

Original email sent from Above Ground on August 29, 2022:

Dear Latoplast Representative,

I'm writing to you on behalf of Above Ground, a civil society initiative that seeks to ensure companies based in Canada or supported by the Canadian state respect human rights wherever they operate.

We are preparing to issue a publication highlighting potential Canadian business ties to forced labour abroad, which will identify companies that have imported into Canada goods made by manufacturers suspected of using forced labour. By reviewing U.S. shipment records (bills of lading) accessed through the Panjiva import database, we determined that between July 15, 2020 and September 2021, several shipments of gloves were sent from the manufacturer Top Glove in Malaysia to Latoplast at an address in Canada. If you believe your company has been wrongly listed as the recipient of these shipments, please advise me immediately.

Note that on July 15, 2020, U.S. Customs and Border Protection issued a detention order on disposable gloves made by Top Glove, restricting their entry into U.S. commerce, after [it determined](#) these gloves were “reasonably indicated to be manufactured by forced labor in Malaysia.” The order remained in place until September 10, 2021.

Your company may therefore be named in our publication, alongside other firms that have imported into Canada goods from manufacturers of concern. Our publication may also discuss any public comment your company has made regarding its business with Top Glove, or further information you may wish to provide now.

If your company wishes to provide a response for us to include in our report, we invite you to reply to this email by **September 19, 2022**. If you need slightly more time to respond, please advise as soon as possible. You can reply to me directly until September 8, 2022. After that I will be on a temporary leave so please contact Above Ground Director Karen Hamilton at khamilton@aboveground.ngo.

We thank you for your attention to this important matter.

Kind regards,

Georgina Alonso
[Program officer, Above Ground]

More about our research process:

Above Ground's research is based on shipment records ([bills of lading](#)). For many shipments arriving at U.S. ports, including those en route to Canada, these records [are made accessible](#) to the public by companies such as Panjiva and Import Genius. We searched Panjiva's database for shipments sent to consignees (recipients) in Canada in

which a manufacturer from one or more of the following categories was listed as a shipper or named in the description of goods shipped:

- Manufacturers whose products were subject, as of June 2021, to withhold release orders in the U.S. (These orders are [issued by the U.S. government](#) when it finds “information reasonably but not conclusively indicates” the goods were produced in whole or part by forced labour. The full list of past and active withhold release orders can be found [here](#).)
- Manufacturers that the U.S. government placed on its Entity List on June 22, 2020, citing their involvement in forced labour. (See the [Federal Register notice](#) of the addition of these companies to the list. The full entity list can be found [here](#).)
- Manufacturers reported by the [Australian Strategic Policy Institute](#) in March 2020 as having allegedly employed Turkic ethnic minorities in or from Xinjiang, China, through coercive state-run “poverty alleviation” programs widely condemned as forced labour schemes. (The time range of their alleged participation in these programs varied.)

To identify Canadian-bound shipments linked to each manufacturer, we ran a search for shipment records with the company’s name in the fields “shipper,” “shipper (original format),” or “goods shipped.” We filtered the results to include only shipments sent to a consignee in Canada during a relevant time frame, which varied depending on the manufacturer. The Panjiva search results are presented in tables that can be downloaded, each line containing a single shipment record. We examined each record to verify that the manufacturer in question was involved, and where relevant, that the goods shipped were those under a U.S. withhold release order. We deleted the irrelevant records, then counted the number of shipment records for each consignee (recipient).

Reply from Forcefield Canada, one of Latoplast’s brands, on October 13, 2022:

Hi Karen,

Please see our attached statement regarding Top Glove.

You should not that the import ban was lifted in September 2021:

<https://www.reuters.com/business/malaysias-top-glove-says-cleared-resume-business-wit-h-us-2021-09-10/>

"In a statement, the CBP said it will now allow imports after a thorough review of evidence that showed Top Glove has addressed all indicators of forced labour."

I would suggest you include these facts in your publication.

Also note in the past year our purchases from them have been very little as the market for disposable gloves has changed dramatically.

Any questions let me know thanks

Alex Batler
VP Sales & Marketing, Forcefield Canada

January 18, 2021

Dear Valued Customers,

You may be aware of allegations that CBC Marketplace has made with respect to worker abuse in disposable glove factories in Malaysia.

One of these factories, Top Glove, is a factory we have worked with over the years, and who does produce certain styles of disposable Nitrile and Latex gloves in the Forcefield product line. Top Glove is the only factory we work with in Malaysia. The majority of our disposable glove suppliers are in China and Thailand.

Without a doubt, these allegations are of great concern to us. At the same time, the Marketplace story did not offer the full background of ongoing investigations and subsequent actions.

In fact, for more than a year, Top Glove has been very active remedying this situation and has made **measurable** progress on all the issues. Here is a quick summary of the steps they have taken over the past year, with a full statement and press releases from Top Glove below.

Recruitment Fees: Since February 2019 there have been no recruitment fees to be paid by the worker. A repayment program is in effect and is 1/3 complete.

Overtime: Overtime levels are now in compliance with Malaysian Labour Laws. All overtime is voluntary.

Workers Safety and Working Conditions: An enhanced Worker Safety Program is in effect.

Covid Response: The Malaysian Government has allowed their factories to re-open after a quarantine period and Top Glove is in full compliance with Malaysian Covid Worker Safety protocols.

Workers' Accommodations: New accommodations have been built and rented. More are on the way.

For the time being we believe that by continuing to engage with Top Glove, we are in a position to better monitor and encourage their Corrective Action Plans and to push them towards Full Compliance. Should this improvement not continue, we will most definitely take further appropriate action.

Most Sincerely,



Bruce Batler, President

Dear Latoplast,

Thank you for sharing the information with us.

We would like to clarify on some of the issue highlighted and implied in the article.

1) Workers' recruitment fees:

a) Since January 2019, Top Glove has implemented a Zero Cost Recruitment Policy. Under this policy, our foreign workers DO NOT pay any recruitment fees as Top Glove bears all recruitment-related fees for our foreign workers.

b) Additionally, the Zero Cost Recruitment Policy stipulates pre-departure orientations and interviews at the source country, post-arrival orientations in Malaysia, and monthly interviews with workers to ensure that they have not paid any hidden fees to recruitment agents.

c) Under this policy, Top Glove reimburses workers who have paid recruitment fees to agents at their source country, supported by all workers signing a Letter of Undertaking committing that they will not pay recruitment fees during the recruitment process.

d) Top Glove is already making remediation payment to its migrant workers, after the completion of verification by an international independent consultant. To date, we have made five rounds of remediation payments (from August to December 2020) amounting to RM50 million (USD12.5 million) from the total RM136 million (USD34 million) that was recommended by the independent consultant, which the Group has committed to honour.

e) To support these remedial actions, Top Glove has blacklisted 2 unethical recruitment agents through a robust due diligence procedure and all business dealings with such recruitment agents are terminated with immediate effect. We are currently working with 11 principled recruitment agencies in Malaysia and from overseas. Top Glove too continues to educate our workers not to pay recruitment fees to third parties.

f) More importantly, the independent international consultant who audited us from the period of August to October 2020, has cleared us of the 11 forced labour indicators as per the International Labour Organisation standards save for one item, on Act 446, which is a work in progress between Top Glove and the relevant Ministry and Labour Department as clearly outlined in Point 2 (below).

2) Work Hour

a) We also wish to state that Top Glove's workers do not perform excessive overtime and are given rest days in line with the Malaysian labour law, which is 104 hours overtime per month and one (1) rest day per week, respectively.

b) Overtime is solely performed on a voluntary basis and workers are only allowed to perform overtime if they have not exceeded the daily maximum allowable working hours.

c) Towards this, Top Glove strictly monitors rest days and overtime hours clocked to ensure full compliance with the country's labour law. This has been verified by external audits and the Malaysian government authorities.

3) Safety of worker

a) Top Glove is one of few manufacturing companies in Malaysia with a Zero Harm and Safety Health Emergency Preparedness Program and a Workers' Health Protection Programme.

b) Under these programmes, Top Glove's factories have a designated First Aid Room equipped with cardiac emergency, immobilisation, and stabiliser and mobiliser equipment, which are facilities that go beyond the requirements set out by the Malaysia's Department of Occupational Safety & Health (DOSH), under the Ministry of Human Resources. The factories' First Responders and Safety Health Officers also work in tandem with a 24-hour emergency response team.

Rest assured that our company is committed to ensure that all the allegation are address and we do have social compliance audit every year to verify on our compliance.

Thanks and Best Regards,

(Ms.) **Fish** Koh Ee Ming
Executive, Marketing

Angie Ng Seow Ying (Ms.)
Manager, Marketing

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PRESS RELEASE

Top Glove Corporation Bhd (Company No. 199801018294 [474423 X])

For Immediate Release

TOP GLOVE COMMENCES REMEDIATION PAYMENT TO MIGRANT WORKERS & REMAINS COMMITTED TO CONTINUE IMPROVING WORKER WELFARE

Shah Alam, Monday, 10 August 2020 Top Glove is pleased to announce that it has today made the first remediation payment of RM4.4 million in respect of its migrant workers who joined the company prior to the implementation of its Zero Cost Recruitment Policy in January 2019.

The total remediation fee to be paid is estimated at RM53 million, subject to finalisation with the U.S. Customs and Border Protection (CBP).

At the same time, Top Glove continues to actively engage with the U.S. CBP towards resolving the Withhold Release Order (WRO) expeditiously.

Top Glove remains committed to worker welfare and will continue to work hard to upgrade its practices and initiatives in this area, which presently include the following:

1. Top Glove is the first glove manufacturer to invest in a Zero Harm and Safety Health Emergency Preparedness Program since 1 May 2019

- Over and above meeting requirements set out by the Department of Occupational Safety & Health (DOSH), Top Glove is the first glove manufacturing company that has invested in this comprehensive Zero Harm program, whereby:

- Factories have a designated First Aid Corner equipped with cardiac emergency, immobilisation, stabiliser and mobiliser equipment.
- The factories' First Responders and Safety Health Officers will work in tandem with a 24-hour emergency response team.

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2. Top Glove owns and operates a 24-hour in-house medical facility and ambulatory centre for the welfare & safety of its employees

- Top Glove has its own 24-hour medical facility, namely Top Glove Global Doctors Medical and Dental Clinic (TGGD), which also has a 24-hour emergency ambulance with trained paramedics.
- TGGD is staffed by 15 medical personnel and located at Top Glove's 23-storey Corporate Office which is just a 10-minute drive from Top Glove's Klang factories.

3. Top Glove is one of very few manufacturing companies with a dedicated team of 12 Wellness Professionals

- Top Glove has 12 full-time Wellness Professionals comprising 9 Nutritionists, 1 Naturopathy Wellness Consultant, 1 Food Service Executive and 1 Health Admin Executive.
- Top Glove is one of very few manufacturers to have such a sizeable team solely dedicated to looking after employee health and well-being.
- Our ongoing health-centric initiatives include free health screening for all employees and frequent health talks.

4. Decent & safe worker accommodation with proper facilities

- Top Glove ensures decent accommodation with proper facilities is provided to our workers.
- All accommodation is strategically located near a variety of eateries, while factory canteens operate 24 hours.
- Most of our worker accommodation also comes fitted with cooking facilities.
- At one of our newer hostels, 2 types of native cooking are available for the convenience of our workers. In addition, this hostel provides various amenities including a barber shop, prayer halls, mini market, Automatic Teller Machines (ATM), laundromat, money transmission operators and recreational areas.
- Furthermore, we are one of few private companies with our own ancillary police to ensure the safety of our people and premises.

5. Comprehensive worker healthcare benefits

- We have in place a Workers Health Protection Programme (WHPP), which is fully subsidised by the Company and entitles workers to free blood screening and basic vision and hearing assessments.

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- Complimentary/free dental care kits, which include a toothbrush, toothpaste, dental floss and tongue cleaner are also provided to all employees including workers.
- We provide workers with a healthy and balanced vegetarian diet.

6. Implemented COVID-19 Preventive Measures SOPs

- In light of the pandemic, Top Glove is also fully compliant with all COVID-19 preventive measures SOPs imposed by the Malaysian federal government and relevant authorities.
- Going above and beyond in terms of health and safety measures, we have in place an isolation hostel in the event any COVID-19 positive cases are discovered among our workers.
- We arranged for delivery of subsidised vegetarian lunch boxes for all employees to minimise movement and risk of exposure to COVID-19, while also ensuring our people have access to healthy and affordable meals. Workers pay just RM1 per meal. The response to this initiative has been very positive and we are considering continuing this even after the RMCO is fully lifted.

A testament to its excellent practices in human resource (HR) management, Top Glove also garnered several prestigious local and regional HR awards in October and November 2019 namely:

1. Graduates' Choice Award 2019: Champion (Manufacturing)
2. Malaysia's 100 Leading Graduate Employers 2019: Winner (Chemicals and Heavy Industries)
3. HR Asia's Best Companies to Work for In Asia 2019 (Malaysian Chapter): Winner
4. AIA Vitality Malaysia's Healthiest Workplace Award 2019: Highly Commended (Large Organisation)
5. HR Excellence Awards 2019: Bronze Winner for Excellence in Talent Management

We will continue to provide updates on developments.

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About Top Glove Corporation Bhd

Top Glove Corporation Bhd is listed on the Bursa Malaysia Stock Exchange Main Board and Singapore Exchange Mainboard. It is also one of the component stocks of the MSCI Global Standard Index, FTSE Bursa Malaysia KLCI Index, FBM Top 100 Index, FBM Emas Index, FBM Hijrah Syariah Index, FBM Emas Syariah Index, FTSE4Good Bursa Malaysia Index and the Dow Jones Sustainability Indices (DJSI) for Emerging Markets. Top Glove is currently the world's largest manufacturer of gloves with an established corporate culture and good business direction of producing consistently high quality, cost efficient gloves. Top Glove has over 2,000 customers worldwide and exports to more than 195 countries.

Summary of key information:

As at 10 August 2020

Number of Factories

45 factories (40 in Malaysia, 4 in Thailand, 1 in China) comprising:

- 34 glove factories
- 2 latex concentrate plants
- 3 chemical factories
- 1 glove former factory
- 2 packaging material factories
- 1 dental dam factory
- 1 condom factory
- 1 face mask factory

Number of Marketing Offices

6 (Malaysia, USA, Germany, Brazil, China and Thailand)

Number of Glove Production Lines

700

Glove Production Capacity

80.2 billion pieces per annum

Number of Employees

20,000

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PRESS RELEASE

Top Glove Corporation Bhd (Company No. 199801018294 [474423 X])

For Immediate Release

**TOP GLOVE CONTINUES TO MAKE GOOD PROGRESS
TOWARDS RESOLUTION OF U.S. CBP ORDER:**

VERIFICATION ON LABOUR PRACTICES BY INDEPENDENT CONSULTANT COMPLETED

Shah Alam, Friday, 28 August 2020 Top Glove is pleased to update that the independent consultant appointed to verify labour practices at its manufacturing facilities and accommodation, has completed the intended verification work.

The independent audit entails virtual interviews of about 1,100 of the company's migrant workers across various locations and also addresses the relevant areas of concern identified by the U.S. CBP. The audit report is expected to be available within 10 days, for onward submission to the U.S. Customs and Border Protection (CBP).

Top Glove had on August 10, 2020 commenced part remediation for recruitment fees amounting to RM4.4 million, to 9,204 of its migrant workers who joined the company prior to the implementation of its Zero Cost Recruitment Policy in January 2019. The total remediation fee to be paid is estimated at RM53 million, subject to finalisation with the U.S. Customs and Border Protection (CBP).

The company continues to enhance its migrant workers' working and living environment and facilities, to ensure their well-being is always well-cared for.

Top Glove is appreciative of U.S. CBP's good and active engagement and is committed to carrying through its remediation plans. The company looks forward to an expeditious upliftment of the Withhold Release Order.

Top Glove will provide updates on developments as they occur.

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Summary of key information:

As at 28 August 2020

Number of Factories

46 factories (41 in Malaysia, 4 in Thailand, 1 in China) comprising:

- 35 glove factories
- 2 latex concentrate plants
- 3 chemical factories
- 1 glove former factory
- 2 packaging material factories
- 1 dental dam factory
- 1 condom factory

- 1 face mask factory
- Number of Marketing Offices
6 (Malaysia, USA, Germany, Brazil, China and Thailand)
- Number of Glove Production Lines
722
- Glove Production Capacity
85.2 billion pieces per annum
- Number of Employees
20,000
- 1

PRESS RELEASE

Top Glove Corporation Bhd (Company No. 199801018294 [474423 X])

For Immediate Release

TOP GLOVE AFFIRMS COMMITMENT TO REMEDIATE MIGRANT WORKERS BASED ON AMOUNT RECOMMENDED BY INDEPENDENT CONSULTANT

Shah Alam, Tuesday, 6 October 2020 Top Glove is pleased to affirm its commitment to remediating its migrant workers with respect to recruitment fees previously paid by the migrant workers to agents or other parties.

The remediation will now be based on the revised sum of approximately RM136 million, in accordance with recommendations by the independent consultant, following the completion of the independent consultant's comprehensive verification work. Migrant workers will receive remediation over the next 10 months, from October 2020 onwards. Top Glove had earlier made the first 2 remediation payments in August and September 2020.

Top Glove has duly submitted the necessary information to the U.S CBP and is following up closely with them, with a view to an expeditious resolution of the matter and revocation of the WRO.

Top Glove will continue to provide updates on developments as they occur.

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PRESS STATEMENT

Top Glove Corporation Bhd(Company No. 199801018294 [474423-X])

For Immediate Release

Top Glove factories reopen with reinforced health and safety precautions

Top Glove implements more stringent SOPs to ensure health and safety of factory workers post EMCO

Shah Alam, Monday, 4 January 2021 As Top Glove Corporation Bhd (Top Glove) reopens its factories in Klang, Selangor, the Company is placing the well-being of its workforce as its top priority, with reinforced health and safety measures.

The health and safety measures being taken include daily disinfection of the entire premises, especially of common areas; sanitisation of internal areas conducted three times a day; temperature screening and availability of hand sanitisers and face masks for all employees and visitors at guardhouse; provision of disinfection floor mats at entrances to factories and offices; provision of hand sanitisers in all common areas; and provision of designated bins with lids for the safe disposal of used Personal Protective Equipment (PPE).

All Top Glove employees and visitors are also required to wear a mask while on the factory premises, and it is compulsory for cleaning personnel to don full PPE while conducting sanitisation and disinfection. Employees are also reminded to maintain a safe distance from others while at work and during their rest times, with clear social distancing markings. Top Glove has also put in place staggered break times for employees; employees are allocated specific time slots for breaks at designated areas to prevent overcrowding.

Since the relevant authorities gave us the green light to reopen the Stage 4 factories on 20 December 2020, all 28 factories in Meru, Klang have resumed operations with stricter adherence to SOPs, emphasising the health and safety of our workforce to ensure that our life-saving gloves reach those who need them most.

Top Glove wishes to assure our stakeholders that we are taking all steps towards ensuring stricter adherence to safety SOPs at our factories, offices, accommodations, and vehicles, and that we will remain vigilant in our efforts to ensure the safety and well-being of our employees and the communities we serve.

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Summary of key information: As at 4 January 2021

Number of Factories	47 factories (41 in Malaysia, 4 in Thailand, 1 in China and 1 in Vietnam) comprising: <ul style="list-style-type: none"> <input type="checkbox"/> 36 glove factories <input type="checkbox"/> 2 latex concentrate plants <input type="checkbox"/> 3 chemical factories <input type="checkbox"/> 1 glove former factory <input type="checkbox"/> 2 packaging material factories <input type="checkbox"/> 1 dental dam factory <input type="checkbox"/> 1 condom factory <input type="checkbox"/> 1 face mask factory
Number of Marketing Offices	7 (Malaysia, USA, Germany, Brazil, China, Thailand and Vietnam)
Number of Glove Production Lines	750
Glove Production Capacity	90 billion pieces per annum
Number of Employees	21,000