



## MODERN SLAVERY DISCLOSURE STATEMENT (CANADA)

### **Introduction**

At Cimpress, we recognize the critical role we play in ensuring that our suppliers share our commitment to the protection of human rights, including the elimination of human trafficking and modern slavery. We are focused on ensuring not only that we are sourcing our raw materials responsibly but also that we are protecting the human rights of the people who help us make our products.

Cimpress has a large product catalogue with products from a variety of industries and a supply chain that spans the globe. We have a global procurement organization, as well as local procurement teams in our various businesses.

This report is made by Vistaprint B.V. and its subsidiaries Cimpress Windsor Corporation, Build A Sign LLC and National Pen Co. LLC (together, the "Cimpress Reporting Entities") for the financial year ended June 30, 2023, in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. Our report outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain.

### **Structure, Activities and Supply Chains**

Cimpress is a strategically focused group of businesses that specialize in mass customization of printing and related products, via which we deliver large volumes of individually small-sized customized orders. Cimpress is comprised of dozens of legal entities, including the Cimpress Reporting Entities, employing over 15,000 people worldwide. The ultimate parent company of the Cimpress group of entities is Cimpress plc (NASDAQ: CMPR).

Our products and services include a broad range of marketing materials, business cards, signage, promotional products, logo apparel, packaging, books and magazines, wall décor, photo merchandise, invitations and announcements, design and digital marketing services, and other categories. Mass customization is a core element of the business model of each Cimpress business and is a competitive strategy which seeks to produce goods and services to meet individual customer needs with near mass production efficiency.

We source products such as the equipment and raw materials used in our production operation, apparel, writing instruments, and other promotional products. We contract with multiple suppliers, fulfillers, merchants, and other business partners in many jurisdictions worldwide.

More information about Cimpress is available on our website at [www.cimpress.com](http://www.cimpress.com) and in documents that we periodically file with the United States Securities and Exchange Commission.

### **Risks and Steps Taken to Assess and Manage Risks**

Within the Cimpress Reporting Entities' operations, we believe the risk of modern slavery is low. The Cimpress Reporting Entities employ team members in the United States, Canada and the Netherlands,

and we have fair and responsible employment practices in place to protect and promote our employees' rights.

That said, we recognise that risks of modern slavery may be present in our supply chain due to the procurement of products through direct and indirect suppliers. As such, Cimpress has an interconnected series of processes intended to ensure that our operations and supply chain are free from human trafficking and modern slavery. These processes (described in detail in the following sections) include:

- a) Our Code of Business Conduct & Annual Training;
- b) Our Supplier Code of Conduct;
- c) Raw Material Certification;
- d) Supplier Auditing & Development;
- e) Monitoring risks at various levels of our supply chain, from raw materials to finished goods; and
- f) Confidential Reporting Helpline.

At present, we have not identified or been made aware of any issues related to human trafficking or modern slavery (including forced labour and child labour) in our supply chain; however, should we become aware of any such issues, we will take action which could range from working with the supplier to resolve the issue and conducting follow-up site audits to ensure that the deficiency has been corrected, to terminating the supplier relationship entirely.

We have not identified or been made aware of any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour either; however, should we become aware of such losses, we will take appropriate action.

### **Code of Business Conduct & Annual Training**

Our commitment to human rights is outlined in our Code of Business Conduct, which is available in 6 languages. Each year, every Cimpress employee is required to participate in our annual compliance and security training, which includes an acknowledgement that they have read, understood and agree to comply with our Code of Business Conduct. Our Code of Business Conduct is the foundation of our compliance program and outlines:

- Our refusal to use any form of forced, involuntary or child labor in any of our facilities or permit its use in any part of our supply chain;
- Our commitment to a harassment-free work environment;
- The importance of treating others with fairness and respect;
- Our commitment to workplace safety;
- The importance of honesty, fair dealing and ethical conduct;
- Our efforts to combat corruption and bribery; and
- Our strict anti-retaliation policy which is intended to ensure that employees do not suffer negative consequences for reporting an ethics concern in good faith.

We report to our CEO and Board of Directors on the status of our compliance and training program. We think this level of attention by our CEO and Board helps set the right tone from the top and underlines our commitment to doing business ethically and with integrity.

### **Supplier Code of Conduct**

In addition to our Code of Business Conduct, we also have a Supplier Code of Conduct. We ask our first-tier suppliers to sign and comply with our Supplier Code of Conduct. In addition, we ask our first-tier suppliers to sign our Master Procurement Agreement, which requires those suppliers to abide by all

laws and regulations (including Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9), and gives us the right to conduct in-person audits to ensure they are in compliance with our contract and Supplier Code of Conduct. Our Supplier Code of Conduct outlines our expectations that our suppliers:

- Do not use forced, compulsory or child labor in any of their own or their business partners' facilities;
- Do not permit any form of harassment or discrimination in their workplaces;
- Do not tolerate inhumane treatment, threats of violence, corporal punishment or other forms of physical coercion in their workplaces;
- Share our commitment to honesty, fair dealing and ethical conduct;
- Do not tolerate unsafe conditions or conditions that endanger their employees;
- Are committed to anti-corruption and anti-bribery policies and practices;
- Pay their workers at least the minimum wage required by applicable laws and provide all legally mandated benefits; and
- Pay their workers in a timely manner and comply with applicable laws and regulations regarding working hours for their employees.

To ensure that our supply chain partners are living up to our standards of business integrity, our Internal Audit team performs periodic checks on (1) whether our suppliers have signed our Supplier Code of Conduct and (2) any other measures Cimpress has taken to ensure that our supply chain does not allow for unacceptable practices such as child labor, slavery and unsafe working conditions.

### **Raw Material Certification**

In 2016, we began converting a substantial portion of the paper used in Cimpress-owned facilities to FSC-certified product. FSC, or Forest Stewardship Council, is an international non-profit organization committed to promoting responsible management of the world's forests. Certification to FSC standards confirms that the wood used in a paper product was sourced in an environmentally sound, socially beneficial and economically prosperous way. More specifically, certification to FSC standards provides external assurance that the forest and value chain through which our paper is produced maintains or enhances forest workers' social and economic well-being and protects traditional and civil rights. In FY23, 83% of the paper used for printing customer orders in our Cimpress facilities was sourced from FSC-certified products. In light of strict incoming regulation in Europe, we have expanded our list of accepted certifications to include PEFC-certified products as well. We are now actively working towards reaching 100% of either of these two standards in the coming years. We also recently extended the reach of our FSC commitments to ensure that these same values are protected in both our packaging and 3<sup>rd</sup> party fulfillment supply chain. We believe our transition to FSC-certified paper is a significant step towards assurance that human trafficking and modern slavery are not occurring in our supply chain.

### **Supplier Auditing & Development**

Since 2016 we have conducted independent third party, in-person social audits of select first-tier suppliers, starting with suppliers in geographies and industries indicating a high risk for human rights violations. These social audits include a number of topics, including child labor, forced labor, safety conditions, fair labor standards and fair wages.

### **Monitoring Our Supply Chains**

We developed strategic partnerships with our suppliers and have contractual commitments in place that require them to inform us of any issues they are facing in their business.

### **Confidential Reporting Helpline**

Finally, Cimpres maintains a confidential ethics reporting helpline ([Speakup.Cimpres.com](https://Speakup.Cimpres.com)) that is available to our employees, customers, suppliers and members of the public to report any concern about ethical supply chain matters. We publish our helpline website and phone number in our Code of Business Conduct, which is available on our company website. We thoroughly investigate every report submitted through that helpline and report the results of those investigations to our CEO and the Audit Committee of our Board of Directors.

### **Assessing Effectiveness**

We are committed to the elimination of human trafficking and modern slavery in our supply chain. We have taken a number of significant actions designed to address the risk of human rights violations in our operations and our supply chain, but we still have work to do. We intend to continue these efforts in coming years, including through increased supplier due diligence that includes human rights assessments. As we take further measures to prevent and mitigate modern slavery risks in our business and supply chains, we plan to keep track of our actions and review our performance in modern slavery compliance so that we can continue to improve.

Approved by the Vistaprint B.V. Board of Directors pursuant to Paragraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 31, 2024.



Signed by: Sean Quinn  
Managing Director