



ANNUAL REPORT Bill S-211

This report is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* S.C. 2023, c. 9 (the “**Act**”). The report outlines the approach and initiatives taken by RhythmLink International, LLC (“**RhythmLink**”) to identify and address the risks of forced labour and child labour in its business operations and supply chains in its 2023 financial reporting year.

OUR COMMITMENT

RhythmLink is committed to preventing and reducing the risk that forced labour or child labour is used in the production of the goods it produces, sells, and imports to its customers.

ORGANIZATIONAL STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

Headquartered in Columbia, South Carolina, RhythmLink is a limited liability corporation engaged in the manufacturing, wholesale trade, and retail trade of diagnostic equipment and other medical devices. The company also provides custom packaging, private labeling, and custom products. Pursuant to these activities, RhythmLink imports goods into Canada that are produced in other countries.

RhythmLink sources the highest quality materials and components from North America, Europe, and Asia. The vast majority of component production occurs in the United States, while assembly is performed at the company’s wholly owned manufacturing facilities in Asia. Applicable products are sterilized at RhythmLink’s North American contract sterilizers, and the company distributes its products from its headquarters in South Carolina to customers worldwide.

STEPS TAKEN BY RHYTHMLINK IN THE PRIOR FINANCIAL YEAR

In addition to the below policies and due diligence processes that were in force throughout the 2023 reporting year, RhythmLink has taken other steps to help minimize the risk of forced and child labour in its supply chains. Specifically, the company complied with its reporting obligations under the United States’ *Dodd-Frank Act*. The company affirmed in its report that, to the best of its knowledge, and that of its suppliers, the minerals used in its supply chain did not come from mines who use forced or child labour.

RhythmLink also added relevant contractual clauses to the terms and conditions of its Purchase Order Agreement. These clauses require the supplier to represent and warrant that those goods and/or services provided by the supplier were produced in compliance with all applicable labour laws. Finally, RhythmLink participated in the annual EcoVadis review of the company’s operations.

POLICIES AND DUE DILIGENCE PROCESSES

RhythmLink has due diligence processes in relation to forced and/or child labour, including embedding responsible business conduct into the company’s policies and management systems.

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In 2023, RhythmLink maintained the following policies and processes to help identify and manage potential forced labour and child labour risks within the business and its supply chain:

1. The terms and conditions of the Purchase Order agreements used by RhythmLink and the company's facilities in Asia require the supplier to represent and warrant that goods and/or services provided by the supplier were produced in compliance with all applicable labour laws.
2. A Purchasing Procedure that requires RhythmLink's Purchasing Department personnel to exercise sound business judgment and to maintain the highest ethical and moral standards based on standard business practices. This includes but is not limited to verifying that the supplier is an Approved Supplier and has agreed to the terms and conditions of RhythmLink's Purchase Order Agreement.
3. An Employee Handbook that requires RhythmLink's employees to maintain the highest ethical standards in the conduct of company affairs and comply with all applicable laws. In addition, the RhythmLink Employee Safety Team Charter requires management and employees to report unsafe work conditions and practices.
4. All RhythmLink employees are verified to be at least 18 years of age prior to beginning their employment with the company.
5. RhythmLink maintains an anonymous employee concern reporting process that is accessible for all employees, who are encouraged to report any legal, ethical, or moral concerns.
6. An EcoVadis review of the company's operations based on four key categories, including labor and human rights standards, ethics, and procurement practices.

In subsequent reporting years, RhythmLink intends to implement other policies and due diligence processes to prevent and reduce the risk that forced labour or child labour is used at any step of the production of the goods that the company produces, sells, distributes, and/or imports in or outside of Canada.

FORCED LABOUR AND CHILD LABOUR RISKS

RhythmLink is aware that there may be higher risks associated with certain regions, goods, and industries. As such, the company has continued its commitment to risk reduction by compliance with the Conflict Minerals portion of the *Dodd-Frank Act*.

Additionally, RhythmLink has produced a geographical heat map to show the origins of the components and base components used in its products. The heat map will be used in future reporting to evaluate the risk of forced labour or child labour based on region.

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REMEDIATION MEASURES

RhythmLink has not identified any forced labour or child labour in its activities or supply chains. As such, the company has not undertaken any remediation measures.

REMEDIATION OF LOSS OF INCOME

RhythmLink has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, the company has not undertaken any income remediation measures.

TRAINING PROVIDED TO EMPLOYEES

RhythmLink provides mandatory training to its employees on the company's Employee Handbook and the RhythmLink Employee Safety Team Charter. However, the company does not provide training to employees that is specific to forced labour or child labour.

In subsequent reporting years, RhythmLink intends to conduct training on forced labour and child labour for the applicable employees in its workforce.

ASSESSING EFFECTIVENESS

RhythmLink does not currently have specific policies and procedures in place to assess its effectiveness in reducing or eliminating the risk of child labour and/or forced labour in its supply chain.

In subsequent reporting years, RhythmLink intends to explore methods it can use to assess its effectiveness in ensuring that forced labour and child labour are not being used in its supply chains and activities.

APPROVAL AND ATTESTATION

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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of RhythmLink International, LLC have executed this report as of the effective date of the signatures set out below.

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SIGNED

) RHYTHMLINK INTERNATIONAL, LLC
)

) *Joseph Straczek*
)

Date

) **Name:** Joseph Straczek
) **Title:** Chief Operating Officer / Chief Financial
) Officer
)

I have authority to bind RhythmLink International,
LLC