

Cintas Corporation No. 2 and Cintas Canada Limited
– Statutes of Canada 2023, c. 9 Joint Report

In 2023, the Canadian Parliament passed Bill S-211, *An Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (Statutes of Canada 2023, Chapter 9) (the “Act”). The Act requires covered entities to file a report with the Canadian Minister of Public Safety (“PS Canada”) outlining the measures the covered entity has taken to prevent and reduce the risk of forced labour or child labour in their supply chains.

In accordance with Section 11 of the Act, this joint report is submitted on behalf of Cintas Corporation No. 2 and Cintas Canada Limited for the reporting year June 1, 2022 to May 31, 2023 (the “Covered Period”).

Cintas Corporation No. 2, its subsidiaries, including Cintas Canada Limited, and its management are committed to complying with the laws and regulations of all jurisdictions in which they conduct business. Cintas Corporation No. 2 has implemented forced labour and supply chain due diligence protocols to prevent the use of forced labour, child labour, and indentured labour (hereinafter referred to as “forced labour”) in its supply chains. Cintas Corporation No. 2 requires that all subsidiaries, including Cintas Canada Limited, implement these same policies. Because Cintas Corporation No. 2 and Cintas Canada Limited have the same policies and similar risk profiles, they hereby submit a joint report pursuant to PS Canada guidance. Cintas Corporation No. 2 is also required to disclose its supply chain policies and procedures in accordance with the California Transparency in Supply Chains Act.

I. DESCRIPTION OF STEPS TAKEN TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

Under Section 11 of the Act, covered entities are required to publish a report annually outlining the steps they have taken to prevent and reduce the risks of forced labour and child labour in their supply chains. Cintas Corporation No. 2 and Cintas Canada Limited are committed to responsible sourcing, as evidenced by the policies and procedures they have established.

A. The Company’s Structure, Activities, and Supply Chains (Subsection 11(3)(a))

Cintas Corporation No. 2 is headquartered in Mason, Ohio, with facilities across North America. Cintas Canada Limited (business number 888689734) is located at 6300 Kennedy Rd, Unit 3, Mississauga, ON, L5T 2X5. Cintas Corporation No. 2 is the parent and controlling entity of Cintas Canada Limited, and Cintas Canada Limited imports merchandise into Canada for sale within the country. The policies and supply chain information described herein apply to both Cintas Corporation No. 2 and Cintas Canada Limited. Therefore, the companies are hereinafter referenced collectively as the “Company” or “Cintas.”

Cintas is an industry leader in the design, manufacture, and supply of corporate uniform programs to businesses in North America. Cintas also provides a variety of other products and services, including industrial supply services, entrance mats, restroom supplies, promotional products, first aid and safety products/services, and fire protection products/services. Cintas

sources and/or produces goods at both related and unrelated factories located in the United States, Mexico, Canada, Central America, South America, Europe, and Asia. Cintas has not identified or been notified during the Covered Period of child labour or forced labour being used by its suppliers.

B. The Company's Supply Chain Due Diligence Program

1. The Company's Due Diligence Policies (Subsection 11(3)(b))

Cintas is committed to conducting business in a legally compliant and ethical manner and prohibits the use of forced labour anywhere in the Company's supply chains. Cintas' forced labour and supply chain due diligence protocols are developed with the goal of preventing the use of forced labour in its supply chains. Cintas complies with applicable labour laws in all the jurisdictions in which it operates and in accordance with human rights and international labour standards recognized under the International Labour Organization ("ILO").

Cintas prohibits the use of forced labour both internally and by its business partners, as reinforced by its corporate codes and policies:

- **Cintas Code of Conduct and Business Ethics**¹ ("Code of Conduct") – This Code of Conduct requires Cintas' employee-partners and those who conduct business on the Company's behalf to do so in a manner that complies with all applicable laws, rules, and regulations in the countries in which the Company operates. Cintas' Code of Conduct expressly maintains its commitment to a respectful, safe, and healthy workplace environment, and does not condone violence of any kind.
- **Code of Conduct for Vendors**² ("Vendor Code") – This Vendor Code sets forth Cintas' commitment to condemning the use of forced labour and maintaining a fair, respectful, and safe work environment at the vendors in the Company's supply chains.
- **Policy and Statement on Human Rights**³ – This Policy and Statement defines Cintas' commitment to respecting internationally recognized human rights and sets out the values and principles that guide the Company's activities. Specifically, Cintas rejects the use of forced labour in its supply chains and emphasizes this commitment in its policies.
- **Cintas Corporation Sustainability Report**⁴ ("Sustainability Report") – Cintas publishes a Sustainability Report annually on its website highlighting the Company's core values on Environmental, Social, and Governance measures.

¹ https://www.cintas.com/pdf/cintas-coc-english.pdf?utm_source=print&utm_medium=collateral&utm_campaign=CAESG.

² https://www.cintas.com/supplier-relationships/vendor-compliance/?utm_source=print&utm_medium=collateral&utm_campaign=CAESG.

³ https://www.cintas.com/docs/default-source/esg/position-statements/human-rights-position-statement.pdf?sfvrsn=e6a55626_7.

⁴ https://cintas.widen.net/view/pdf/nvi2tgy9ad/Cintas_2023_Sustainability_Report_011824.pdf?u=zfbcz7.

- **Other Commitments and Initiatives** – Cintas has taken additional measures to evaluate its due diligence programs and keep its personnel apprised of developments within the industry and supply chain management as a whole. To this end, Cintas regularly consults with customs counsel and is a member of the American Apparel and Footwear Association (“AAFA”) and AAFA’s forced labour working group.

2. The Company’s Due Diligence Processes (Subsection 11(3)(b) and (c))

Cintas has implemented a supply chain management system that incorporates traceability and due diligence. This supply chain management system begins with the comprehensive diligence policies and procedures discussed above and requires diligence during the supplier onboarding process as well as during the supplier relationship. Employee-partners within the Cintas organization and strategic suppliers are made aware of and expected to abide by the Cintas Code of Conduct, the Vendor Code, and Cintas’ position on human rights.

i. Verification of Supply Chain

Under Cintas’ supply chain management system, the Company reviews strategic suppliers for potential indications of human rights violations through an audit and/or certification process. Cintas requires strategic suppliers to be verified through this process before the vendor can be added to the Cintas internal system as an “approved” supplier. No purchase orders can be issued until that supplier is verified.

ii. Evaluation of Risk (Subsection 11(3)(c))

As a supplier of corporate uniforms and related products, Cintas recognizes that certain inputs may present a risk of forced labour being used in sourcing or production. Cintas has taken steps to identify these risks based on governmental and non-governmental organization resources and publications. Additionally, through its supply chain mapping processes, Cintas has assessed the potential risks presented by suppliers based on the region of their facilities and their upstream sub-tier suppliers. The Company requires strategic suppliers to be compliant with its Vendor Code and have a valid and current audit certification.

iii. Risk Assessment Audit Process

Cintas uses an audit process to guard against risk in its supply chains. The Company requires strategic suppliers to provide evidence of a valid and current third-party audit certificate from pre-determined social audit platforms. If a strategic supplier cannot do so, then the Company requires that supplier to go through a third-party audit that assesses the supplier based on its general ethical standards, customs compliance, wages and hours policies, and whether the supplier shows risks of prison or forced labour, or discrimination and harassment. Cintas or a third-party auditor will also review the potential supplier’s facilities to ensure their working conditions present a healthy and safe environment for the supplier’s employees.

Cintas maintains the contractual right to perform compliance audits at supplier facilities. Cintas requires its strategic suppliers to provide Cintas representatives with full access to their production facilities, employee records, and employees for confidential interviews. Strategic suppliers must also provide a current and valid audit certification on an annual basis.

iv. Certifying Supplier Compliance

In addition to the audit processes discussed above, strategic suppliers are required to attest that they have read, understand, and comply with the values outlined in the Vendor Code. Furthermore, as part of its standard purchase agreement terms, the Company requires strategic suppliers to confirm that they comply with applicable laws and regulations in the regions in which they operate. Cintas also requires its strategic suppliers to certify on a yearly basis that they neither use forced labour nor have forced labour in their supply chains.

C. Training (Subsection 11(3)(f))

Cintas requires that all employee-partners attend an annual training to ensure that they understand and comply with the values set forth in the Company's Code of Conduct. Cintas has also developed trainings with the assistance of third-party and industry experts to further promote its culture of sustainability and compliance. This training covers various topics such as ethics, compliance, and health and safety, with specific trainings assigned by job and scope of work. Employee-partners with direct responsibility for supply chain management receive internal training on social issues such as the risk of child labour, human trafficking, and modern slavery.

Trainings are offered in-person, on demand, and through live virtual sessions. Cintas maintains training attendance records to confirm that all employees have attended mandatory trainings. Employee-partners are also evaluated by written, verbal, or skill-based assessments.

D. Remediation Measures (Subsections 11(3)(d) and (e))

Cintas is committed to regularly engaging with its supply chain to ensure that its strategic suppliers are meeting the standards of the Vendor Code and other policies. This is verified through the independent audit process. In the event that risk is identified during an independent auditor assessment, the auditor will issue a Corrective Action Plan ("CAP") to remedy and prevent compliance risks. Cintas will collaborate with the independent auditor and supplier to ensure that the CAP is resolved. Cintas has not identified risks of forced or child labour in its supply chain during the Covered Period that would require issuance of a CAP or termination of a business relationship with a strategic supplier.

If an employee-partner or supplier is found to be non-compliant with the Company's policies, the Company requires that the employee-partner or supplier take immediate corrective actions. For serious non-compliance actions, Cintas may terminate any employee-partner or supplier.

To the Company's knowledge, vulnerable families have not experienced loss of income as a result of steps the Company has taken to eliminate forced labour or child labour risks.

II. CINTAS' RISK ASSESSMENT ANALYSIS (SUBSECTION 11(3)(G))

Cintas has taken steps to assess the effectiveness of its due diligence and risk assessment procedures. Cintas has engaged customs counsel to perform a comprehensive review of its policies and procedures. Additionally, the Company regularly works with third-party auditors to assess strategic suppliers and identify potential supply chain risks. Cintas is also a member of industry groups, including AAFA, to collaborate with members of the industry on best practices.

Cintas has also developed a grievance system (known as Direct Line) whereby employee-partners can make anonymous complaints for allegations of human rights abuses, forced labour, or other alleged wrongdoing in the supply chain. Through the Vendor Code, Cintas will also promote awareness of its Direct Line grievance system to suppliers.

[Attestation Page Follows]

III. 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 entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this joint report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Cintas Corporation No. 2

The Report was approved pursuant to section 11(4)(b)(ii) of the Act by the Board of Directors of Cintas Corporation No. 2, as the governing body of Cintas Canada Limited, on May 30 2024.

Full Name of Director: D. BROCK DENTON

Title: SENIOR VICE PRESIDENT, SECRETARY & GENERAL COUNSEL

Date: MAY 30, 2024

Signature: 

I have authority to bind Cintas Corporation No. 2 and Cintas Canada Limited