

Annual Report of Fighting Against Forced and Labor In Supply Chains Act

in accordance with the *Fighting Against Forced and Child Labor in Supply Chains Act*

By Devonian Health Group Inc.

Introduction

This report is produced by Devonian Health Group Inc. (“Devonian”) for the fiscal year ending July 31, 2023.

This is the first report prepared by Devonian in accordance with Canada’s new *Act for fighting against Forced Labor and Child Labor in Supply Chains* (the “Act”).

Reporting entities

This joint report also concerns the wholly owned subsidiary of Devonian:

Altius Healthcare (“Altius”), a corporation continued under the *Canadian Business Corporations Act*.

Structure, activities and supply chains

About Devonian

Devonian was incorporated in 2015 under the Quebec Business Corporations Act. Following an amalgamation that took place on May 12, 2017, between “Orletto Capital Inc. / *Capital Orletto Inc.*”, a capital pool company, and “Devonian Health Group Inc. / *Groupe Santé Devonian Inc.*”, a private company, which of Devonian is the resulting corporation, Devonian is now governed by Canadian Business Corporations Act. Its head office is located at 360, rue des entrepreneurs, Montmagny, Québec G5V 4T1, where it has pharmaceutical facility with full traceability.

Devonian is a late-stage botanical biopharmaceutical company employing an innovative strategy targeting unmet medical needs. Devonian's primary strategy is to develop botanically derived prescription drugs for the treatment of inflammatory autoimmune diseases including, but not limited to, ulcerative colitis and atopic dermatitis. Built on a foundation of 15 years of research, Devonian's goal is also supported by regulatory guidelines from the U.S. Food and Drug Administration (FDA), promoting a more efficient development process for prescription botanical drug products. than that of traditional prescription drugs.

Devonian is also involved in the development of high-value cosmeceutical products leveraging the same proprietary approach used with their pharmaceutical offerings.

Devonian's subordinate voting shares are listed on the TSX Venture Exchange (TSXV: GSD) and the OTCQ Venture Exchange (OTCQB: DVHGF).

About Altius

Devonian owns all of the issued and outstanding shares of Altius, a generic pharmaceutical distribution company, primarily engaged in the acquisition and licensing of drugs and healthcare products, safe and innovative prescription health products designed to help people of all ages lead healthier lives. Altius then leverages its expertise in the commercialization activities required to successfully launch and distribute these drugs in Canada.

Altius' current portfolio includes three pharmaceutical drugs: Pantoprazole Magnesium, Cleo-35 and Dexlansoprazole.

About our supply chain

Devonian relies on a variety of suppliers and service providers to conduct its research and development activities and distribute human health products. We procure goods and services from several suppliers, primarily in North America.

Here are some examples of the main types of suppliers and service providers:

- Excipient suppliers

Excipients are non-active ingredients that are used as fillers, binders or stabilizers in the preparation of our medicines and cosmeceutical products. Our excipient suppliers provide these ingredients.

- Raw material suppliers

These suppliers supply us with ingredients and raw materials that are essential to the manufacturing of our medicines, such as organic baby spinach, sugars, solvents and other chemicals.

- Packaging suppliers

Packaging suppliers provide packaging materials and services. They provide items like bottles, jars, vials, labels and other packaging materials.

- Contract Manufacturing Organizations

Contract manufacturing organizations specialize in the manufacturing and production of pharmaceutical and cosmeceutical products. They provide services like preparing our creams.

- Research organizations

We often collaborate with research centers, academic organizations and contract research organizations. These partners participate in research and development as well as clinical studies on new drugs.

- Equipment suppliers

We use suppliers of specialized equipment used in the manufacturing of pharmaceutical products as well as for our extraction activities, such as mixing systems, laboratory equipments.

- Quality control service providers

These entities provide analytical testing and quality control and assurance services to ensure that our products meet regulatory requirements and comply with quality standards established through our Research and Development projects.

- Suppliers of generic pharmaceutical products

Devonian sources its supplies from large pharmaceutical companies to distribute generic pharmaceutical products to wholesalers and pharmacies in Canada. This involves working with global suppliers and manufacturers, as well as regulatory authorities, to ensure a safe and reliable supply of medicines to consumers across Canada.

- Logistics and distribution service providers

We use logistics and distribution service providers to ensure the transportation and distribution of finished products in different markets and to various customers as well as the warehousing of these products.

Policies and Processes

With respect to forced labor and child labor, as defined by the International Labor Organization and the Law.

Child labor

We do not use child labor. The hiring of young workers under the age of 18 should only occur for safe tasks and if the young workers are above the legal hiring age.

Forced labor

We do not use forced labor, debt bondage, long-term indentured labor, or involuntary prison labor, and we do not engage in human trafficking or any other form of modern slavery. No worker is required to pay for employment or is deprived of freedom of movement.

Risk of forced labor and child labor.

Our activities

In our own operations, we believe the risk of forced labor and child labor is minimal. Our business activities do not in any way involve child labor or the use of vulnerable labor. Given the level of regulation of the pharmaceutical sector in which we operate, it is not recognized as a sector where the risk of forced labor and the risk of child labor is significant.

Our supply chain

The risk of forced labor and child labor in our supply chain is linked to our choice of suppliers who operate in countries where these risks may be high.

Although the risk of forced and child labor in the pharmaceutical industry is relatively low, given its high level of regulations, we recognize that it can still be present in some countries.

Fighting the risks of forced labor and child labor

Our activities

We have updated our whistleblowing policy, so that identified wrongdoing, whatever its nature, is reported through a well-established communication channel.

We exercise diligence when hiring our staff to ensure compliance with Devonian's values.

Our supply chain

Among the measures taken during the fiscal year ended July 31, 2024, to counter the risks of forced labor and child labor in the context of our activities, we have demonstrated additional diligence in the choice of our suppliers by trying to ensure that they respect a code of conduct according to our standards and values.

Remediation Measures

During the fiscal year ended July 31, 2024, we have not identified any cases of forced labor or child labor in our operations and in our supply chain. Therefore, no corrective measures had to be put in place.

Should Devonian identify instances of forced labor and child labor, it is committed to developing and implementing appropriate corrective measures to remedy the situation.

APPROVAL AND ATTESTATION PURSUANT TO THE *FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY ACAINS ACT*, S.C. 2023, C.-9 (the "Act")

This annual report has been approved by the board of directors of Devonian Health Group Inc. and of Altius Healthcare Inc. in accordance with paragraph 11(4) (a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, certify that I have reviewed the information contained in this report for the entity listed above. To the best of my knowledge, and after having exercised reasonable diligence, I confirm that the information contained in this report is true and complete in all material respects for the purposes of the Act, for the fiscal year ended July 31, 2024, covered by the above-mentioned declaration.

Luc Grégoire

President and Chief Executive Officer of
Devonian Health Group Inc.

I have the authority to bind Devonian Health Group Inc.

Pierre Montanaro

President of Altius Healthcare Inc.

I have the authority to bind AltiusHealthcare Inc.