
Dyson Modern Slavery and Child Labour Statement 2024

Canada

1.0 Dyson’s business, operations and supply chain

Dyson Canada Limited (“Dyson”), which, alongside other non-reporting entities has the ultimate parent company Dyson Holdings Pte Limited (together the “Dyson Group”). The Dyson Group is a global group of companies committed to conducting business in an ethical and environmentally responsible way. This statement is made on behalf of Dyson Canda Limited:

Dyson Subsidiary	Country of Incorporation and Registration Number	Registered Address	Applicable Act
Dyson Canada Limited	Canada 6397751	8 Spadina Ave Suite 2200 Toronto ON M5V 0S8 Canada	The Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (Bill S-211)

The Dyson Group has engineering, research, development, manufacturing and testing operations in Singapore, the UK, Malaysia, Mexico, China, and the Philippines. The Dyson Group is headquartered in Singapore and employs over 10,000 people globally.

The Dyson Group’s own manufacturing operations are based in Singapore, Malaysia, and the Philippines. The Dyson Group’s supply chain includes contract manufacturers in Malaysia, the Philippines, Mexico, and China, with tier two and three manufacturing suppliers primarily based in Asia. It also includes suppliers of other goods and services to support its operations, such as cleaning, maintenance, catering and security providers.

Message from The Dyson Group’s Chief Supply Chain and Operations Officer

“Dyson firmly rejects modern slavery and child labour in all forms, and we are dedicated to upholding the highest standards of conduct throughout our operations and global supply chain.”

Michael Rombouts, Global Supply Chain and Operations Officer

2.0 Introduction

Dyson is committed to ensuring that it conducts its business in a legal, compliant and ethical manner. Dyson is committed to providing work that is freely chosen and to supporting livelihoods within the Dyson Group’s manufacturing operations and its wider supply chain.

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is an umbrella term that includes human trafficking, slavery, servitude and forced labour. Child labour includes the worst forms of child labour as defined in article 3 of International Labour Organisation (ILO) Convention 182 and/or labour which interferes with access to or quality of mandatory education.

Dyson does not tolerate modern slavery or child labour. Dyson recognises that identifying and mitigating the risks of modern slavery and child labour in global companies with complex supply chains requires on-going commitment. Dyson therefore remains dedicated to tackling these issues through strong policies, internal and external audits, training, and input from independent external experts, in collaboration with the wider Dyson Group.

3.0 Our approach

The following sections describe the Dyson Group's due diligence approach.

3.1 Governance

The Dyson Group's specialist Corporate Social and Environmental Responsibility ("CSER") team works in partnership with supply chain facing teams to set and monitor adherence to modern slavery and child labour prevention requirements in the supply chain. The Dyson Group works with its suppliers to help them to understand, adapt their operations, and thus meet expected standards through a combination of training, audits, and assessments.

The Dyson Group's Sustainable Supply Chain Programme is overseen by the Sustainable Supply Chain Council which reviews adherence to the Dyson Group's policies, critical remediation and consequential actions for suppliers who do not meet expected standards. The Dyson Group's supply chain governance model allows for immediate action to be taken if it is discovered that standards are not being met. The Dyson Group's preference is to continue to work with a supplier to achieve long-term continuous improvement, however, where this becomes unrealistic, the Dyson Group is prepared to end its engagement with a supplier.

3.2 Policy

The Dyson Group communicates its standards and expectations to suppliers through the Dyson Ethical and Environmental Code of Conduct (the "Code of Conduct") which incorporates international labour and human rights principles and national laws. The Code of Conduct sets out requirements for the Dyson Group's own manufacturing operations and its suppliers in relation to labour practices; the environment; health and safety; worker accommodation; responsible sourcing; and ethical business practices. The Code of Conduct prohibits all forms of slavery, human trafficking, forced labour and child labour.

The Code of Conduct forms part of the contract with a supplier and is communicated to suppliers during their on-boarding process. The Code of Conduct is supplemented by additional policies and standards outlining specific requirements to ensure fair and ethical practices between suppliers and their workers. Policies are updated at regular intervals to ensure they remain in line with legal requirements and industry best practice.

During 2024, the Dyson Group's updated Code of Conduct was rolled out to the Dyson Group's own manufacturing operations, as well as contract manufacturers, direct and indirect suppliers. The Dyson Global Child Labour Prevention and Remediation Standard was established in 2024.

3.3 Risk assessment

Risk assessments are carried out on suppliers using Sedex, an industry recognised risk assessment platform. During registration and onboarding, suppliers are required to complete a detailed self-assessment questionnaire which covers labour standards, business ethics, health and safety and management systems. Sedex's risk assessment tool helps identify suppliers operating in high-risk environments, or with workers who are more vulnerable to exploitation. The results of these risk assessments determine whether the Dyson Group will begin to work with a supplier, and also informs future audit selection and frequency.

In addition, Supplier Scorecards are maintained across all contract manufacturers with key performance indicators (KPIs) related to labour standards; wages, benefits and working hours; health and safety; environment; ethics and management systems. Scorecards are updated and reviewed on a monthly basis as part of supplier monitoring. When KPI performance dips, this allows for fast, targeted remediation by the supplier responsible.

3.4 Audit

Regular audits are conducted of the Dyson Group's own manufacturing operations and of suppliers by the Dyson Group's specialist CSER team and external independent audit partners. These audits are usually conducted on a semi-announced or unannounced basis.

Audits assess adherence to Dyson's Ethical and Environmental Code of Conduct, and associated policies and standards. Auditors interview a cross-section of the workforce without management presence (with translators, if required). It is the supplier's responsibility to meet the Dyson Group's standards and comply with all relevant legal requirements. If suppliers do not meet Dyson's requirements, Dyson collaborates with the supplier to resolve the identified issues through a Corrective Action Plan (CAP). A re-audit is then arranged within an appropriate timeframe. Suppliers failing two consecutive audits face sanctions and may only resume business after passing a new audit and addressing all corrective actions. If performance does not improve or the supplier does not prioritise corrections to its operations, the Dyson Group reserves the right to end the relationship.

Dyson is a member of the Responsible Business Alliance (RBA) and uses RBA audit results and risk assessments to assess RBA member suppliers.

3.5 Grievance mechanism

Workers in the Dyson Group's operations and the majority of contract manufacturer facilities have access to an independent confidential helpline provided by third-party vendor, NAVEX, where they can raise concerns, with the option to do so anonymously. The helpline is available in local languages, and reports are investigated by the Dyson Group and resolved with remedial actions mandated where required. The Dyson Group also has a non-retaliation policy in relation to those who report such matters. Beyond NAVEX, all contract manufacturers and suppliers are obliged to have programmes in place to ensure that whistleblowers may raise concerns confidentially, anonymously and without fear of retaliation, as stipulated in the Code of Conduct.

4.0 Identified potential risks 2024

Risks of modern slavery and child labour are identified by the Dyson Group level through a combination of risk assessments, audits and grievance mechanisms and using external reference points such as the US Trafficking in Persons Report. Within the calendar year of 2024, the identified areas of on-going potential risk within the technology industry include:

- Forced labour
- Working hours, wages and benefits
- Raw material sourcing and child labour

4.1 Risk of forced labour

The manufacturing industry can involve a high proportion of migrant workers. This can present an inherent risk of non-compliant recruitment practices by recruitment agencies.

In 2024, enhanced due diligence efforts included training for contract manufacturer recruitment agencies, to promote the use of agencies certified by The Fair Hiring Initiative's "On The Level" (OTL) programme.

As a result, over 80% of the agencies completed the OTL programme successfully, improving their audit scores and reducing the risk of non-compliant recruitment practices. Further progress will be made in 2025 with the remaining agencies.

Complex and multi-tiered supply chains, which may also utilise migrant workers, present the inherent risk of potential involuntary labour and/or overtime. Identifying and addressing this risk in the lower tiers of the supply chain is challenging, due to limited visibility and leverage.

In 2024, the Dyson Group continued and expanded enhanced forced labour due diligence for selected strategic sub-tiers of contract manufacturers, including specific training and audits on ILO forced labour standards and responsible recruitment principles. The Dyson Group also increased the number of unannounced spot audits. Where corrective actions are identified, the Dyson Group is committed to achieving full compliance.

4.2 Risk of non-compliant working hours, wages and benefits

A potential risk throughout manufacturing supply chains is non-compliance with working hours legislation (including overtime, inaccurate or unpaid wages, and the non-provision of benefits). This can particularly affect migrant worker populations.

Alongside the Dyson Group's established Sustainable Supply Chain Programme, specific mitigating activities include:

- Supplier Scorecard: Monthly monitoring of contract manufacturer key performance indicators (KPIs) including labour standards, as set out in the Dyson Group's Ethical and Environmental Code of Conduct. Engagement and training on these topics have resulted in improved compliance.
- Cross-functional working: CSER, Procurement and Commercial teams collaborate to reward good practice.

4.3 Raw material sourcing risks

Complex and multi-tiered technology supply chains, which include the sourcing of raw materials and minerals, present potential risks related to modern slavery and child labour. Identifying and addressing these risks in the lower tiers of the supply chain can be challenging, due to limited visibility and leverage.

- In 2024, the Dyson Group expanded conflict mineral¹ and child labour traceability efforts, focussing on the upstream supply chains of key suppliers. The Dyson Group supported a key supplier to improve conformance rates of smelters/refiners with the Responsible Minerals Assurance Process (RMAP) audit, and therefore reduce labour risks within their supply chain.

During the calendar year of 2024, no concerns of child labour were identified and therefore no remedial measures were undertaken.

5.0 Training

Maintaining and developing capacity and capability within supplier facing teams is a priority for the Dyson Group. Where possible, external experts are engaged to enhance the teams' technical expertise and keep up to date with industry best practice. Training to note during 2024 includes:

- 54 suppliers attended training on forced labour issues and how to proactively address them, delivered in collaboration with Responsible Business Alliance (RBA).
- Over 200 targeted internal stakeholders, as well as 285 suppliers received training on the updated Ethical and Environmental Code of Conduct requirements.
- The Dyson Group's internal Modern Slavery and Child Labour prevention e-learning module has been updated to reflect revisions to the Ethical and Environmental Code of Conduct, as well as increasing regulation on these topics. This will be rolled out to over 1,000 supplier facing employees in 2025.

6.0 Taking effective action in 2024

Dyson understands that continuous focus and action is required to assess and address the risks of modern slavery and child labour in own operations and supply chains. The Dyson Group's Sustainable Supply Chain Programme includes management systems to measure the effectiveness of actions taken. Actions and measures to note in 2024 include:

Enhanced due diligence via increased audit coverage: 329 audits were completed in FY2024, an 18% increase on 2023.

Supplier management: Suppliers are regularly assessed through a combination of audits and performance scorecards. In addition, Dyson held supplier training days to foster supplier engagement and share best practice.

Governance: Dyson's Sustainable Supply Chain Council provides oversight of supplier performance, enabling targeted action and monitoring adherence to Dyson's Ethical and Environmental Code of Conduct.

1. "Conflict minerals" describes tin, tungsten, tantalum and gold extracted from regions where mining and trading can be used to fund armed conflict, widespread violence or other human rights abuses. These regions are known as conflict-affected and high-risk areas ([OECD Due Diligence Guidance](#)).

7.0 Approval

Dyson remains dedicated to continuing efforts to assess and address modern slavery and child labour risks in its operations and supply chain.

This statement for Dyson Canada Limited FY2024 was approved by the Board of Dyson Canada Limited on the 15 May 2025.

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 or entities 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. I have the legal authority to bind Dyson Canada Limited.

Signed by:

Delphine Le Romain

Delphine Le Romain, Board Member of Dyson Canada Limited
15 May 2025

8.0 Appendix

This Statement is made pursuant to section 4(a) of Bill S-211.

This Statement was developed by the Dyson Group's Corporate Sustainability and Reporting team, through a process of consultation and collaboration with stakeholders across Dyson's reporting and non-reporting entities, including the Legal Compliance and Ethics team, regional Legal teams, and the Corporate Social and Environmental Responsibility team. Advisory consultation with external stakeholders was also sought where appropriate.

The table below outlines where information related to each reporting criteria can be found:

Mandatory criteria	Page number
a) Its structure, activities and supply chains.	2
b) Its policies and its due diligence processes in relation to forced labour and child labour.	3
c) The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.	5, 6
d) Any measures taken to remediate any forced labour or child labour.	5, 6
e) Any measures 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.	N/A
f) The training provided to employees on forced and labour and child labour.	6
g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	6