our restaurants and lounges (food and beverages);
- Goods and services required for the maintenance of our facilities, equipment, buildings, and grounds (construction materials, tools, filtration equipment, plumbing);
- Goods and services required for the management of our Entities (servers, computers, electronic systems, software).

The Entities maintain a diversified supply chain, composed primarily of Canadian and American companies, and also source from suppliers in Mexico and the European Union.

In accordance with Public Safety Canada's expectations, the following is the geographic origin of the main goods and services used within our supply chain:

- Chemical and maintenance products: Canada;
- Robes: Mexico;
- Essential oils: Canada, European Union;
- Food and beverages: Canada;
- Construction materials and equipment: Canada, United States;
- IT equipment and software: Canada, European Union, United States.

## **Risk Assessment and Due Diligence**

To date, the Entities do not have a written policy or process to determine whether any part of their supply chain involves forced labour or child labour. However, they apply strict hiring policies, in compliance with Canadian law, and take into consideration the location of suppliers when they are not based in Canada or the United States.

As of the date hereof, no allegation of forced labour or child labour has been brought to our attention in relation to the activities of our suppliers.

## **Corrective Measures and Remedies**

Since no instance of forced labour or child labour has been identified within our operations or supply chains, the Entities have not had to take any corrective measures in this regard.

## **Assessment of Effectiveness**

The Entities assess the effectiveness of their efforts through the following means: on-site visits to at-risk suppliers, tracking the geographic origin of purchased goods, and verifying the absence of forced labour or child labour allegations.

## **Attestation**

In accordance with the Act, I attest that I have reviewed the information contained in this report for all the Entities. To the best of my knowledge, I attest that the information contained in this report is accurate for the financial year ended September 30, 2025.

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**Martin Paquette, President**