1311519 Alberta Limited
Alldritt Management Limited
Alldritt Homes Ltd.
Stafford Greens Ltd.
Fairfax Lane Development Ltd.
Cottages at Central Park Ltd.
Panache on 12th Developments Ltd.

# ANNUAL REPORT ON FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

For the year ended March 31, 2024

#### HISTORY

The entities are primarily involved in the construction and sale of residential housing.

### CORPORATE STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

This annual report on forced labour and child labour in supply chains (the "Report") is a joint report by 1311519 Alberta Ltd. on behalf of its subsidiaries below in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains (the "Act"). All information in the Report is at March 31, 2024.

This reporting entities include:

- 1. 1311519 Alberta Ltd.;
- 2. Alldritt Management Limited;
- 3. Alldritt Homes Ltd.;
- 4. Stafford Greens Ltd.:
- 5. Fairfax Lanes Development Ltd.;
- 6. The Cottages at Central Park Ltd.;
- 7. Panache on Twelfth Ltd.

The entities include two (2) holding companies, and five (5) companies which are primarily involved in the construction and sale of residential housing in Edmonton, Alberta.

Activities conducted by these companies include selling goods in Canada or controlling an entity engaged in producing, selling or distributing goods in Canada.

The entities are currently inactive. The entities are not directly or indirectly involved in perpetrating or participating with any businesses that utilize forced labour or child labour in their supply chain.

#### **POLICIES**

When the entities resume operations, it will incorporate responsible business conduct in its operations, policies and procedures. The entities will consider business practices and conduct of suppliers before we contract to commence a business relationship with them. The entities will monitor the business conduct of our suppliers.

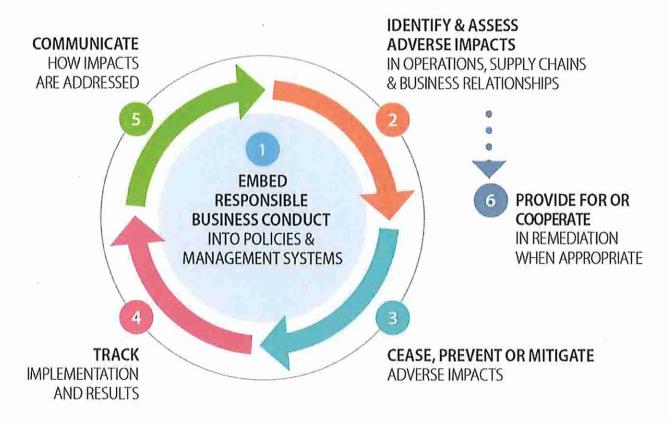
#### CHARACTERISTICS OF DUE DILIGENCE

The entities will utilize the following approach to due diligence with respect to forced labour and child labour.

The following are excerpts from the OECD (Organization for Economic Co-Operation and Development) "Due Diligence Guidance For Responsible Business Conduct" (2018), and the wording has been adjusted as applicable.

- Due diligence is preventative The purpose of due diligence as it relates to forced labour and child labour is to avoid causing or contributing to adverse impacts on society, and the environment, and to try to prevent impacts to operations, products and services.
- Due diligence involves multiple processes and objectives The concept of due diligence
  under the OECD Guidelines involves interrelated processes to identify potential impacts,
  prevent and mitigate impacts, track implementation and results and communicate on how
  adverse impacts are addressed with respect to an enterprises' own operations, their
  supply chains and other business relationships.
- Due diligence is commensurate with risk (risk-based) The measures undertaken to conduct due diligence should be commensurate to the severity and likelihood of the adverse impact.
- Due diligence can involve prioritisation (risk-based) An enterprise should prioritise based on the magnitude and likelihood of the impact. The process of prioritisation is ongoing, and new or emerging impacts may arise and be prioritised before moving on to less significant impacts.
- Due diligence does not shift responsibilities Each enterprise in a business relationship has its own responsibility to identify and address adverse impacts.
- Due diligence is appropriate to an enterprise's circumstances The nature and extent of due diligence can be affected by factors such as the size of the enterprise, the context of its operations, its position in supply chains, and the nature of its products or services.
- Due diligence can be adapted to deal with the limitations of working within business relationships - Enterprises may face practical and legal limitations to how they can influence or affect business relationships to cease, prevent or mitigate adverse impacts on responsible business conduct issues or remedy them. Enterprises may not have the market presence or power to influence their business relationships.

#### DUE DILIGENCE PROCESS AND SUPPORTING MEASURES



Excerpt is from the OECD "Due Diligence Guidance for Responsible Business Conduct" (2018)

#### MEASURES TAKEN TO REMEDIATE

As the entities were inactive, no action was required to remediate any forced labour or child labour.

## STEPS TAKEN TO PREVENT OR REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR IN THE PREVIOUS FISCAL YEAR

The entities do not manufacture products or directly import products into Canada. When operations resume, the entities will develop policies and procedures designed to monitor their suppliers for responsible business conduct.

#### **TRAINING**

As the entities were inactive, no training was required. When operations resume, the entities will develop training programs for employees who purchase goods and services for the Company to reduce the risk of purchases from suppliers who do not follow responsible business conduct.

#### ASSESSING THE EFFECTIVENESS OF OUR PROCEDURES

As the entities were inactive, there was no requirement to assess the effectiveness of their procedures.

#### **ATTESTATION**

This report is for 1311519 Alberta Ltd., Alldritt Management Limited, Alldritt Homes Ltd., Stafford Greens Ltd., Fairfax Lanes Development Ltd., The Cottages at Central Park Ltd. and Panache on Twelfth Ltd. as a single reporting unit.

In accordance with the requirements of the Act, I attest that I have charged those responsible for governance and control of the entities to have reviewed the information contained in this report. Based on their knowledge, and their 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.

I, Stanley Alldritt, Director, have the authority to bind 1311519 Alberta Ltd. and its subsidiaries.

May 28, 2024