



# Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

Prepared by Memory Express Inc.  
For the Financial Year Ended December 31, 2024

---

## Introduction

This report is made pursuant to **subsection 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act**, S.C. 2023, c.9 (the “Act”), and has been prepared on behalf of **Memory Express Inc.** (“Memory Express” or the “Company” or “we” or “our”). This constitutes the first report prepared by Memory Express Inc. pursuant to the Act and outlines the steps taken during the financial year ended December 31, 2024, to prevent and reduce the risk of forced labour or child labour being used at any step of the production of goods that we import into Canada or sell in Canada.

We consider respect for human rights a fundamental corporate responsibility and a core value guiding all of our operations. We are committed to being a responsible employer and a trustworthy business partner. We will not tolerate the use of forced labour, child labour, human trafficking, or any form of modern slavery in our operations or supply chains.

This report outlines the actions taken in 2024 and highlights our **commitments for continuous improvement**, aligned with the **United Nations Guiding Principles on Business and Human Rights**.

---

## Structure, Activities, and Supply Chains

**Memory Express Inc.** is a privately owned Canadian company headquartered in Alberta. Since its founding in 1996, the Company has grown to become one of Canada’s leading retailers of computers, consumer electronics, and information technology solutions. Our head office is located in Calgary, Alberta, with retail locations across multiple provinces including Alberta, British Columbia, Manitoba, Saskatchewan and Ontario. Memory Express operates independently and is not a subsidiary of any other corporation.

Our primary business is **reselling technology products**. We source inventory from a wide network of both **domestic and international suppliers**, including many globally recognized technology brands. Our supply chain includes the manufacturing, assembly, and distribution of computer components, accessories, and peripherals.

Many of our major suppliers are already subject to international corporate social responsibility requirements and have published modern slavery or sustainability statements under **laws such as the UK Modern Slavery Act** and the **California Transparency in Supply Chains Act**.

---

## Policies, Programs, and Due Diligence Processes

Memory Express Inc. is committed to ethical procurement practices and responsible business conduct. Our current due diligence measures include:

- Vetting new suppliers for business integrity and compliance with legal and ethical standards.
- Communicating our expectations for lawful, fair, and ethical labour practices.
- Requiring internal teams to adhere to strict codes of conduct and compliance obligations.

We are currently evaluating ways to strengthen our approach by:

- **Finalizing a Supplier Code of Conduct.**
- **Introducing contract clauses** requiring compliance with anti-forced labour and anti-child labour laws.

---

## Employment and Training

We are committed to providing a healthy, safe, and inclusive work environment for all employees. Our Employee Handbook outlines the values and ethical responsibilities expected of all staff. This includes zero tolerance for any form of forced or exploitative labour.

All new employees undergo onboarding training that includes a review of our ethical expectations. In 2025, we plan to expand this training to include specific modules on forced labour, child labour, and supplier due diligence requirements related to the Act.

---

## Reporting Mechanisms and Non-Retaliation

Memory Express Inc. supports a workplace culture that encourages employees to report unethical or illegal conduct without fear of retaliation. Any employee, contractor, or third party who becomes aware of suspected violations — including the use of forced or child labour — is encouraged to report the concern to our Human Resources Department or senior management.

---

## Risk Assessment and Remediation

We acknowledge that the electronics industry — including the production of components and raw materials — may involve elevated risks related to forced or child labour, particularly in regions with less robust enforcement of labour laws.

To date, **Memory Express Inc. has not identified any confirmed instances** of forced labour or child labour in our operations or immediate supply chains. Consequently, we have not had to undertake remediation or compensation activities. However, we are aware of the need for continuous vigilance and improvement.

Future steps include:

- Finalize our **Supplier Code of Conduct** and distribute it to all Tier 1 suppliers.
- Add **forced labour compliance clauses** into all new supplier agreements.
- Review partnerships with suppliers who **lack public commitments or transparency** around modern slavery.

---

## Effectiveness and Continuous Improvement

While Memory Express Inc. has taken preliminary steps to mitigate the risk of forced or child labour, we recognize that measuring the effectiveness of these actions is critical. In 2025, we plan to develop a framework for assessing the effectiveness of our policies, training, and supplier engagement initiatives.

Our ongoing priorities include:

- Enhancing visibility across our supply chains.
  - Formalizing compliance requirements for suppliers.
  - Increasing internal awareness and accountability.
-


## Approval and Attestation

This report was approved by the Board of Directors of **Memory Express Inc.** pursuant to subparagraph 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this 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.

**Name:** Yet Ngo

**Title:** Director, Memory Express Inc.

**Signature:**  \_\_\_\_\_

**Date:** June 24, 2025 \_\_\_\_\_

---