



GURU ORGANIC ENERGY CORP.

**Report Forced Labour and Child Labour
Risks**

Year ended October 31, 2025

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1. Introduction

This report is produced by GURU Organic Energy Corp. for the financial year ending October 31, 2025. As of October 31, 2025, the wholly owned subsidiaries included in scope of this report are GURU Beverage Inc. (“GURU Canada”), a corporation incorporated under the CBCA, and GURU Beverage Co. (“GURU USA”), a corporation incorporated under the Delaware General Corporation Law. The terms “we,” “our,” “us,” “Corporation,” and “GURU” as used in this report refer collectively to GURU Organic Energy Corp., GURU Canada and GURU USA, to one or more of them, or to those who work for them.

The report sets out the steps taken to prevent and reduce the risk that forced labour or child labour (also known as modern slavery) is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Corporation. This report is prepared by the Corporation according to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

2. Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

We remain committed to taking concrete actions to prevent and reduce the risks of forced labour and child labour in our activities and supply chain. Building on our commitment from last year, we have made meaningful progress in 2025 by implementing the following measures:

2.1. Training

In 2025, GURU launched a mandatory company-wide training to reinforce human rights awareness and embed ethical accountability across our supply chain operations. This mandatory training was delivered internally by our Human Resources team. It focused on three core objectives:

- Understanding our obligations and commitments under the Fighting Against Forced Labour and Child Labour in Supply Chains Act.
- Learning key internal policies and operational requirements for supplier compliance.
- Recognizing individual roles and responsibilities in identifying, escalating, and upholding ethical supply chain practices.

2.2. Preliminary Risk Assessment

To strengthen proactive risk identification, we developed a 25-question modern slavery risk assessment questionnaire in 2024 to evaluate supplier exposure to forced labour, child labour, and other forms of modern slavery within our raw material supply network.

The questionnaire was first distributed to our largest raw material suppliers, representing 95% of our 2024 fiscal spend. The initial response rate reached 50%.

In 2025, we set a target to secure responses covering at least 80% of our annual raw material spend to better identify key areas requiring follow-up. This target was achieved, with a final response rate of 82%, representing 82% of our 2025 fiscal raw material spend.

The results of this assessment will now be used to establish supplier risk profiles and guide next steps, including enhanced due diligence, corrective action planning, or onboarding restrictions where appropriate.

2.3. Supplier Code of Conduct

We maintained our requirement that all suppliers adhere to our Supplier Code of Conduct, setting clear expectations for them to operate with integrity, respect human rights, and comply with all applicable labour laws. The Code outlines specific requirements related to fair working conditions, the prevention of forced labour, and the prohibition of child labour. Going forward, any new supplier projected to represent more than 3% of our annual raw material spend must sign the Supplier Code of Conduct and complete the modern slavery risk assessment questionnaire prior to onboarding. This threshold ensures heightened diligence on suppliers with the greatest operational and financial impact to our supply chain.

3. Structure, Activities and Supply Chains

3.1. Structure

GURU Organic Energy Corp. is incorporated under the Canada Business Corporations Act and is listed on the Toronto Stock Exchange. The Corporation is domiciled in Montreal, Quebec, Canada, where its administrative offices are located. It produces consolidated financial statements that comprise the Corporation and its wholly owned subsidiaries, GURU Canada and GURU USA. GURU produces, markets, and distributes energy drinks for sale in the Canadian and United States markets.

3.2. Activities

GURU is a dynamic, fast-growing beverage company launched in 1999, when it pioneered a natural, plant-based energy drink. The Corporation now markets organic energy drinks in Canada and across the United States through an estimated distribution network of more than 25,000 points of sale. GURU has built a brand around offering its customers “good energy” through energy drinks with a clean list of organic plant-based ingredients. The Corporation is committed to its mission of cleaning the energy drink industry.

GURU employs a comprehensive sales channel mix, encompassing convenience stores and gas stations, grocery stores, pharmacies, wholesale clubs, food service companies and online sales platforms in both Canada and the United States. This strategic approach ensures that its products are readily available to consumers across a wide range of locations, meeting the demands of diverse markets.

GURU’s activities consist of developing, marketing, selling and distributing natural, organic, plant-based (100% Crop Free™) energy drinks under the GURU brand name. Manufacturing is outsourced to a network of established third-party co-packers certified to manufacture organic products. Consequently, GURU does not own or rent any property, plant and equipment relating to its production facilities, nor is GURU subject to any payment terms, expiration dates and terms of

any renewal options of any material leases or mortgages in relation to the facilities used to produce its products.

The Corporation provides its production partners with the recipes, flavours, ingredient blends, cans and other raw materials for its beverages, purchased from various suppliers across the globe.

3.3. Supply Chains

At GURU, we hold the well-being of our employees, customers, and partners in the highest regard. We firmly believe that health and safety are non-negotiable aspects of any operation. Hence, we emphasize the importance of prioritizing health and safety across every facet of our business.

We have implemented rigorous controls and requirements to our supply chain to ensure that every product meets the highest health and safety standards. Central to this commitment is our approach to qualifying suppliers. We have established a comprehensive qualification process that evaluates suppliers not only on their product's quality and reliability but also on their adherence to stringent health and safety protocols.

GURU prioritizes long-term partnerships based on trust, integrity and ethics, such as those we have cultivated with flavor houses over the past decade. These partners adhere to rigorous sustainability standards and comprehensive risk assessment protocols to uphold excellence in manufacturing, ensure workplace hygiene, and safeguard human rights.

A substantial portion of our imports includes cane sugar and tea extracts, sourced from suppliers who hold Fair Trade certification, reflecting our ethical sourcing values. While smaller suppliers do not have formal certifications against forced labour and child labour, some are actively engaged in implementing policies and initiatives to uphold ethical standards in their operations.

GURU's supply chain begins with sourcing raw materials from various suppliers in different countries or regions. It ends with the sale of finished products, cans of organic energy drink, to our consumers via one of our distribution channels.

1. **Raw Material Sourcing:** Fruit juices and concentrates, flavors, sweeteners, acids, and herbal extracts are purchased directly or through brokers. Due to the nature and limited availability of our ingredients, we source raw materials from a network of suppliers located globally. To qualify, suppliers must meet an exhaustive list of criteria and provide the necessary documentation as proof such as:

- Quality Management Program
- Organic Certificate
- Food Grade Certificate
- Kosher Certificate
- GMO free Certificate
- Certificate of origin
- Flow chart of the production process
- Certificate of Analysis

- Material Safety Data Sheet

When raw materials cannot be sourced domestically, we import them into Canada from a range of international suppliers, including but not limited to Argentina, Brazil, China, Costa Rica, India, Mexico, Peru, the Philippines, Thailand, Turkey, and the United States. In 2025, less than 15% of our total raw material volume originated from countries identified as having an elevated risk of modern slavery—specifically Colombia, India, Mexico, Peru, the Philippines, Thailand, and Turkey¹. This represents a 5% decrease compared to 2024, despite the U.S. tariff measures that required us to shift procurement to alternative suppliers. To maintain reliability and oversight across these supply chains, we work exclusively through suppliers and brokers based in Canada, China, India, and the United States.

2. **Packaging:** The list of packaging required to manufacture our finished goods is limited to just a few items such as aluminum cans, aluminum tops, corrugated boxes, corrugated trays, and folding cartons. Our main packaging suppliers are among the most respected and recognized names in the industry. They are committed to respecting human rights and do not tolerate human trafficking, slavery, forced labour, corporal punishment, or child labour. Most of the packaging is purchased from North American suppliers. In some instances, packaging is sourced from European countries.
3. **Manufacturing and Production:** Once raw materials and packaging are procured, they are delivered to contract manufacturing facilities where they undergo processing and production. This stage involves blending, mixing, filling, and packing processes to create the beverage products. Manufacturing facilities are not owned by GURU. We have contractual agreements with co-packing facilities in Canada as well as in Europe for uncommon North American formats.
4. **Distribution:** After their release from quality assurance, packaged beverages are transported to one of our Canadian or American contract warehousing facilities. Distribution involves a network of logistics partners and transportation providers to reach retailers and wholesalers.
5. **Retail:** Finally, the beverages are sold to consumers through various Canadian and American retail channels such as supermarkets, convenience stores, online platforms, and specialty beverage stores. Retail locations may vary widely, from local shops to global chains.

¹ Raw material sourcing risk classifications are based on publicly available data from Walk Free's Global Slavery Index (www.walkfree.org). Countries were categorized as "higher risk" when the estimated prevalence of modern slavery exceeded 5 people per 1,000 population, according to the Index's most recent available country-level estimates.

4. Policies and Due Diligence Processes

In 2024, GURU initiated a review of its policies and due diligence processes implemented to prevent and reduce the risks associated with forced labour and child labour in its supply chains. These measures demonstrate GURU's dedication to sustainable practices, human rights protection, and its fervent pursuit of fostering a secure and inclusive environment for all employees and workers throughout its operations and supply chains.

4.1. Code of Ethics and Business Conduct

The Corporation is committed to maintaining high standards of integrity and accountability in conducting its business. The Code of Business Ethics and Business Conduct (the "Code of Ethics") provides a framework of guidelines and principles to govern our ethical and professional behaviour in conducting our business. In May 2024, we added a section to the Code of Ethics on the absolute prohibition of any form of forced labour, child labour, and human trafficking, and underscoring our expectation that both our workforce and business partners uphold the principles of human rights.

4.2. Supplier Code of Conduct

Our suppliers are critical partners in upholding strong ethical standards and advancing responsible, sustainable sourcing. In 2024, we formalized our Supplier Code of Conduct, outlining clear expectations for all suppliers conducting business with us. Aligned with the objectives of the Act, the Code includes specific provisions addressing forced labour and child labour. To ensure transparency, the Supplier Code of Conduct is publicly available on our website, reinforcing our commitment to ethical business conduct and responsible procurement.

In 2025, we began direct engagement with active suppliers to support adoption of these standards. To date, 75% of active suppliers have either signed our Supplier Code of Conduct or provided their own equivalent code of conduct.

To further strengthen supplier qualification, any new supplier projected to represent more than 3% of our annual raw material spend must sign the Supplier Code of Conduct and complete our supplier questionnaire prior to onboarding. We also plan to conduct a full review of our Supplier Code of Conduct in 2026 to ensure continued alignment with evolving regulatory and industry expectations.

4.3. Reporting Procedure

GURU has implemented a procedure that facilitates the reporting of various forms of misconduct, including any possible violation of the Code of Ethics, fraud, misappropriation of business property or any other illegal or unethical behavior. Our reporting procedure is accessible to anyone, including to our employees, customers, suppliers, partners, and any other stakeholder. Our Code of Ethics outlines the steps to report any socially reprehensible behaviour and provides mechanisms to ensure the confidentiality of the reporting process. As per the reporting

procedure, all our employees as well as customers, suppliers, partners or other third-parties have the responsibility of reporting any incidents they become aware of.

5. Forced Labour and Child Labour Risks

GURU considers the risk of forced labour or child labour to be low in its internal operations, which are exclusively based in Canada and the United States. Canadian and United States employees are always governed by the Corporation's Code of Ethics and benefit from the legal protections offered by their local jurisdiction, including during the hiring process.

We also assess the risk to be low within our direct supplier relationships, as we work exclusively with suppliers operating in Canada, China, India, and the United States. However, because many of our raw materials originate from countries around the world, we acknowledge the need to ensure that our suppliers actively assess and address the risk of forced labour, child labour, or other forms of modern slavery within their own upstream supply chains.

In 2026, we will expand our focus to raw materials sourced from regions with a higher prevalence of modern slavery. Working collaboratively with our suppliers, we aim to deepen our understanding of inherent risks and identify actions that can reduce and mitigate those risks across the broader supply chain.

6. Remediation Measures

To date, we have not identified any occurrences of forced labour or child labour in our activities or supply chains, and therefore, no remedial measures were taken, including those related to remediating the economic impact on the most vulnerable families. Nevertheless, we must remain vigilant. If we were to identify incidents of forced labour within our activities or supply chains, we would evaluate and implement the necessary remediation strategies.

7. Training

At GURU, we are committed to fostering a culture of responsibility and ethical awareness across our organization. All new employees complete onboarding sessions covering the Corporation's Code of Ethics and Supplier Code of Conduct, ensuring that every team member understands the standards we uphold.

In 2024, we further strengthened our internal capabilities by joining an ESG coaching program aimed at assessing our current maturity level, defining future targets, and outlining a clear roadmap for improvement.

Building on this foundation, in 2025 we launched mandatory company-wide training delivered by our Human Resources team to reinforce human rights awareness and embed ethical accountability across supply chain-related activities. This training supports employees in understanding our obligations under the Fighting Against Forced Labour and Child Labour in Supply Chains Act, applying internal policies, and recognizing their responsibility to identify and escalate potential risks.

To support transparency and shared accountability, the 2025 annual report will be distributed to all employees, along with the sources of data used to evaluate modern slavery risk within our supply chain.

This ongoing training approach reflects our commitment to continuous improvement and ensures that our workforce remains equipped to uphold ethical practices throughout our supply chain.

8. Assessing Effectiveness

While we have not yet conducted assessments to gauge the effectiveness of the measures that have been or are being implemented, GURU intends to carry out such evaluations next year. In 2026, GURU intends to evaluate program effectiveness using measurable indicators such as supplier participation rates, questionnaire scoring trends & training completion rates.

9. Approval and attestation

This report was approved under subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of GURU Organic Energy Corp.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entities listed at the first section of this report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year mentioned at the first section of this report.

I have the authority to bind GURU Organic Energy Corp.

Per: _____

Full Name: Carl Goyette
Title: President & CEO, Director
Date: January 21, 2026