

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: A&S Construction Ltd

Contact person and their position: Darran Love, Controller

Address of the supplier: 300-900 Lorimer Blvd, Winnipeg, MB R3P 2V4

Nature of business: Home Builder

Number of years in operation: more than 45 years

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

See attached

How do you ensure transparency and traceability throughout your supply chain?

Only deal with established, professional suppliers/subs that comply with Canadian regulations. Companies that comply with code of conduct and to ensure all transparency and traceability through relationships with them.

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

No, we expect all suppliers to comply with their federal and provincial labour standards and conduct internal audits

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

Yes, they must adhere to all labour standards, codes of conduct and all Canadian labour laws as we do

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

YES

How do you ensure that your employees and those of your subcontractors are of legal working age?

We follow all labour laws for both staff and subcontractors, all manufacturers must follow

Canadian employment standards and regulations

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Education and workshops, make it known and understood there is zero tolerance including

job sites

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

We comply and follow all labour standard codes of conduct set out by governments

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

YES

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

Routine assessments with employees, subcontractors and manufacturers to confirm these regulations are being followed

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

NO

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

NO

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

We are committed to providing a safe work environment, harassment free for all employees and enforce it

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

Zero tolerance policies are in place for all working environments including job sites and manufactures spaces

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

Yes, we will cooperate fully at all times on behalf of our organization

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

More training and education for all staff to further enhance transparency and compliance with labour standards in addition, ethical business practices on codes of conduct, violations in regards to labour laws and rights

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

We will continue to educate ourselves and work with others in the industry to ensure we are aware of any and all information that can help us in this area

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

We are in the process of evaluating all requirements to Bill-S-211 at this point we have assessed our risk based on information provided to us and deemed it to be low. In addition we continue to work with all Canadian regulations.

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

Upon request

Subcontractor and Suppliers Involved in Goods or Services

6P Marketing
All Weather Windows
All-Fab Building Components
City Mix
Cloverdale Paint
Creative Door
Curtis Carpets
Fort Rouge Glass
Furnaceman
Heat Saver Distributors
Home Depot Canada
IXL Masonry
Kitchen Craft Canada
Matix Lumber
Mid-Canada Reinforcing
Plumb X
Ply Gem Canada
Robinson Lighting
RONA Canada
Shodor Industries
SI Alarms
South Central Building
Southern Comfort
Southside Electric
Springfield Woodworking
Springhill Lumber
Stone and Counters
The Brick
Tiberstone Distribution
Truss Fab
Ultimate Flooring
Univrsal Drywall

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: All-Fab Building Components LP

Contact person and their position: Michael Freear, Senior Purchaser - 2024/05/30.

Address of the supplier: 1601 Regent Ave. West, Unit 200, Winnipeg, Manitoba, R2C 3B3

Nature of business: Supplier of building components, structures, and materials

Number of years in operation: 54 Years

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

We are currently in the process of vetting over 250 current vendors the majority are based in Canada and the United States. We have a new vendor information form that ensures vendors are compliant before we add them to our active vendor file.

How do you ensure transparency and traceability throughout your supply chain?

We have added a flag to our ERP software to allow our purchasers to see fully vetted vendors. Vendors that do not comply will be made inactive until they do comply. Our goal is to have all active vendors vetted by year-end.

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

Not currently, we are looking to engage a third party to supply out-of-compliance vendors. once in place, we will have a process to work with vendors to ensure they are compliant, if this is unachievable, we will cease to use non-compliant vendors.

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

Yes, they are as it is part of our policy. This will be rolled out in June 2024, and this will fall under our vendor vetting process.

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

Yes.

How do you ensure that your employees and those of your subcontractors are of legal working age?

Our employees must supply government-issued ID.

For contractors, this will be part of our vetting process.

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Our employees, this is laid out in our Manuals and policies.

For contractors, this will be part of our vetting process.

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

Yes.

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

We are waiting on board approval of our policy, once in place we will roll out our training.

Our expectation is to have the training of employees completed by the end of July 2024.

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

We will engage a third-party reporting organization that will monitor our vendors and
inform us of all out-of-compliance activities.

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

No.

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

Not currently.

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

We have a policy that lays out the process for addressing all aspects of reporting and
grievances.

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

We are currently in the process of creating a process for vendors that do not comply, that
aligns to our zero-tolerance approach.

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

Yes, we are, as this is part of our goal as well.

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

As part of AFG's position statement against modern slavery and human trafficking, we will
apply a continuous improvement process to make sure our company is compliant in all areas of the
act.

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

We will vet all new vendors to ensure they are compliant business partners to the All Fab
Group.

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

We will provide our Position statement and policy once they are board approved.

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

Not currently.

Subcontractor and Suppliers Involved in Goods or Services

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. **General Information:**

- Name of the supplier: Curtis Carpets
- Contact person and their position: Stephanie Curtis Manager
- Address of the supplier: 1280 Pembina Hwy Winnipeg Man, R3T2B2
- Nature of business: Flooring
- Number of years in operation: 40 plus

2. **Supply Chain Transparency:**

- Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.
see attached

- How do you ensure transparency and traceability throughout your supply chain?
only deal with established, professional suppliers/subs that comply with canadian regulations
must comply with code of conduct and to ensure all transparency and traceability though relationships with them

- Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.
no we expect all suppliers to comply with their federal and provicial labour standards and conduct internal audits

- Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.
Yes they must adhere to all labor standards, codes of conduct and all Canadian labor laws as we do

3. **Labour Practices:**

- Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

yes

- How do you ensure that your employees and those of your subcontractors are of legal working age?

we follow all labor laws for both staff and subcontractors , all manufactures must follow Canadian employment standards and regulations

- What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

education and workshops, make it known and understood there is zero tolerance including all job sites

- Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

we comply with all labor standard codes of conduct set out by governments, we follow all policeies

- Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

yes

4. **Monitoring and Compliance:**

- How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

routine assessments with employees, subcontractors and manufactures to confirm these regulation are being followed

- Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

no

- Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

no

5. **Reporting and Remediation:**

- What processes do you have in place for reporting and addressing grievances related to labour rights violations?

we are committed to providing a safe work environment, harassment free for all employees and enforce it

- How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

zero tolerance policies are in place for all working environments including job sites and manufactures spaces

- Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

yes, we will cooperate fully at all times on behalf of our organization

6. **Future Commitments:**

- What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

more training and education for all staff to further enhance transparency and compliance with labor standards

and ethical business practices on codes of conduct, violations in regards to labor laws and rights

- Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

will continue to educate ourselves and working with others in the industry to ensure we are aware of any and all

information that can help us in this area

7. Documentation and References:

- Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

we are in the process of evaluating all requirements to Bill-S-211 at this point we have assessed our risk based on information provided to us and deemed it to be low, continue to work with Canadian regulations

- Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?
upon request

<u>SUPPLIER</u>	<u>ADDRESS</u>	<u>PROVINCE</u>	<u>POSTAL CODE</u>
BEAULIEU CANADA COMPANY	335 RUE ROXTON	QC	J0H 1A0
BUCKWOLD WESTERN LTD	70 3239 FAITHFULL AVENUE	SK	S7K 8H4
SHAW INDUSTRIES - T9655	LOCKBOX 917040 181 BAY STREET 5TH FLOOR	ON	M5J 2V8
CERATEC INC	414, AV SAINT-SACREMENT	QC	G1N 3Y3
AMES TILE & STONE	11603 - 180 STREET	AB	T5S 2H6
CONGOLEUM	PO BOX 931905	GA	31195
MANNINGTON COMMERCIAL	P.O. BOX 12281, 1844 US HWY 41 S.	GA	30703-7004
PROSOL INC	UNIT 2 - 167 HUTCHINGS ST	MB	R2X 2R4
FISC	1535 BURROWS AVE	MB	R2X 3B5
MIRAGE	H-844 MCLEOD AVE	MB	R2G 2T7
TREECO	11641-163 STREET	AB	T5M 3W6
FUZION FLOORING	6745 FINANCIAL DRIVE	ON	L5N 7J7
ENGINEERED FLOORS LLC	PO BOX 4090 STN A	ON	M5W 0E9
TORLYS INC	1900 DERRY ROAD EAST	ON	L5S 1Y6
METROPOLITAN HARDWOOD FLOORS, INC	811 CLIVEDEN AVENUE, ANNACIS ISLAND	BC	V3M 5R6
PRIMCO LIMITED	12300 - 44TH STREET SE	AB	T2Z 4A2
JULIAN CERAMIC TILE	10-885 KEEWATIN STREET	MB	R2X 0S7
MOHAWK FACTORING, INC	P O BOX 57407, STATION A	ON	M5W 5M5
XL FLOORING	1918 POWELL ST	BC	V5L 1J3
BECKHAM BROTHERS	351 ELEANOR STREET	ON	N5W 6B7

Name*

BUTTAZONI, JAMES (JIM)
A & W FLOORING
ANDERSON, DOUG
APOLLO FLOORING LTD
ARC FLOORING
ARNAL, GUY
BLACKSTONE TILE
BMM CONTRACTING INC, (BARRIE MAGUIRE)
BRAVO BUILDERS LTD
CAPSTONE FLOORING INC, CAPSTONE FLOORING INC
CARON, DEREK
CJ'S FLOOR DESIGNS
CLIFF THOMAS FLOORING INSTALLATIONS INC,
DEVEAUTION TILING, DEVEAUTION TILING
DIAMOND DAVE FLOORING INC
DONE RIGHT FLOORING
DOUNYA FLOORING INC
DUFF, KEITH
EINARSSON, TROY (TROY EINARSSON)
FARREND, BRIAN (BRIAN FARREND)
FINNEY, ROBERT
FLOOR ESSENCE, (WES KRAHN)
FLOORED BY JESSE JAMES,(JESSE GAGNON)
FTF DESIGNS LTD (FRANK THERON)
GARY ZELLER FLOORING INSTALLATIONS
GRUNINGER, KEVIN
HARDING, TED (TED HARDING)
INSTALLER DIRECT FLOORING (RAY COMTE)
J & R TILE INC
J.L.V ENTERPRISES INC
JARVIS CONTRACTING, JARVIS CONTRACTING
JOEL'S FLOORING SOLUTIONS
KARL, GORDON (GORD)
LAFERRIERE, DAVID (DAVID LAFERRIERE)
LOCONTE TILE, LOCONTE TILE (VIC LOCONTE)
LUCEK, DION
M2 FLOORING
MAGUIRE, TIM
MARKO, JAMES
MARTENS, DANIEL
MARTINEZ, ARTURO
MICK'S TILING
MILO ENTERPRISES, (VOYTEK GAUDYNEK)
MOONEY, BILL (BILL MOONEY CONSTRUCTION & REPAIR LTD)
OLIM ENTERPRISES, (PIOTR GAUDYNEK)
PC INSTALLATIONS
RCL FLOORING, RCL FLOORING
REALCO FLOORING LTD
RENAUD, MICHAEL (MICHAEL RENAUD)
ROBERTS, ROBERT (ROBERT)
S'ALL GOOD FLOORING,(DOUG RYAN)
SH CONSTRUCTION & RENOVATION
SKRYPNIKOV, SERGEY
STANEK JR, ARTHUR
STANEK, ARTUR
SUNRISE FLOORING INC
SWERDELIAN, JOHN (JOHN SWERDELIAN)
THESJO TILING
UNICO FLOORING
VCT LIMITED, VCT LIMITED (VCT LIMITED)
WIENS TILE & STONE

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: FORT ROUGE GLASS

Contact person and their position: BRENDAN BERNTT OR MICHAEL MESSERVEY

Address of the supplier: 58 SOUTH LANDING DRIVE, OAK BLUFF, MB R4G 0C4

Nature of business: GLAZING SUPPLIER/CONTRACTOR

Number of years in operation: 56 YEARS

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

We deal with many companies within North America who do follow the laws set forth by their governments and to our knowledge there is no modern slavery happening within these companies. The supplier names and information is proprietary to our organization.

How do you ensure transparency and traceability throughout your supply chain?

N/A

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

NO

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

Canadian and American Laws for labour standards.

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

In our organization all employees are voluntarily employed. To our knowledge so are the employees within our supply chain.

How do you ensure that your employees and those of your subcontractors are of legal working age?

For our employees we verify ID. We do not typically use subs.

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

within our organization we have safety policy which covers harassment & abuse

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

we follow Canadian labour standards set forth by the government of Canada. Member of COR, and all employees make above minimum standards.

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

N/A

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

We do not monitor our supply chains.

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

NO!

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

Management has extensive experience with Labor laws and ethical business practices.

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

Never had any grievances as we strictly follow labor law. We have incidence reports in place for employees

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

Never had any labor rights violations. Incidents would be investigated by management and corrective action taken immediate

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

Yes

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance

with labour standards and ethical business practices in the future?

Continual monitoring by management to ensure no labor standards or ethical practices are broken

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

No additional measures as there is nothing in our organization or supply chains that we are aware of that necessitate further measures.

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

N/A - Refer to Manitoba and Federal labor laws and business practices.

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

No, as this isn't something we have ever had to deal with as we do not participate in any modern slavery.

Subcontractor and Suppliers Involved in Goods or Services

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

- Name of the supplier: _____
- Contact person and their position: _____
- Address of the supplier: _____
- Nature of business: _____
- Number of years in operation: _____

2. Supply Chain Transparency:

- Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

- How do you ensure transparency and traceability throughout your supply chain?

- Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

- Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

3. Labour Practices:

- Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

- How do you ensure that your employees and those of your subcontractors are of legal working age?

- What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

- Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

- Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

4. Monitoring and Compliance:

- How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

- Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

- Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

5. **Reporting and Remediation:**

- What processes do you have in place for reporting and addressing grievances related to labour rights violations?

- How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

- Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

6. **Future Commitments:**

- What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

- Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

7. **Documentation and References:**

- Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

- Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?



2023 Responsible Sourcing Report



THE HOME DEPOT®

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Unless otherwise noted, all data included in this report is for the fiscal year ended January 29, 2023.



Letter from Our Chair, President and CEO

“

Our values define who we are, and how we operate.

More than 40 years ago, our founders gave us an incredible gift of eight core values. These values aren't just something we post in our lobby; they are our North Star and guide our decisions.

Although a majority of our products are sourced in North America, The Home Depot works with thousands of suppliers and factories around the world to source merchandise for our customers. Through our Responsible Sourcing Program, we strive to ensure our values direct each step of the supply chain to make a positive impact. It's incredibly important to us that the people who create what we sell are treated with respect in a safe and fair workplace, and that our suppliers benefit from Doing the Right Thing. Ultimately, we want our customers to receive quality products that have been sourced responsibly.

Our outstanding associates and suppliers continue to make social and environmental responsibility a top priority, and I want to thank them for their hard work and the many ways they bring our values to life each and every day.

”

Ted Decker

Ted Decker
Chair, President and CEO



Responsible Sourcing Program



The Home Depot Human Rights Program

Our values of Doing the Right Thing, Respect for All People and Taking Care of Our People are at the center of our Human Rights Program. The Home Depot and our affiliates, divisions and subsidiaries respect and support the dignity, well-being and human rights of our associates, the workers in our extended supply chain, the communities in which we live and those affected by our operations.

The Home Depot is committed to respecting internationally recognized human rights. We review and are informed by the United Nations (UN) Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We recognize that while governments have a duty to protect human rights, companies also have a responsibility to respect human rights. This means addressing the adverse impacts of our global operations.

We believe respecting human rights is of growing importance to our associates, workers, shareholders, investors, customers, consumers and the communities where we operate. There is both a business and moral case for working to ensure that human rights are upheld across our supply chain.

Through contractual arrangements and our Responsible Sourcing Program, we require our suppliers to acknowledge and abide by our human rights expectations. Our suppliers must agree to our Responsible Sourcing requirements as a condition of doing business with The Home Depot.

There is both a business and moral case for working to ensure that human rights are upheld across our supply chain.





Our Commitments

The Home Depot and its affiliates, divisions and subsidiaries strive to conduct business in a responsible manner. As we expand our business activities and work with suppliers domestically and globally to meet customers' needs, it is important to maintain our collective commitment to human rights and safety in the workplace.

The Home Depot expects that all suppliers will abide by all applicable international and local laws, rules, and regulations in the manufacture and distribution of merchandise or services provided to The Home Depot. Our suppliers are also contractually required to comply with The Home Depot's Responsible Sourcing Standards, and are strongly encouraged to exceed those standards and promote continuous improvement throughout their operations. Our suppliers must be able to demonstrate compliance with these requirements at the request of The Home Depot.

Our Responsible Sourcing Standards establish the requirements that our suppliers must meet in order to conduct business with The Home Depot.

Respecting and Supporting Our Supply Chain Starts at the Top



Board and/or Committee of the Board

Provides general oversight; receives annual progress report on and reviews results of the annual internal audit of the Responsible Sourcing Program



Executive Leadership Team

Our Executive Leadership Team sets the tone for our ethical standards and provides oversight and guidance, as needed



Management

Management is responsible for owning and managing risks and implementing actions to ensure Responsible Sourcing objectives



The Home Depot Global Sourcing Offices

Staff from our six global sourcing offices play a vital role in working with our supply chain to ensure compliance with our standards



The Home Depot Responsible Sourcing Team

The Home Depot has dedicated associates focused on ensuring factories adhere to our standards



Third-Party Auditors

We use established third-party audit firms to conduct our Responsible Sourcing Compliance Audits



Internal Audit

Internal audit associates conduct annual audits to ensure our Responsible Sourcing Program is effective and operating as expected

Responsible Sourcing Standards

Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate.

Child Labor

Suppliers must not employ workers younger than the greater of 15 years of age – or 14 where the local law allows such exception consistent with International Labour Organization guidelines – or the age for completing compulsory education or the minimum age established by law in the country of manufacture.

In addition, suppliers must comply with all local legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages and working conditions.

Forced Labor

Suppliers must not use forced, bonded (including debt bondage) or indentured labor, or prison labor, nor shall suppliers participate in slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. We also expect each vendor will conduct the due diligence necessary to ensure that all raw materials, components, and finished products come from sources that also meet this standard.

There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.

As part of the hiring process, workers must be provided with all documents relevant to their employment in a language they understand with a description of terms and conditions of employment prior to the worker departing from his or her country of origin, and there shall be no substitution or change(s) allowed in such documentation upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

All work must be voluntary, and workers shall be free to terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.

Foreign migrant factory workers should not be required to pay employers' or agents' recruitment fees or other related fees for the purpose of being hired or as a condition of employment.

Harassment and Abuse

Suppliers must treat all workers with respect and dignity. No worker shall be subject to corporal punishment or physical, sexual, psychological, or verbal harassment or abuse. In addition, suppliers will not use monetary fines as a disciplinary practice.

Compensation

Suppliers must meet or exceed the minimum wage and compensation requirements as defined under applicable labor laws, applicable agreements and local regulations for regular work, overtime work, production rates, and other elements of compensation and employee benefits.

Hours of Work

Suppliers must ensure that, except in extraordinary business circumstances, on a regularly scheduled basis, workers shall not be required to work more than the lesser of (a) sixty (60) hours per week, including overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture. In addition, except in extraordinary business circumstances, all workers shall be entitled to at least one day off in every consecutive seven-day period.

Non-Discrimination

Suppliers will ensure employment – including hiring, salary, benefits, advancement, discipline, termination, retirement, or any other terms and conditions of employment – should be based solely on the person's ability to perform the job requirements and not the person's beliefs or any other personal characteristics.

Freedom of Association and Collective Bargaining

Suppliers must recognize and respect the rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers must also respect the legal right of workers to bargain collectively.

Health and Safety

Suppliers must provide a safe and healthy working environment in accordance with applicable laws and regulations.

Environment

Suppliers must comply with all local environmental laws and regulations applicable to the workplace. Factories must conduct business in a manner which minimizes their impact on the environment.

Subcontracting

Suppliers must not use subcontractors in the manufacture of products or product components for The Home Depot without disclosing such information to The Home Depot, and only after the subcontractor has adequately demonstrated compliance with these Responsible Sourcing Standards.

Communication

Suppliers must communicate the provisions of The Home Depot Responsible Sourcing Standards to all workers and supervisors.

Business Ethics

Suppliers will conduct business with The Home Depot consistent with honesty and integrity and demonstrate the highest standards of business ethics. Suppliers will take no actions directed at improperly impacting the results of any audit including presentation of falsified records or coaching of employees. Consistent with The Home Depot Gift and Entertainment policy, suppliers will not offer any incentives to The Home Depot's associates or audit firm representatives.

Monitoring and Compliance

The Home Depot will undertake affirmative measures, such as announced and unannounced on-site audits of production factories, to monitor compliance with these Responsible Sourcing Standards. Suppliers must maintain on site all documentation necessary to demonstrate compliance with the Responsible Sourcing Standards, and suppliers must allow associates and/or representatives from The Home Depot full access to production facilities, worker records, production records and workers for confidential interviews in connection with monitoring visits.

Suppliers are expected to take necessary corrective actions to promptly remediate any noncompliance. Suppliers are expected to actively engage in remediation – including timely preparation and presentation of a Corrective and Preventive Action (CAPA) plan. The Home Depot reserves the right to terminate its business relationship with any supplier who is unwilling to comply with these Responsible Sourcing Standards.



Forced Labor Initiatives

Our Responsible Sourcing Standards are reviewed and updated periodically as we assess the risks faced in our supply chain and determine how to manage those risks. We use a risk-based approach to assess and manage the many aspects of our supply chain oversight and support our efforts to conduct our business in a responsible and ethical manner. Part of this approach is monitoring current trends in the domestic and international labor markets to identify growing risk areas in our supply chain, and updating our standards and audit practices based on those trends.

In early 2019, we updated and expanded our standards with respect to forced labor to better align with standard global practices. We revised our standards to more specifically address practices that can create an environment where labor is forced, even if it appears voluntary on its face. We now provide specific requirements regarding worker's freedom of movement, supplier hiring practices, a worker's ability to terminate employment, access to identity or immigration documents, and payment of recruiting fees. In early 2021, we also updated these standards to prohibit all prison labor, removing the provision that previously permitted voluntary prison labor. Our forced labor standards are based on the code of conduct provided by the Responsible Business Alliance (RBA), the world's largest industry coalition dedicated to corporate social responsibility in global supply chains.



About RBA

- World's largest industry coalition dedicated to corporate social responsibility in global supply chains.
- Members, suppliers, and stakeholders collaborate to improve working and environmental conditions and business performance through leading standards and practices.

In early 2019, we also joined the RBA's Responsible Labor Initiative, a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted. As a member of the Responsible Labor Initiative, we have access to best practices, tools, partnerships and other resources to better enable us to understand emerging issues, enhance our forced labor due diligence program and assist us in meeting regulatory requirements. These actions enhance and reinforce our oversight program, which includes factory audits that are focused on the areas that we believe pose the greatest risk.

Further, in late 2021, we started taking additional steps to reinforce the forced labor compliance aspects of Home Depot's Responsible Sourcing Program and to help us ensure the product we sell is free from forced labor and compliant with all applicable regulations. We created a cross-functional, advisory Forced Labor Working Group to oversee our forced labor compliance strategy. As part of that strategy, we work closely with our suppliers to conduct risk-based mapping and tracing of our supply chains and to improve supply chain visibility. We also continuously monitor external reports and regulatory developments to stay abreast of geographic-, entity-, and product-specific risks related to forced labor and to proactively identify and address specific risks that may exist in our supply chain. We hold suppliers accountable with expanded contractual requirements, certifications and audits; increased communications and training; and enhanced due diligence on high-risk supply chains requiring timely mitigation of any identified forced labor risk. We also conduct ongoing screening of our suppliers against sanctioned and listed entities.

We believe the actions we have taken to address the use of forced labor in the manufacture of products that we sell are appropriate and use a reasonable, risk-based approach to address this aspect of supply chain oversight.

Collaborations

Retail Ethical Sourcing Assessment (RESA)



The Home Depot believes in ensuring our factories meet our requirements. We recognize that many of our partners receive Responsible Sourcing audits from many other retailers throughout the year.

In 2017, The Home Depot and Lowe's worked collaboratively to establish and implement a unified audit template for both companies. The goal of this Retail Ethical Sourcing Assessment (RESA) is to avoid duplication of audits where The Home Depot and Lowe's are utilizing the same factories. We encourage other retailers to join us in reducing "audit fatigue" by utilizing RESA. RESA's collaborative approach allows for audit resources to shift and enables our Responsible Sourcing team and factories to dedicate those saved resources to further focus on improvement and compliance-related activities.

In addition to the RESA collaboration, there were 1,283 shared audits between THD and Lowe's from 2017 – 2022.

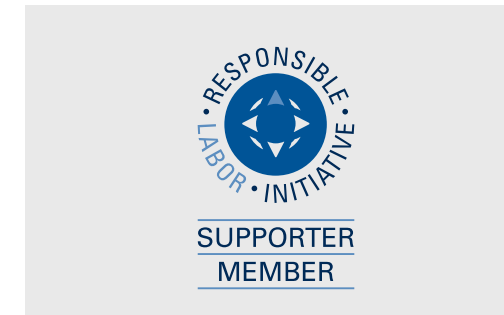
Association of Professional Social Compliance Auditors (APSCA)



Social Compliance Auditing plays a vital role in enabling brands, retailers, producers, and other partners to assess and work towards improvement in labor conditions, including human rights and social issues throughout supply chains. APSCA aims to increase the value and effectiveness of independent social compliance audits by enhancing the professionalism and credibility of individuals and organizations performing them.

All APSCA members are required to sign and abide by a Code of Professional Conduct, which defines their commitments and the responsibilities to which they must adhere and will be held accountable. As a member of the stakeholder board, The Home Depot participates in supporting the development of the program. In addition, we also require all of our third-party audit partners to be members of APSCA.

Responsible Labor Initiative (RLI)



The Home Depot is a supporting member of the Responsible Business Alliance's Responsible Labor Initiative. The RLI is a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted. In 2022, The Home Depot was added to the RLI Steering Committee which is a governance body that consists of 13 voting positions. The Steering Committee is responsible for the strategic guidance and direction of the RLI and reports to the RBA Board of Directors.

The Home Depot supports the following Vision and Mission of the RLI:
VISION: The rights and dignity of workers vulnerable to forced labor in global supply chains are consistently respected and promoted through responsible recruitment and employment practices.

MISSION: Members, suppliers, recruitment partners, and stakeholders use their collective influence and application of due diligence to drive the transformation of recruitment markets, reduce the risk of forced labor, and provide remedies in global supply chains at all stages of recruitment and employment.

Responsible Workplace Program



In addition to our membership in the RLI, The Home Depot has partnered with the Responsible Business Alliance Foundation to take part in the Responsible Workplace Program.

The Responsible Business Alliance Foundation and supporting program partner ELEVATE are implementing the Responsible Workplace Program, which aims to transform the market for ethical recruitment practices.

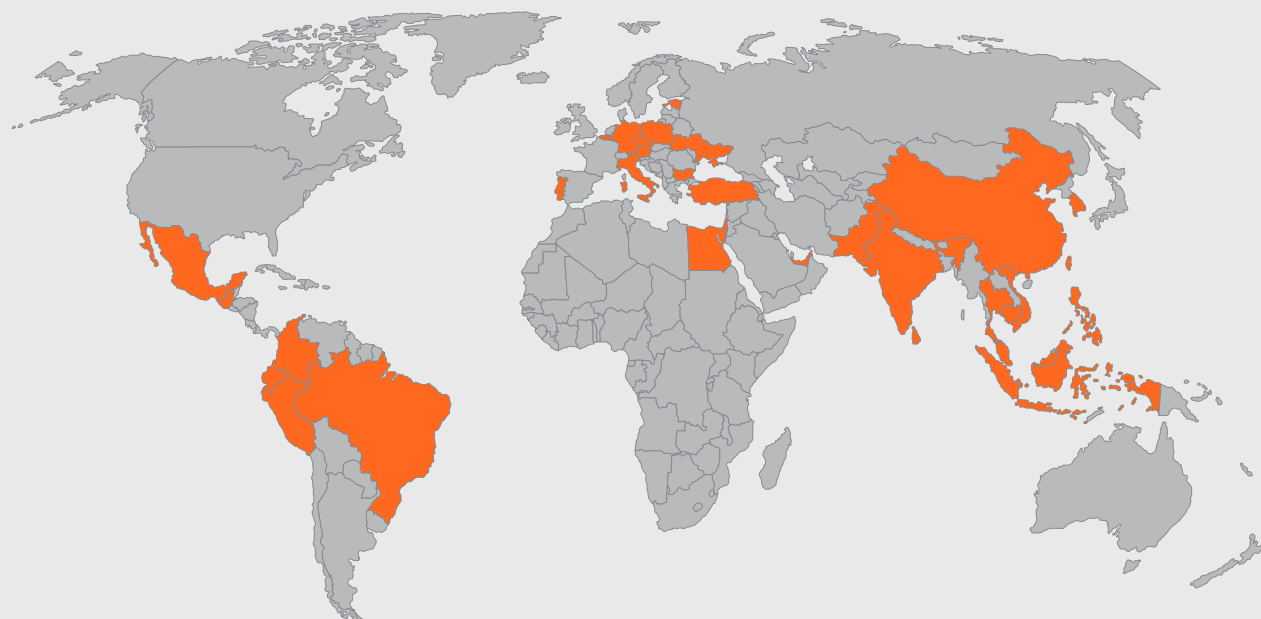
Program Elements Available to Participating Companies Include:

- Forced labor risks and recruitment worker surveys
- Worker-management communication training
- Effective pre-departure orientation training
- Mechanisms to improve workers' awareness of their labor rights
- Worker helpline and third-party support for migrant workers

Process

Audits

All non-Canada and non-U.S. factories producing private brand and direct import products for The Home Depot are required to receive a Responsible Sourcing audit prior to selling product to The Home Depot. We have the right to audit factories selling product to The Home Depot.



List of Countries Where Audits Were Performed

- | | | | | |
|----------|----------------|------------|-------------|----------------------|
| Austria | Colombia | India | Pakistan | Taiwan |
| Belgium | Czech Republic | Indonesia | Peru | Thailand |
| Brazil | Ecuador | Israel | Philippines | Turkey |
| Bulgaria | Egypt | Italy | Poland | Ukraine |
| Cambodia | Estonia | Luxembourg | Portugal | United Arab Emirates |
| China | Germany | Malaysia | South Korea | Vietnam |
| | Guatemala | Mexico | Sri Lanka | |

Corrective and Preventive Action (CAPA)

The Home Depot believes deficiencies found during an audit should be first reviewed and addressed by the factory management team. We believe it is not only important for the factory to correct the problem, but also to prevent that problem from happening again. To that end, we have developed a comprehensive review and remediation program to address these deficiencies. The Home Depot works with our factory partners to develop strong, actionable plans with reasonable timelines to ensure both corrective and preventive solutions are put in place.

CAPA Verification Program

This program requires additional verification visits after a CAPA plan is approved so that the original auditor can verify corrective and preventive actions have been implemented.

If a factory does not implement the corrective and preventive actions approved in their plan by the expected milestones in the program, The Home Depot may cease all future purchase orders with that factory.



The Home Depot Audit Process

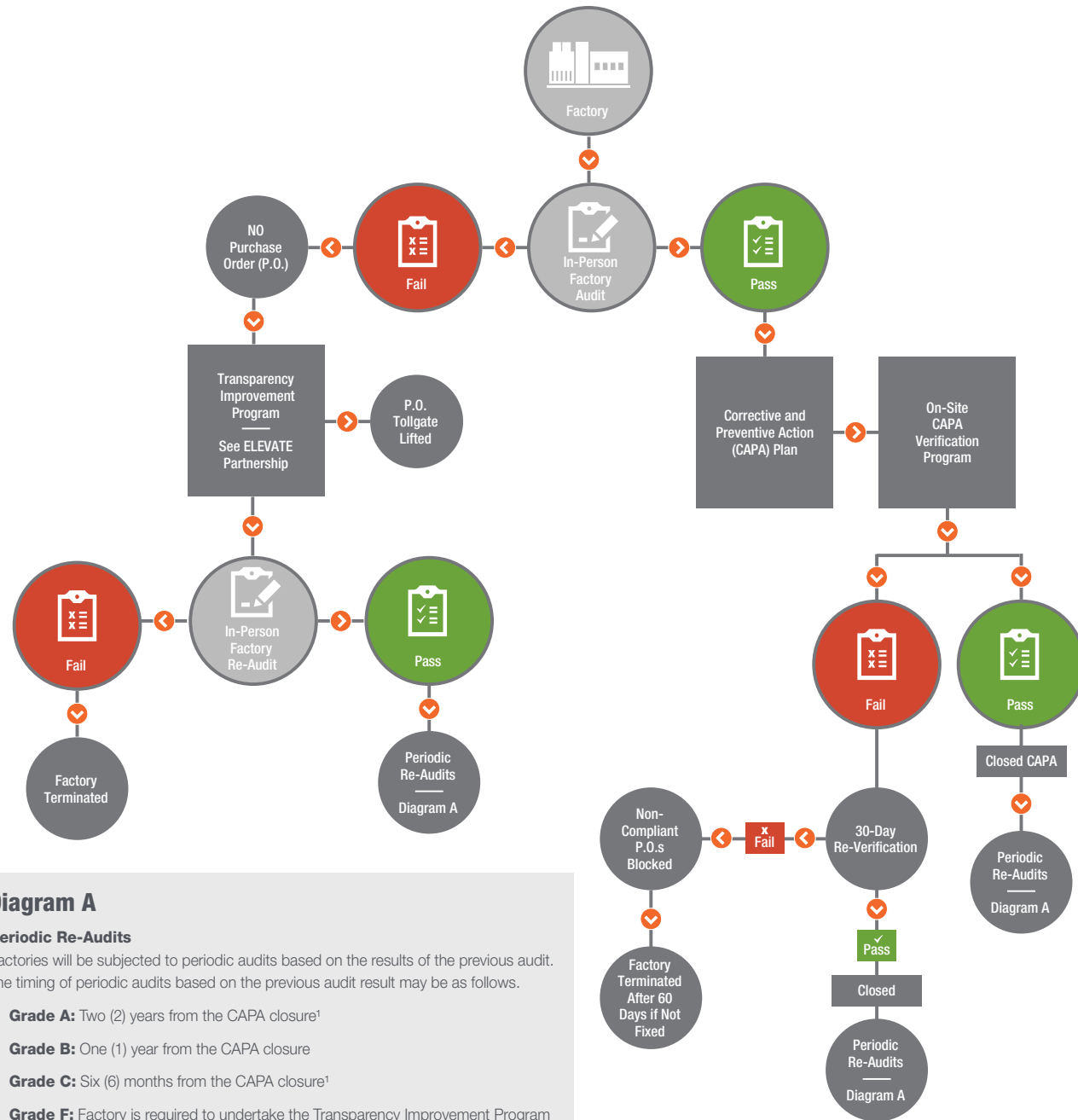


Diagram A

Periodic Re-Audits

Factories will be subjected to periodic audits based on the results of the previous audit. The timing of periodic audits based on the previous audit result may be as follows.

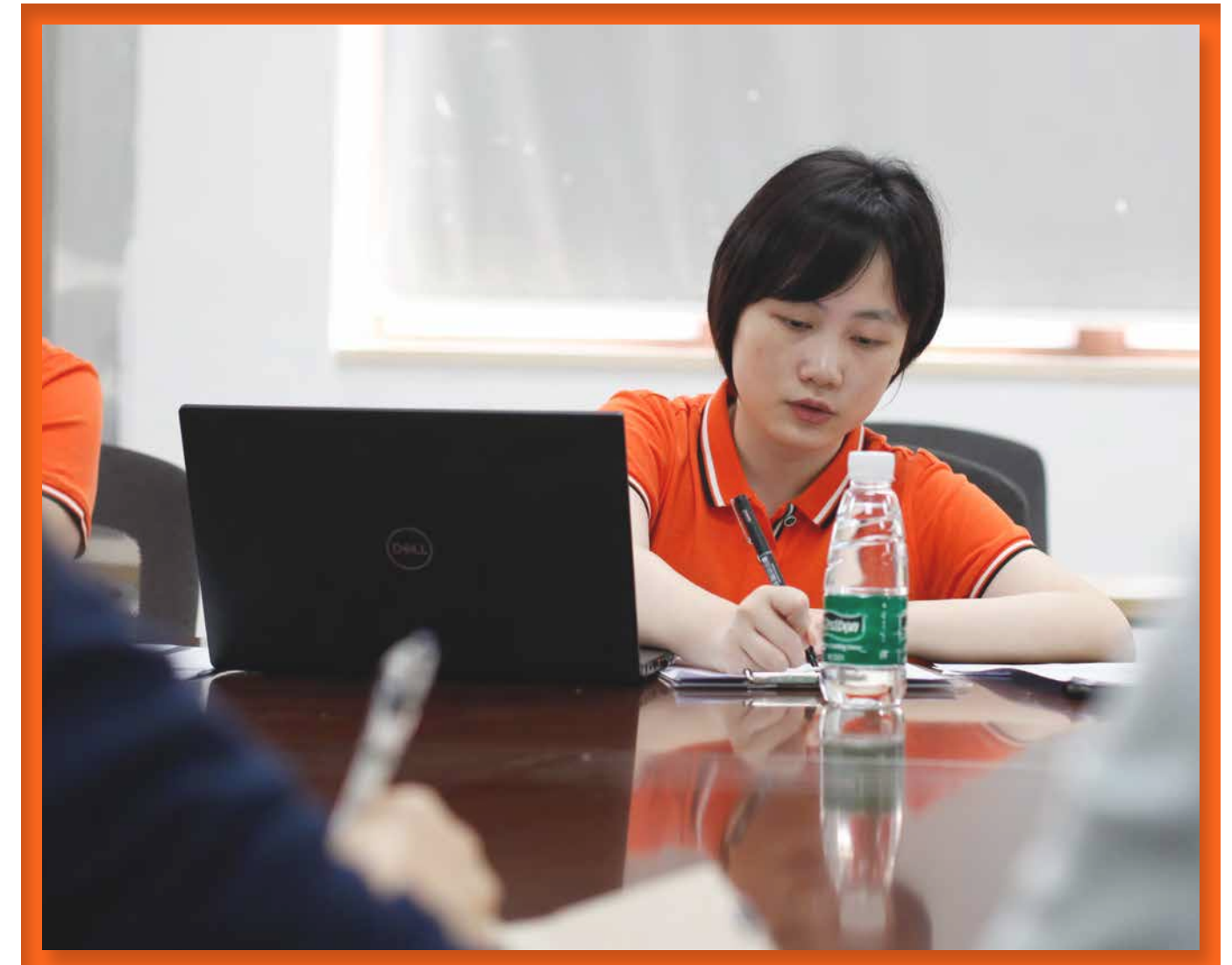
- **Grade A:** Two (2) years from the CAPA closure¹
- **Grade B:** One (1) year from the CAPA closure
- **Grade C:** Six (6) months from the CAPA closure¹
- **Grade F:** Factory is required to undertake the Transparency Improvement Program (TIP²). New audit required six (6) months from the date of the audit. At that time, the factory is expected to achieve a grade C or higher.

¹ THD reserves the right to audit more frequently at its discretion.

² See ELEVATE partnership section of this report.

ELEVATE Partnership

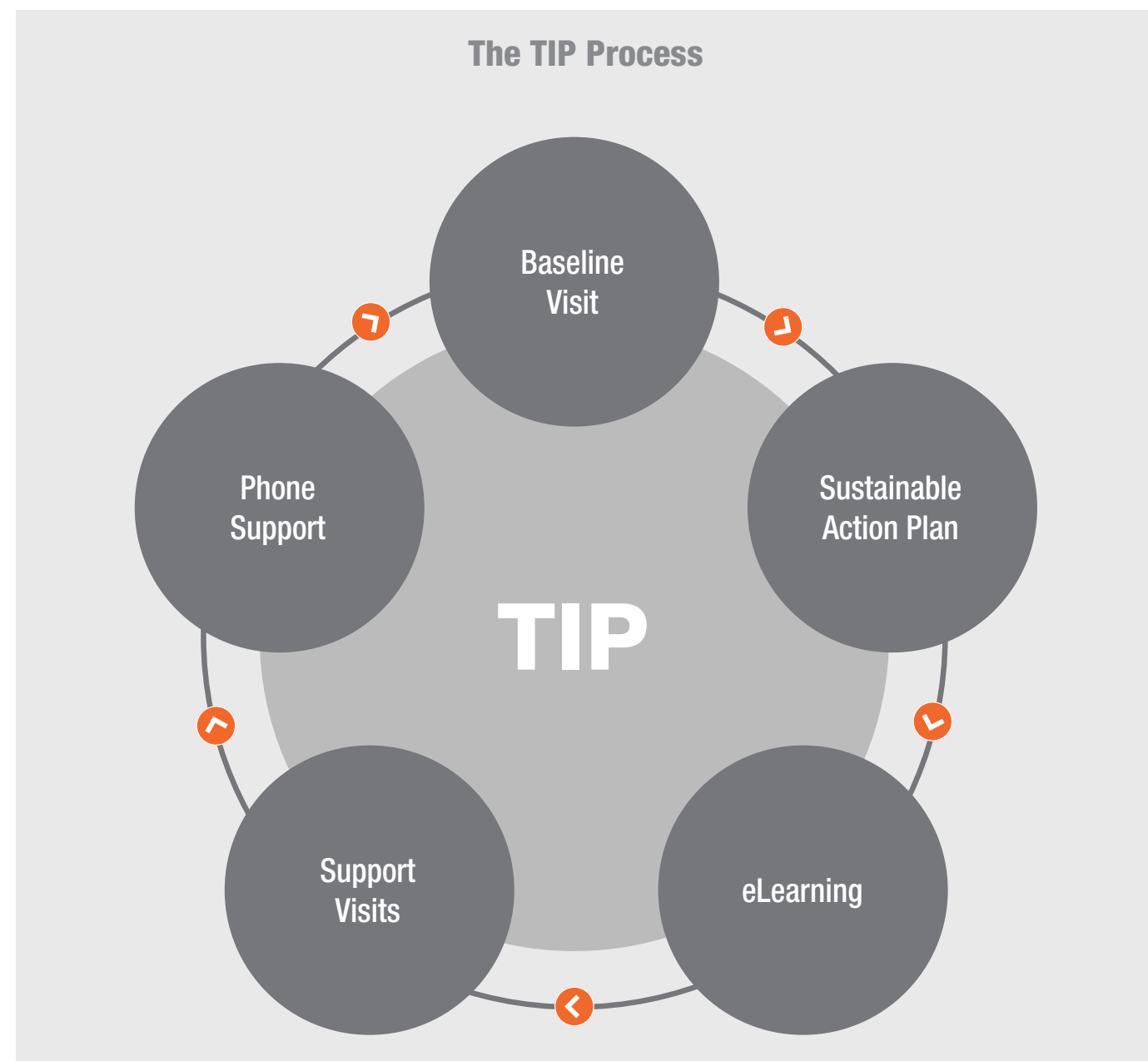
When heightened issues of noncompliance are identified, The Home Depot is committed to working with suppliers and factories above and beyond the traditional CAPA program to improve working conditions. The Home Depot has a two-pronged approach to working with suppliers and factories where recurrent or heightened issues have been identified: the factory-focused Transparency Improvement Program (TIP) and the supplier-focused Supplier Compliance Ownership Program Evaluation (SCOPE).



Transparency Improvement Program (TIP)

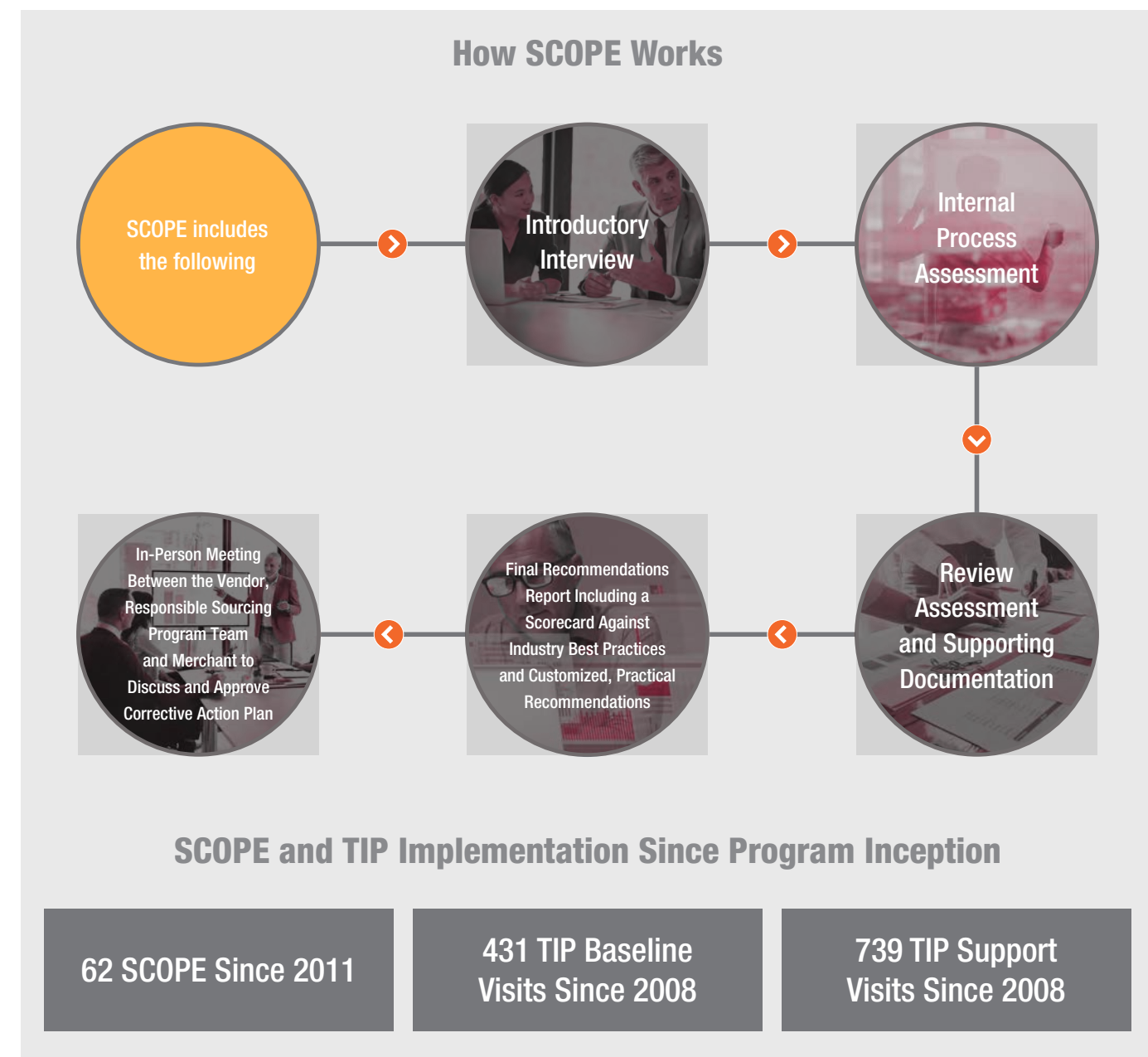
TIP is a factory-specific program unique to The Home Depot that is designed to support sustainable improvement for factories with recurrent and/or heightened issues. TIP was designed and is implemented by our third-party partner ELEVATE, a leading third-party business risk and sustainability solutions provider.

TIP is a six-month program designed to reinforce the need for transparency and provide factories with the opportunity and support needed to develop and implement management systems in a practical way and within reasonable time frames.



Supplier Compliance Ownership Program Evaluation (SCOPE)

When serious issues are identified in a factory, The Home Depot also works with the supplier to understand what went wrong and provides guidance on how to improve their systems for managing factory compliance. We partner with ELEVATE to use their SCOPE gap analysis to evaluate program effectiveness.



SCOPE and TIP Implementation Since Program Inception

62 SCOPE Since 2011

431 TIP Baseline Visits Since 2008

739 TIP Support Visits Since 2008

Training and Communication

32

Number of Countries

1,003

Online Course Completions

14

Live Virtual Training Sessions

684 vendors and factories worldwide

The Home Depot believes that through sufficient and effective communication, we can best partner with our suppliers and their factories to achieve our mutual goals.

The Home Depot continues to get closer to business partners via our online training system which provides an alternative solution for remote learning and helps our suppliers understand the Responsible Sourcing processes and policies, no matter where they are located. As a result, we have seen a significant shift by our vendors and factories in the utilization of the online and virtual training instead of the face-to-face classes.

In 2022, the online training:

- Continued to require that all new suppliers and factories undertake the training and present their certificate of completion at the time of their next audit. We believe this is driving better factory performance in our Responsible Sourcing Program audits.
- Continued to post a real-time seminar calendar online to give suppliers and factories the flexibility to register and join the training which fits their schedule and location.

Our online training program also has an "ask question" function so the Responsible Sourcing team can provide timely responses to the suppliers' and factories' questions.

We are committed to being transparent with our partners and to helping them understand our expectations so that they in turn will be transparent with us.

Country Law Governance

The Home Depot Responsible Sourcing team developed digital country law guides for 14 key countries of expansion outside of China to support the global supply chain migration we have seen since 2020. Each of these 14 guides contains a comparison to the corresponding Chinese laws related to our Responsible Sourcing Standards.

These guides provide our China-based Responsible Sourcing team with additional tools to better understand the varying legal requirements across key nations where our supply chain has expanded. The team has also utilized this tool to educate our internal and external partners. This includes monthly workshops with our global sourcing teams to ensure they understand how these requirements differ in each country, and what they should look for when conducting their own due diligence of new supply chain partners.

The following graphics illustrate the types of information contained in the guides at the time of publication.

VIETNAM	CHINA
Child Labor/Young Employment	
Child labor: <15 years old Young employment: <ul style="list-style-type: none"> 13-15, only could work in specified work type list in MOLISA 15-18, work in certain situation, with separated employee register approved by local labor office 	Child labor: <16 years old Young employment: <ul style="list-style-type: none"> 12-16 years old: forbidden; only literature and art, physical culture and sport, special arts 16-18 years old: no hazard, health check, acknowledged by local government
Employment Type	
Contracts: Two copies of written except for working terms less than 1 month Contract terms: Unfixed terms, fixed terms (<36 months) Trial period: (>=85% of the official salary>=minimum wage) <ul style="list-style-type: none"> Normally 30 days, less than 2 months, 6 days for non-skilled jobs Termination notice: <ul style="list-style-type: none"> 45 days for unfixed term 30 days for fixed term 3 days for seasonal or less than 12 months Severance pay: Worked for 12 months, 0.5 months salary for each working year Special requirement: Seasonal or terms under 12 months worker could not do regular works from 12 months and above	Contracts: Two copies of written Contract terms: Unfixed terms, fixed terms Trial period: (>=80% of the official salary>=minimum wage) <ul style="list-style-type: none"> Terms <3 months: no trial period 3 months-1 year: <1 month 1-3 years: <2 months Above 3 years: <6 months Termination notice: Normally 30 days; 3 days for trial period Severance pay: <ul style="list-style-type: none"> <6 months: 0.5 months salary 6 months-1 year: 1-month salary >1 year: 1-month salary for each working year
CAMBODIA	
Child Labor/Young Employment	
Child labor: <15 years old Employment: <ul style="list-style-type: none"> 12-15 years old: light work, no hazard, consulted with the Labour Advisory Committee 15-18 years old: H&S should be guaranteed/no excessive overtime 	Child labor: <16 years old Employment: <ul style="list-style-type: none"> 12-16 years old: forbidden; only literature and art, physical culture and sport, special arts 16-18 years old: no hazard, health check, acknowledged by local government
Employment Type	
Part-Time worker: <48 hours per week Temporary worker: <21 days/months and 2 months Foreign employees: <ul style="list-style-type: none"> Service fee: <10% of total amount Visa application fee: USD 20/1st time, USD 100/re-apply 	Part-Time worker: Less than 10% Temporary worker: <6 months, temporary, auxiliary or substitute job positions only Foreign employees: USD 25 for the visa
Regulations/Contractual	
Internal regulations: >8 employees: needs approval by inspector Labor contract: <ul style="list-style-type: none"> <2 Years: undetermined duration contracts >2 Years: fixed duration contracts Strike: N/A <ul style="list-style-type: none"> Prior notice: at least 7 working days The employer: refuse to pay their wage during the strike/could not hire new employee to replace them 	Internal regulations: Posted in factory (no approval required) Labor contract: Open-ended contract: <ul style="list-style-type: none"> 3rd time sign the contract Or More than 10 years Strike: N/A

**Conflict Minerals
+ Ethical
Accountability**



Conflict Minerals

14

In-Scope Tier 1 Suppliers

The Home Depot is committed to the responsible sourcing of materials for our products, and we expect that our suppliers are likewise committed to responsible sourcing.

Our Expectations

We expect all suppliers manufacturing our products to partner with us to provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the conflict minerals law. We further expect all suppliers manufacturing our products to adopt sourcing practices to obtain products and materials from suppliers not involved in funding conflict in the Democratic Republic of the Congo and adjoining countries.

Our Partnerships

We partnered with our private brands and proprietary suppliers whose custom products contain Tin, Tungsten, Tantalum or Gold (3TG) to identify the source of any 3TG in the supply chain.

Through our due diligence process, which aligns with due diligence guidance from the Organization for Economic Co-Operation and Development (OECD), we received 100% participation from our in-scope private brands and proprietary Tier 1 suppliers for the calendar year ended December 31, 2022.

We continue to work closely with our suppliers to ensure that they implement responsible sourcing and encourage their smelters to obtain a “conflict-free” designation from an independent third-party auditor.



* Of the 31 SORs with an indication of sourcing in the covered countries, all were certified as DRC Conflict-Free by either the Responsible Minerals Initiative, the London Bullion Market Association and/or the Responsible Jewelry Council.

We report this data as of the calendar year ended December 31, 2022, consistent with U.S. Securities and Exchange Commission rules.

43%

Indicated 3TG in Their Products

87

Countries Where 3TG Was Sourced

97

Verified Smelters or Refiners (SORs)

31*

SORs Sourcing from Democratic Republic of the Congo (DRC) or Neighboring Countries

Ethical Accountability

Promoting a Culture of Ethical Accountability

We provide ways for our suppliers, factory workers and service providers to report concerns when they think our Home Depot Responsible Sourcing Standards, values or compliance with the law may be compromised.

Anonymous Reports

Workers in all countries where we source goods may submit anonymous reports via www.THDSupplierAlertLine.com

Supplier AlertLine

Supplier AlertLine is answered by a live operator 24/7 in these countries:



U.S. and Canada
1-800-435-3152



Mexico
001-888-765-8153



China
86-400-880-1045



India
(Dial Direct Access) **000-117**
then (Dial) **800-435-3125**



Vietnam
(Access Code) **1-201-0288**
then (Dial) **800-435-3152**



THD Responsible Sourcing Team

Todd A. Nash – Director



Todd Nash joined The Home Depot in January 2011 as the Director of Responsible Sourcing. Prior to joining The Home Depot, Todd led the Global Product Compliance team at Amazon.com, was responsible for regulatory compliance at West Marine and partnered with multiple U.S. government agencies as a consultant with Booz Allen & Hamilton.

A native of Rhode Island, Todd holds a B.A. degree in Political Science and English from the University of Rhode Island.

Todd also received his master's degree in Public Administration from the Maxwell School of Citizenship and Public Affairs at Syracuse University.

Cathy Cao – Senior Manager



Cathy Cao joined the Responsible Sourcing team as Senior Manager in November 2014. She is responsible for managing the Asia Responsible Sourcing team to drive and implement the company's global strategy throughout The Home Depot and supply chain partners. Cathy also leads the team to work closely with our third-party audit firm partners to ensure they are meeting our service level expectations and collaborates with multi-functional teams throughout The Home Depot to support the overall global sourcing business.

Prior to joining the Responsible Sourcing team, Cathy was the Supplier Quality Engineer (SQE) and led the SQE team of multiple categories in The Home Depot Asia Sourcing Office (ASO); was responsible for quality assurance at H.E.F. Group; and was a Radio Frequency Testing Engineer at Lucent Technologies.

Cathy holds a B.A. degree in English from the Shanghai International Studies University.

Weina Li – Manager



Weina Li joined The Home Depot in June 2012 as Assistant Manager of Responsible Sourcing and was promoted to Responsible Sourcing Manager in April 2014. She is responsible for supporting the Responsible Sourcing Senior Manager to manage the daily operation of the Responsible Sourcing team in Shenzhen and works closely with the third-party service provider for Responsible Sourcing audit-reporting system maintenance and enhancement. Weina also supports the Responsible Sourcing Senior Manager on Responsible Sourcing SOP enhancement and project management.

Prior to joining The Home Depot, Weina worked at PCH International as Senior Compliance Officer for four years and as Senior Account Manager and Auditor of System Auditing at TUV Rheinland Shenzhen Co., Ltd. for five years.

Weina holds a master's degree in Business Administration from the Renmin University of China.

Samantha Li – Senior Specialist



Samantha Li joined THD in September 2013 as Responsible Sourcing Senior Specialist. She works closely with the Responsible Sourcing ASO team and related Global Sourcing cross-functional teams in charge of all responsible sourcing issues for the kitchen and bath, indoor garden, and building material departments and The Home Depot Pro. Samantha has 15 years of working experience in social compliance and quality assurance auditing.

Prior to joining The Home Depot, Samantha worked as a Senior Assessor at PVH. Before that, she also worked as Social Compliance Specialist at Knothe Apparel Group SHA.

Samantha holds a bachelor's degree in Business Administration from the University of International Business & Economy in Beijing.

Nga Bui – Senior Specialist



Nga Bui joined The Home Depot in December 2022 as Senior Responsible Sourcing Specialist. She is responsible for implementing the Responsible Sourcing management system in our Southeast Asia supply chain, coordinating with functional teams and supporting the business growth in the THD Vietnam Sourcing Office.

Nga has 17 years of working experience in social compliance management and auditing in factory and sourcing companies. Prior to joining The Home Depot, she worked for Clarks Representative Office as a Supplier Working Condition Auditor and for Dintsun Enterprise Ltd. as Social Environmental Affairs Team Leader.

Nga holds a bachelor's degree in English Linguistics & Literature from the University of Social Science and Humanities, and a bachelor's degree in Human Resources Management from Open University of Ho Chi Minh City.

Wendy Liu – Senior Specialist

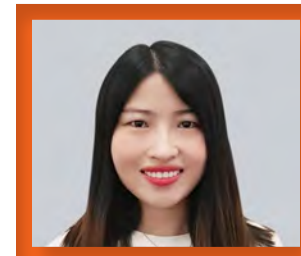


Wendy Liu joined The Home Depot in September 2017 as Responsible Sourcing Specialist. She is responsible for The Home Depot Responsible Sourcing Program service provider and supplier monitoring processes for the lighting, storage and digital décor departments. Wendy also is responsible for conducting factory audits and coordinating with functional teams in the Shenzhen ASO.

Prior to joining The Home Depot, Wendy worked as Social Compliance Auditor at UL for seven years.

Wendy holds a bachelor's degree from Hubei University in Economics.

Belle Hu – Specialist



Belle Hu joined The Home Depot in August 2022 as Responsible Sourcing Specialist. She works closely with the Responsible Sourcing ASO team and related Global Sourcing cross-functional teams in charge of all responsible sourcing issues for kitchen and bath, home application, patio, cleaning, BBQ and plumbing.

Belle has nine years of working experience in social compliance. Prior to joining The Home Depot, Belle worked as Responsible Sourcing Specialist at Tesco for four years. Before that, she also worked as Social Compliance Auditor and Report Reviewer at UL for four years.

Belle holds a bachelor's degree in International Economics and Trade from Arts and Sciences University of Hubei.

“

Through partnership with The Home Depot, we have put “Doing the Right Thing” into our day-to-day operations, at our factories, as well as within our suppliers.

— George Xia, VP Operations, Apex Tool Group

”

Apex Tool Group partnered with The Home Depot Responsible Sourcing team over a decade ago and continues to find new ways to improve our Responsible Sourcing Program. We have incorporated and standardized our Responsible Sourcing Program management system in every country where we operate globally and in our factories and sub-tier suppliers. We developed a global Responsible Sourcing Program team that drives internal audits, best practice sharing, and training of our associates and suppliers. Since the introduction of the program, we have seen improvements throughout our organization, but most importantly, we have seen a positive change in our people. Associates and partners value the program and are delighted we have a safe and enjoyable work environment in all our factories and supplier factories.







Corporate Policy – LG-006

Name: Human Rights Policy

Version #: 1.0

Owner: Legal

Distribution: All MBC Associates

Purpose

MasterBrand, Inc.'s purpose is to bring our customers' experience of their kitchen being the center of home, where family and friends gather to share a meal, do work, or enjoy each other's company to life. Fulfilling that mission rests on our commitment to our associates and communities and on our commitment to conduct business ethically and responsibly. Respect for human rights is a cornerstone of those commitments.

Consistent with the UN Guiding Principles on Business and Human Rights, MasterBrand' Human Rights policy is guided by the International Bill of Human Rights (including the UN Universal Declaration of Human Rights), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the principles concerning fundamental rights set out in the OECD Guidelines for Multinational Enterprises.

This Human Rights Policy applies to MasterBrand, Inc. and all our businesses on a global basis ("MasterBrand" or the "Company"). This Human Rights Policy aligns with our [Code of Business Conduct & Ethics](#) and our [Supplier Code of Conduct](#).

Human Rights in the Workplace

MasterBrand is committed to fostering a workplace that is professional and respectful. Diversity is a necessary and strategic goal for our business. Consistent with the MasterBrand Code of Business Conduct & Ethics, we endeavor to promote an atmosphere of trust and respect and encourage a work environment where employees are treated fairly and given opportunities to contribute to our success. This means:

- We provide equal employment opportunities to all employees and applicants. MasterBrand recruits, employs, trains, evaluates and promotes qualified people for all positions without regard to race, color, religion, sexual orientation, marital status, national origin, citizenship, sex, age, disability, genetics, military or veteran status or any other basis prohibited by law.
- We do not tolerate any form of harassment. Any unwelcome conduct that creates an offensive or intimidating environment is prohibited.
- We provide robust training to our employees, both during onboarding and on an ongoing basis, that emphasizes our commitment to diversity and inclusion, non-discrimination and prohibited harassment.
- We are committed to maintaining a safe, secure and healthy work environment. Our [Safety & Environmental Policy Statement](#) guides our businesses every day in our global effort to ensure the safety and health of our people. Safety is routinely emphasized by leaders through town halls, video messages, trainings and other communication channels.
- We value our people and compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.
- We respect employees' right of freedom of association and their right to join or not join in labor unions.
- We do not employ forced, compulsory, slave or illegal child labor.

Empowering Women

We embrace the United Nations Women's Empowerment Principles. We recognize that, on a global basis, many women face discrimination and lack access to training or are subject to other disadvantages that hinder their active participation in the economy. Women are integral to our business model and growth. We are committed to operating our business in a manner that encourages and fosters women's participation on an equal basis. Our approach starts with respect for the rights of women and extends to their promotion, including helping women to develop skills and access opportunities on an equal basis.

Human Rights in the Supply Chain

MasterBrand takes issues relating to human rights and labor practices in our supply chain seriously. Our Supplier Code of Conduct establishes clear expectations of our suppliers to respect internationally recognized human rights, comply with all applicable laws and conduct their business in an ethical and responsible manner.

Consistent with our Supplier Code of Conduct, MasterBrand prohibits its suppliers from engaging in:

- Illegal child labor;
- forced, compulsory, or slave labor; and
- discrimination, harassment or corruption in the workplace.

MasterBrand qualifies potential suppliers based on several factors, including global citizenship. Our risk-ranking methods and audit process allow us to focus our time and resources on supplier partnerships that adhere to the same strict standards we set for ourselves. We regularly audit our suppliers based on several factors, including human rights practices. We partner with our suppliers to drive continuous improvement and track corrective actions to closure. Suppliers who fall below our standards and do not have the capacity or desire to make necessary adjustments are removed.

Conflict Minerals

MasterBrand discloses any use of Conflict Minerals and the Company's efforts to conduct reasonable country of origin inquiries for any Conflict Materials in an annual report filed with the U.S. Securities and Exchange Commission, as required by applicable rules.

Anti-Corruption

MasterBrand is committed to acting with the highest ethical standards. Consistent with our Code of Business Conduct & Ethics, we strictly comply with the U.S. Foreign Corrupt Practices Act and strictly prohibit bribing or making improper payments to any governmental official anywhere in the world. We regularly train our employees on our commitment to compliance with the U.S. Foreign Corrupt Practices Act.

Due Diligence

MasterBrand identifies, mitigates and manages potential human rights risks through implementation and management of our Code of Business Conduct & Ethics and Supplier Code of Conduct.

Governance

MasterBrand's Compliance Committee oversees compliance with MasterBrand' Code of Business Conduct & Ethics, which includes our human rights commitments. The Compliance Committee reports to the MasterBrand Board of Directors annually regarding compliance and employee training. Senior management also provides a semi-annual update on Environment,

Health and Safety matters and global citizenship efforts, such as our diversity and inclusion efforts, to the Nominating, Environmental, Social and Governance Committee of the Board of Directors, which has responsibility for monitoring our EH&S and global citizenship programs.

Reporting

MasterBrand encourages its employees to [speak up](#) if they believe they have witnessed wrongdoing or misconduct. Similarly, MasterBrand encourages everyone to speak up and contact us if there are any questions, concerns or issues related to this Human Rights Policy. You can speak up in the following ways:

- Call the Compliance Helpline:

United States: 833-416-5415

Canada: 833-416-5416

Mexico: 800-681-6922

- Calls to the compliance helpline can be made anonymously. International toll-free dialing instructions can be found at <http://masterbrand.ethicspoint.com/>
- Visit the Compliance Hotline Website <http://masterbrand.ethicspoint.com/>

Reports to the compliance hotline website can be made anonymously. You can also use the website to follow up on an existing report.

MasterBrand prohibits retaliation against anyone for raising legitimate concerns. We are committed to investigating and responding to concerns in a prompt and responsible manner.

December 14, 2022



MANITOBA Head Office
4987 Portage Avenue West
Headingley, MB, R4H 1C7
Phone: (204) 889 6500
Fax: (855) 313 0619

Bill S-211 Annual Report. Forced Labour in Canadian Supply Chains

In accordance with Bill S-211 Matix Lumber INC has completed the required annual reporting on Forced Labour in Canadian Supply Chains. A review of the company policies and procedures found that the existing systems that govern our activities safeguard against forced labour and against child labour.

We are a COR certified company and follow a comprehensive safety plan with special attention paid to policies protecting workers from violence or harassment as well as informing them of their rights and ensuring all work is undertaken in a safe manner by competent professionals.

Our material supply chain is managed and monitored by our internal purchasing team who ensure that all suppliers carry on business at a high standard of professionalism and ethics. Our subcontractors are governed by a compliance declaration and project reporting policies that ensure workers know their rights and protections.

As more specific guidance is made available by the government on reporting and prevention measures against Forced Labour in Canadian Supply Chains we will adjust any necessary elements of our safety plan to ensure best practices are maintained.

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. **General Information:**

- Name of the supplier: Mid Canada Reinforcing Inc
- Contact person and their position: Blake Remple - Vice President
- Address of the supplier: 6B St. Paul Blvd West St Paul MB
- Nature of business: Rebar + steel beam Fabrication
- Number of years in operation: 31

2. **Supply Chain Transparency:**

- Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.
Werdau, MANA, Alta steel, Acerco KSE, Jebson + Jessen Metals,
Triad Metals, Crawford Metal
- How do you ensure transparency and traceability throughout your supply chain?
N/A
- Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.
NO
- Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.
NO WE ASSUME THAT EACH SUPPLIER
FOLLOWS THE LABOUR STANDARDS
WITHIN THEIR TERRITORY BUT WE DO
NOT REQUIRE PROOF.

3. **Labour Practices:**

- Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

WITHIN OUR ORGANIZATION WE CAN CONFIRM
BUT NOT WITHIN OUR SUPPLY CHAIN

- How do you ensure that your employees and those of your subcontractors are of legal working age?

WE REQUIRE EITHER A COPY OF THEIR
DRIVERS LICENSE OR BIRTH CERTIFICATE.

- What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

WE HAVE REGULAR MEETINGS WITH OUR STAFF
& ALLOW THEM TO VOICE ANY CONCERNS THEY HAVE WITHIN
OUR WORKPLACE. WE FOLLOW UP WITH STAFF IF THEY WANT TO

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

WE HAVE REGULAR DISCUSSIONS WITH OTHER COMPANIES
WITHIN OUR INDUSTRY TO GET A SENSE OF WAGES & WORKING
HOURS →

- Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

NO

4. **Monitoring and Compliance:**

- How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

WE HAVE REGULAR COMMUNICATION WITH
OUR LAWYERS TO ENSURE WE ARE FOLLOWING
THE MOST CURRENT LABOUR STANDARDS & HUMAN RIGHTS.

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

NO

DISCUSS ANY CONCERNS IN PRIVATE

WE HAVE LOW TURNOVER WHICH REFLECTS
THE WAGES WE PAY & THE WORKING
CONDITIONS WE PROVIDE.

- Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

N/A

5. **Reporting and Remediation:**

- What processes do you have in place for reporting and addressing grievances related to labour rights violations?

ALL STAFF HAVE DIRECT ACCESS TO THEIR SUPERVISOR & THE SENIOR MGMT TO DISCUSS ANY & ALL GRIEVANCES.

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

N/A

- Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

YES

6. **Future Commitments:**

- What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

COMMITTED CONTINUE NONE AT THE PRESENT TIME, BUT TO BE INFORMED ON THE MOST CURRENT STANDARDS

- Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

NO

7. **Documentation and References:**

- Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

N/A

- Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

N/A.

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: Plumb-X Plumbing Inc

Contact person and their position: Eugen Kvaternik

Address of the supplier: BOX 518 Oakbank MB. R0E 1J0

Nature of business: Plumbing

Number of years in operation: 22 years

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company NONE

How do you ensure transparency and traceability throughout your supply chain?
N/A

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.
NO

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.
Not sure

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

In my organization it is voluntary, supply chain I don't know.

How do you ensure that your employees and those of your subcontractors are of legal working age?

I have their personal information on file.

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Regarding my organization I handle any complaints personally, supply chain no idea.

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

YES.

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

NO.

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

By ensuring my employees follow Manitoba Health and Safety rukles.

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

NO

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

NO

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

Report to me directly

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

There have never been complaints in my organization, as far as my supply chain goes I'm not aware of how they handle that.

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

YES

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

NONE I have no transparency issues

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

NO I have no slaves working for me

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

N/A

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

A&S Homes & EMCO Corporation

Subcontractor and Suppliers Involved in Goods or Services

Dear Customer,

Subject: Assurance of Compliance with Legislative Requirements of Bill S2-11

At Cornerstone Building Brands, we are committed to upholding the highest standards of integrity, transparency, and compliance in all aspects of our operations.

As you may be aware, Bill S2-11 aims to enhance supply chain transparency and mitigate risks associated with human trafficking in supply chains. This letter is to assure you that we are proactive in our efforts to comply with the letter and the spirit of these regulations.

We take social responsibility seriously, as reflected in our Supplier Code of Conduct, which you can view [here](#) and our Environmental Social and Governance Report, which you can view [here](#)

We understand the importance of transparency and accountability in today's business environment and will be publishing our Annual Report, as required by Bill S1-11, in the coming weeks.

Should you have any questions or concerns regarding our compliance efforts or any other matter, please do not hesitate to contact us.

Thank you for your continued trust and partnership. We look forward to serving you and maintaining our strong business relationship for many years to come.

Steve Richardson

Steve Richardson
Vice President Supply Chain, Canada
M: 226-388-3052
E: Steve.richardson@cornerstone-bb.com



Our building solutions are the cornerstone
of the communities we serve



CORNERSTONE BUILDING PRODUCTS SUPPLIER CODE OF CONDUCT

(Effective December 31, 2022)

Introduction

Cornerstone Building Brands' (CBB's) commitment to doing what's right underscores everything we do each day. We are committed to business integrity, responsible product sourcing, the safety and wellbeing of workers across the global supply chain and to driving compliance with the letter and the spirit of the laws and regulations that apply to our business. We hold our business partners, suppliers, contractors and vendors (collectively Suppliers) to these same standards.

This Supplier Code of Conduct (Supplier Code) establishes the minimum standards that must be met by Suppliers that sell goods or services to CBB. Suppliers must comply with the standards established in the Supplier Code throughout their operations and ensure compliance throughout their own supply chain by their suppliers, vendors, agents, and subcontractors (Partners).

CBB Supplier Standards

Labor and Human Rights

No Child Labor

- Suppliers must not employ workers younger than the greater of
 - 15 years of age or 14 where allowed by local law and consistent with standards established by the international labor organization core conventions
 - the age for completing compulsory education, or
 - the minimum age established by applicable local law
- Suppliers must comply with all local legal requirements for the work of authorized young workers, including but limited to the laws covering hours of work, wages, and working conditions.
- Supplier shall not, and shall ensure that its Partners do not, support or engage in, or require any hazardous labor to be performed by any person under the age of 18. Hazardous labor involves any work, that by its nature or the circumstances in which the work is undertaken, involves substantial risk of harm to the safety or health of the worker or coworkers if adequate protections are not taken.

No Forced Labor

Supplier shall not support or engage in slavery, human trafficking or any form of forced labor in any part of its supply chain. Forced labor refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities. All labor must be voluntary and workers must provide free, prior and informed consent.

- Supplier shall not, and shall ensure that its Partners do not, support or engage in, or require any:
 - Compelled or involuntary labor
 - bonded labor
 - indentured labor.
- The use of prison or convict labor cannot be forced and must be consistent with the laws where any products supplied are manufactured and the laws where any products supplied are imported.
- Supplier shall not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, unless such holdings are required by law.
- Supplier shall not, whether or not as a condition to the right to work, require any worker (or worker's spouse or family member) to, directly or indirectly:
 - pay recruitment or other fees or other amounts (monetary or in-kind)
 - incur debt
 - make financial guarantees
 - incur any other financial obligation.
- Supplier shall ensure that workers have the right to freedom of movement without:
 - delay or hindrance
 - the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.
- Supplier shall allow workers to terminate their employment or work arrangement without restriction and without the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.

Compensation

Supplier must meet or exceed the minimum wage requirements as defined under applicable labor laws, applicable agreements and local regulations for regular work, overtime work, production rates and other elements of compensation and employee benefits.

No Discrimination, Abuse, or Harassment

Suppliers shall treat workers with respect and dignity. Supplier shall not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Supplier must not condone or tolerate such behavior by its Partners.

Freedom of Association

Suppliers must recognize and respect the rights of workers to exercise lawful rights of free association including joining or not joining any associations. Suppliers must also respect applicable laws regarding workers' rights related to collective bargaining.

Workplace Health and Safety

- Supplier shall provide a secure, safe, healthy, and sanitary working environment in accordance with applicable laws and regulations.
- Supplier shall implement procedures and safeguards to maintain workplace security and to prevent workplace hazards and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific workplace hazards, and work-related accidents and injuries.
- Supplier shall provide workers adequate and appropriate training and personal protective equipment to protect workers against hazards typically encountered in the scope of work.

Environmental Stewardship

- Suppliers are encouraged to understand their environmental impact, related responsibilities and risk, and to study how they may reduce their greenhouse gas emissions and engage in the development of climate-friendly technologies and/or practices.
- Suppliers shall conduct their operations in compliance with all applicable environmental laws, including laws and international treaties relating to waste disposal, emissions, discharges, and hazardous and toxic material handling.
- Suppliers must ensure that any goods sold to CBB (including the inputs and components that incorporated into their goods) comply with all applicable environmental laws and treaties.

Lawful and Ethical Business Practices

- Supplier shall comply with all applicable national and local laws and regulations, including but not limited to the laws and regulations relating to the topics covered in this Supplier Code. Where this Supplier Code requires a higher standard than established by law or regulation, Supplier shall meet the higher standard.
- Supplier shall comply with CBB's Anti-Bribery Policy and all applicable anti-bribery laws including the US Foreign Corrupt Practices Act, the UK Bribery Act, and local laws addressing the bribery of government and/or non-government officials.
- Suppliers must avoid conflicts of interest in their relations with CBB. Business decisions must not be influenced by personal, family or other outside considerations.
- Suppliers must comply with and have appropriate policies governing all import and export controls, sanctions and other trade compliance laws.
- Suppliers must comply with applicable laws promoting free and fair competition including antitrust laws and regulations and truth in advertising requirements.



Confidentiality and Data Protection

- Suppliers must protect CBB's confidential information, including intellectual property and personal information.
- Suppliers shall apply adequate data privacy and security protection to individuals' personal information processed on behalf of CBB and will operate in a manner consistent with applicable data protection laws.

Questions and Concerns

Communications and Reporting

Suppliers must self-report any actual or suspected violations of the Supplier Code. Supplier can also submit questions and comments regarding the Supplier Code via any of the following channels:

- Your CBB Supply Chain representative
- The CBB Ethics and Compliance Office via compliance@cornerstone-bb.com
- The CBB Integrity Helpline via 1-844.637.6756, or online via CornerstoneBuildingBrands.EthicsPoint.com

CBB will review all concerns received and expects Suppliers to cooperate fully to ensure a meaningful and thorough investigation. Suppliers should have their own systems to receive concerns, conduct investigations, and take corrective measures when appropriate.

Good Faith Reporting and Retaliation

Supplier shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Code of Conduct. Suppliers must take appropriate measures to prevent retaliation and address confirmed allegations as necessary.

Right to Audit

CBB reserves the right to audit Suppliers' adherence to this Code of Conduct. Audits may be conducted by CBB personnel or by qualified third parties and may include documentation review and/or on-site Supplier visits. CBB expects its Suppliers to also reserve the right for such audits of their Partners.

Termination

CBB may immediately terminate its business relationship with Supplier if Supplier or any of its Partners fail to comply with the Supplier Code.

Indemnification

CBB reserves the right to request indemnification for any costs incurred as a result of Suppliers' non-compliance with this Supplier Code or its non-compliance with any audit request made by CBB.

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: Robinson Lighting

Contact person and their position: Matthew Paterson - CEO

Address of the supplier: 995 Milt Stegal Drive, R3G 3H7

Nature of business: Lighting Showroom

Number of years in operation: 88

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

Please see the list at the end of this document.

How do you ensure transparency and traceability throughout your supply chain?

We work to create long-term relationships with reputable vendors that share our beliefs around transparency and ethical behaviour. Our suppliers are reviewed annually for their business practices, and we engage with their stakeholders to understand their approach to these types of issues.

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

We do not conduct formal audits. We review our suppliers annually for overall business practices.

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

Yes, the provincial and federal laws and regulations.

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

For our organization we can confirm, yes. For our suppliers, we can confirm that to the factory level. We do not have visibility of the factories suppliers

How do you ensure that your employees and those of your subcontractors are of legal working age?

For our own staff, we ensure this during the interview process. For subcontractors that is not applicable.

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Internal policies and ensuring we are following provincial and federal laws and regulations.

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

Yes.

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

Yes.

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

Ensuring our own policies are followed and upheld by our management staff. For our suppliers we do our best to stick to our vetted network and continue to discuss these topics during our supplier reviews annually.

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

No

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

No

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

Grievances can be brought to our Human Resources department and then escalated to the CEO or owners if needed. The provinces we operate in also have labour boards as direct contacts to address the concerns of our staff.

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

When identified, our policies would be reviewed and updated to be on-side with any legal obligations.

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

Yes

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

Bringing more attention to discussing supply chain transparency during annual business reviews

with suppliers

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

Adding a survey for new vendors to complete regarding supply chain transparency before

beginning to do business with them.

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

Below is content from our employee handbook.

Hours of Work

Our standard office and warehouse work week is eight (8) hours per day, forty (40) hours per week. Staff work an eight hour day and the work week is Monday to Saturday. Scheduling of employee work hours, lunch and coffee breaks is done by the supervisor. Hours of business vary by location and are set to best serve our customers.

Discrimination

The Company prohibits unreasonable discrimination in the provision of services and in any aspect of employment in hiring, training, promotion and termination.

Discrimination is differential treatment of an individual based upon their membership in a particular group (real or perceived), rather than on their personal merit. Discrimination also includes the failure to reasonably accommodate the special needs of an individual or group whose special needs are based on any of the characteristics mentioned below unless the accommodation would create an undue hardship for the company.

Unreasonable discrimination is prohibited on the basis of the following characteristics:

- ancestry, including colour and perceived race
- ethnic background or origin
- religion or creed, or religious belief, religious association or religious activity
- age
- gender, including pregnancy, the possibility of pregnancy, or circumstances related to pregnancy
- gender-determined characteristics or circumstances
- sexual orientation
- marital or family status
- source of income
- political belief, political association or political activity
- physical or mental disability

If you believe you have been discriminated against, bring it to the attention of a manager. Your complaint will be kept as confidential as is possible, and will be dealt with promptly.

Harassment Prevention Policy

The Company is committed to providing a safe and respectful work environment for all staff and customers. No one, whether manager, employee, customer, or member of the public, should tolerate harassment at work for any reason, at any time. Furthermore, no one has the right to harass anyone at work or in any employment situation. Management will ensure, as much as is reasonably practical, that no employee is subjected to harassment in the workplace.

"Harassment" means any objectionable conduct, comment or display, directed at an employee, made on the basis of race, creed, religion, colour, gender, sexual orientation, marital status, family status, disability, physical size, weight, age, nationality, ancestry or place of origin, or which creates a risk to the health of the employee. Harassment is any behaviour that degrades, demeans, humiliates, or embarrasses a person, and that a reasonable person should have known would be unwelcome. It includes actions (eg., touching, pushing), comments (eg., jokes, name calling) or displays (eg., pictures, posters, cartoons).

"Sexual harassment" includes offensive or humiliating behaviour based on a person's gender; behaviour of a sexual nature that creates an intimidating, hostile or poisoned work environment; or behaviour that could reasonably be thought to put sexual conditions on a person's job or job opportunities.

Management will take corrective action with anyone under their direction who subjects an employee to harassment. Management will not disclose the name of a complainant or an alleged harasser or the circumstances of the complaint to anyone except where disclosure is necessary to investigate the complaint or take corrective action, or is required by law.

If you believe you've been harassed, you are encouraged to immediately tell the harasser to stop. If the harasser continues or if you choose not to confront the harasser, tell your supervisor or another member of management. The complaint will be investigated as quickly and as confidentially as possible. We will let both parties to any complaint know the outcome of any investigation.

If the evidence supports the complaint, we will do whatever is necessary to stop the harassment, and if appropriate, discipline the harasser. If the evidence does not support the complaint, no repercussions will occur for the person filing the complaint if the complaint was filed in good faith.

The Company's harassment prevention policy is not intended to discourage or prevent complainants from exercising other legal rights under any other law. Employees have a right to file a complaint with their provincial Human Rights Commission.

Wage and Salary Policy

The policy of the company is to pay wages and salaries to its employees in a competitive and equitable manner in order to attract and retain the most capable employees. Our company meets or exceeds minimum wage laws. Employee compensation is a private matter between the company and the employee and must be kept strictly confidential.

Salaries will be reviewed on an annual basis, typically in June and July.

Safety

The company has a strict policy of observing all government workplace safety regulations. All employees must follow safety rules at all times. Ignoring or violating safety rules will result in disciplinary action. Only employees who are properly trained, experienced and authorized are to operate powered equipment. Any hazardous materials are to be handled and stored in the manner approved for each particular material, used properly at all times and disposed of correctly and safely. If you have safety concerns, you are expected to bring them to management's attention immediately.

As with all safety matters, we consider fire prevention to be everyone's responsibility. You are expected to report any potential fire hazards to your supervisor or management. Violations of fire safety rules or regulations may result in disciplinary action. You are to familiarize yourself with fire procedures and the location of emergency exits.

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

N/A

Subcontractor and Suppliers Involved in Goods or Services

ARTCRAFT LIGHTING
BETHEL INTERNATIONAL
BROAN NUTONE
BULBRITE INDUSTRIES INC
CANARM
CAPITAL LIGHTING
Craftmade (Litex)
CRYSTAL WORLD
DAINOLITE
DALS LIGHTING INC.
DOMINION VENTURES LIGHTING
EGLO LIGHTING
ET2 LIGHTING
EUROFASE
GENERATION LIGHTING
Grand Total
Hinkley Lighting Inc
Hudson Valley Lighting
KALCO LIGHTING
Kendal Lighting Inc
Kichler Lighting
Kuzco Lighting
Leviton Mfg
MATTEO LIGHTING
MAXILITE
MISC CHARGE
MODERN FORMS OF WAC LIGHTING
ORTECH INDUSTRIES
PROGRESS LIGHTING
Quoizel Inc
Russell Lighting
SATCO & NUVO LTGPARTSBULBS
SAVOY HOUSE
Sea Gull Lighting
Standard Products Inc.
TECH LIGHTING (VC Modern)
Uttermost
VC Signature
W.A.C. Lighting
Z-LITE JENAMEES INC

Safety

SCMi is committed to ensuring the health and safety of not only our employees, but of all workers who may be affected by our day-to-day operations.

We are committed to taking all practical measures to ensure no current or prospective employee endangers their own safety, that of their co-workers, or members of the public due to lack of training, improper attitude, or physical or other limitations. Prospective employees will therefore be thoroughly assessed prior to being hired.

All workers in Manitoba have the following four (4) rights:

1. The right to participate in the safety and health program at the company;
2. The right to know the hazards associated with the work they do;
3. The right to refuse unsafe work; and
4. The right to be free of discrimination and reprisal for exercising these rights.

All SCMI employees will receive above adequate training on a continuing basis, both in job specific skills and in areas related to employee health and safety. An orientation and attendance at safety meetings are compulsory and part of our ongoing training policy.

Respectful Workplace Policy

SCMI is dedicated to promoting and maintaining a healthy workplace by creating an understanding with its employees of the expectations of behaviours that are appropriate. We recognize that at times conflicts and inappropriate behaviours may occur, and we will make every effort to prevent and resolve these issues in a way that contributes to a respectful workplace. All complaints will be treated with promptness, fairness, honesty and confidentiality. The process will be thorough, the relevant facts will be documented, and all parties involved will be advised of the decision as quickly as possible.

Noncompliance

SCMI will take appropriate disciplinary action, which may include dismissal, against any employee in the company who violates this policy. Complaints found to be false, frivolous, or made in bad faith will be subject to appropriate disciplinary action. All employees will be protected from any reprisals for reporting incidents of inappropriate behaviour, discrimination, or harassment. Retaliation by any person will not be tolerated and will be subject to disciplinary action.

Inappropriate Workplace Behaviour

Employees in our company are responsible for maintaining the highest standards of personal conduct and for ensuring other employees within the company are treated in the same manner. Inappropriate behaviour includes disrespectful behaviour, discrimination/harassment, and damage to people or property.

Disrespectful Behaviour

Disrespectful Behaviour includes:

- Conduct, comments, actions or gestures which are humiliating, offensive, hurtful or belittling;
- Aggressive or unwanted behaviour;
- Affecting the employee's dignity, wellbeing, or physical integrity;
- Resulting in a harmful or poisoned work environment.

Examples of disrespectful behaviour include, but are not limited to:

- Written or verbal comments, actions, gestures or other behaviours or "jokes" which are humiliating, offensive, hurtful or belittling;
- Bullying or intimidation;
- Abusing authority;
- Yelling or shouting (except where intended to alert another to danger);
- Deliberately excluding an employee from relevant work activities or decision making;
- Attempting to discredit an employee by spreading false information.

Discrimination/Harassment

The company supports each person's right to work in an environment free of discrimination or harassment because of race, ancestry, place of origin, ethnic origin, citizenship, religion, sex, gender identity, sexual orientation, age, historic criminal records, or any other status or condition protected by applicable federal or provincial laws, except where a bona fide occupational qualification applies. The company will not knowingly permit and will take reasonable steps to stop discrimination or harassment in any form. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Discrimination takes place when any employee in the company is denied opportunities for hiring, training, promotion or benefits for reasons related to the above and unrelated to ability and performance.

Harassment takes place when any objectionable conduct, unacceptable comments, or displays occur. Unacceptable conduct can refer to a number of situations, including:

- Unwanted advances
- Suggestive or aggressive remarks
- Racial or ethnic slurs
- Personal practical jokes
- Actions which result in discomfort

Sexual harassment is defined as unwanted sexual advances, requests, comments or visual, verbal or physical conduct of a sexual nature. This includes displays of pornographic or other sexual materials in the form of pictures, electronic mail, or sayings.

If you are being harassed, the first thing to do is tell the individual harassing you to stop if you feel comfortable doing so; you can do this in person or in writing. If you feel unable to deal with him/her directly, speak to your supervisor or management.

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: SCMI

Contact person and their position: Paul Neufeld/ President

Address of the supplier: 671 Discovery Drive Grande Pointe Mb

Nature of business: Mechanical Contractor

Number of years in operation: 23

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

Lennox, Tradesmen, Emco, BA Robinson, Shubert Concrete Coring

How do you ensure transparency and traceability throughout your supply chain?

We only work with well known, local suppliers that fall under the Manitoba construction minimum

wage act

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

Not with our suppliers and our sub-contractor only needs to show proof of liability insurance and

WCB status.

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

They are required to follow the Manitoba construction minimum wage act

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

We can confirm that.

How do you ensure that your employees and those of your subcontractors are of legal working age?

All SCMI employees go through a screening process that includes a criminal check and drivers

abstract. Through this process we are confident in their identity and age.

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

SCMI is committed to providing its employees with a safe environment. Our annual CSAM audits

score nearly 100% every year. Our employees' physical, mental and emotional safety is included in

this scoring.

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

SCMI meets or exceeds the Manitoba Construction Minimum Wage Act, which sets the parameters

of wage expectations and hours worked. Our high marks with CSAM proves our commitment to

safety.

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

All our supervisors and site foremen must complete the BST course at WCA, and one of the

courses is on Construction Industry ethics and speaks specifically to this. This designation is

mandatory to becoming a leader at SCMI.

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

We have a full time safety and HR person on staff who stays up to date with legislation and ensures compliance.

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

No

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

We would only have our WCB clearance documentation and CSAM audit reports.

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

This is laid out in the Manitoba Employment Standard, which we follow.

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

This is not something we have had to deal with, but if we did we would engage with a professional consultant proficient in that situation.

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

Yes

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

We are at the leading edge of this in our industry and continually stay updated with current standards and trends.

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

We feel our due diligence process is robust and verifies the accuracy of each person's identity.

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

Please find attached a clip from the SCMI handbook. All SCMI employees agree to and sign this, committing to all of our policies.

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

SCMI strongly supports the Joy Smith Foundation and its fight against human trafficking.

You are welcome to contact them for confirmation.

201 Portage Ave, 18th Floor
Winnipeg, MB R3B 3K6 204-691-2455

info@joysmithfoundation.com

Subcontractor and Suppliers Involved in Goods or Services

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. **General Information:**

- Name of the supplier: Southside Electric
- Contact person and their position: Jason Geddes President
- Address of the supplier: 25-1051 Kapelus Dr West St. Paul MB
- Nature of business: Electrical contractor
- Number of years in operation: 40

2. **Supply Chain Transparency:**

- Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.
Ecol, Gescan, Superlight
- How do you ensure transparency and traceability throughout your supply chain?
I use only legitimate long time suppliers. Canadian, American or local. No new or foreign companys.
- Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.
No
- Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.
Yes, All MB business's must follow provincial labor laws

3. Labour Practices:

- Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

No, The electrical panels and breakers are assembled in Mexico. All lighting product comes from China

- How do you ensure that your employees and those of your subcontractors are of legal working age?

All electrical apprentices and Jomeypersons must provide a copy of their grade 12 deploma. I don't use any subcontractors

- What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Southside electric is a COR certified company with all up to date exploitation, discrimination, and harassment policies as per the Manitoba labor law supplement.

- Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

Yes, We follow provincial pay rates and work a 40hrs week. We are also a COR safety certified company in good standing and a long time member of the Manitoba Better Business Bureau

- Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

Yes, It is part of our safety program and is reviewed with the employee during their new hire orintation

4. Monitoring and Compliance:

- How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

I keep up to date with all current labor and human rights laws in Manitoba. We conduct an annual COR audit ourselves and pay a third party inspector every 3 years to audit our safety program for compliance

- Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

There has been no instances that I am aware of. I do not know what happens in other countries where some of the material, light fixtures come from

- Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

Yes, COR certification, Better Business Bureau , WCB

5. **Reporting and Remediation:**

- What processes do you have in place for reporting and addressing grievances related to labour rights violations?

We have policies and procedures as outlined in our Safety manual

- How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

We have policies and procedures as outlined in our safety manual. I do not know about the supply chain

- Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

Yes, for sure.

6. **Future Commitments:**

- What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

I plan on continuing to maintain good standing with COR, BBB, WCB .

- Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

Not at this time, I feel my company is already preventing modern slavery. The supply chain is out of my control however I feel that I have choosen quality Local, Canadian and American suppliers

7. Documentation and References:

- Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

Yes, please see attached. COR, BBB, WCB

- Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

Apprenticeship board of Manitoba- for the apprentices, Office of the Fire Commissioner- for the journeypersons

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: Springfield Woodworking Ltd.
Contact person and their position: John Pauls / Sales Representative
Address of the supplier: #1 - 5 Penner
Nature of business: Cabinetry
Number of years in operation: 20 +

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

N/A

How do you ensure transparency and traceability throughout your supply chain?

N/A

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

N/A

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

Yes

How do you ensure that your employees and those of your subcontractors are of legal working age?

Birth Certificate

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Disciplinary Action when Required

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

Company Policies as Per Manitoba Labor

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

N/A

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

N/A

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

N/A

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

N/A

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

N/A

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

N/A

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

Subcontractor and Suppliers Involved in Goods or Services

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: Springhill Lumber Wholesale Ltd.

Contact person and their position: M. Price, CFO

Address of the supplier: 520 Caron Road

Nature of business: Building material supplier

Number of years in operation: 37

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

Too long to list

How do you ensure transparency and traceability throughout your supply chain?

Deal with mainly reputable Canadian suppliers

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

No

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

All required to adhere to governing laws, as applicable

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

Yes, all are employed by free will and are compensated in accordance with labour law standards

How do you ensure that your employees and those of your subcontractors are of legal working age?

Hiring practices dictate that persons are eligible to work in Canada prior to employment

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Can't prevent it, however company policies pertaining to subject matter is provided and all employees sign off making them aware of respective policies.

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

Yes

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

No specific training, but policies are provided and available for review.

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

Management & HR deal with any issues should they arise within the organization

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken.

No

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

No

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

Policies such as Whistleblower assist in identifying any issues

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

If identified, we would discontinue a business relationship until remediation occurred

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

Yes

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?

Continued discussions, buying group to assist in oversight with vendors

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

No

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

None to provide

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

No

Subcontractor and Suppliers Involved in Goods or Services

CODE OF VENDOR CONDUCT

Approved by the board of directors of LFL Furniture Limited on: February 27, 2019

Leon's Furniture Limited and all retail banners operating under LFL, including but not limited to: Leon's; The Brick; The Brick Mattress Stores; The Brick Commercial Sales; MidNorthern Appliance; and Appliance Canada (collectively, "LFL" or the "Company") is committed to conducting its business in accordance with a high standard of business ethics and in compliance with all applicable laws. LFL expects its vendors to do the same. Moreover, LFL conducts its business with a regard for human rights and seeks vendors that have a similar reputation and standards.

While LFL recognizes that different cultural, legal and ethical systems exist in the countries in which LFL purchases merchandise, this LFL Code of Vendor Conduct applies to all vendors that provide goods and/or services to the Company and all their places of doing business, regardless of domicile.

Each vendor is required to sign a Vendor Buying Agreement at the beginning of its relationship with LFL, or upon renewal of existing contracts, which incorporates the Code of Vendor Conduct, by reference. All vendors are required to review the Code of Vendor Conduct and agree to abide by its terms as a condition of doing business with LFL. Vendors are responsible to ensure the compliance of their employees and suppliers with this Code of Vendor Conduct for the duration of the relationship with LFL. Vendors will be asked to certify compliance with the Code of Vendor Conduct every two years and are subject to on-site compliance review by LFL and/or its contracted agents. Vendors will report any existing or potential non-compliance with this Code of Vendor Conduct to the Company.

Compliance with the Law and Code of Vendor Conduct. This Code of Vendor Conduct sets out specific standards for: quality; safety; labour standards; environmental and ethical business practices. Vendors will carry on their businesses with integrity and will comply with all applicable laws and regulations and this Vendor Code of Conduct. The Company will not knowingly engage with any Vendor that does not conform to the requirements of applicable laws and regulations and the key requirements of the Code of Vendor Conduct.

Safety and Health. Conditions in all work and residential facilities must be safe, clean and consistent with industry standards, all applicable laws and regulations and the provisions of this Code of Vendor Conduct

Child Labor. Vendors must be in compliance with all standards and requirements relating to child labour set or recommended from time to time by the International Labour Organization.

Forced Labour. The use of forced or compulsory labour is unacceptable. Employment must be voluntary and free of any financial penalties or coercion.

Harassment or Abuse. Disciplinary practices must be fair and workers must be treated with respect and dignity. Factory and corporate policies shall ensure that no worker is subject to any physical, sexual, psychological, or verbal harassment or abuse.

Discrimination. Employees are expected to be hired based on merit. Cultural differences, personal characteristics and beliefs must be respected. Discrimination in employment, including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination, or retirement on the basis of gender, race, ethnicity, social origin, religion, age, disability, sexual orientation, national origin is prohibited and victims have recourse through accessible legal means.

Working Hours. Except in extraordinary business circumstances, workers shall not be required to work more than the legally prescribed weekly hour limitation, and vendors shall operate within International Labour Organization standards and guidance. Vendors shall comply with applicable local laws that entitle workers to vacation time, leave periods, holidays and overtime pay.

Wages and Benefits. Wages are essential for meeting the basic needs of workers. Vendors shall compensate their workers by providing wages and benefits that satisfy all applicable laws and regulations.

Freedom of Association. Vendors shall comply with all applicable laws regarding freedom of association and assembly of employees, and with all applicable collective bargaining agreements.

Whistleblowing and Non-Retaliation. Vendors shall have in place policies and procedures to protect the confidentiality and anonymity of whistleblowers, and to allow employees to raise issues, ideas and concerns, and to report any actual or suspected misconduct without any fear of retaliation or reprisal.

Environmental Compliance. At a minimum, Vendors must comply with all local laws protecting the environment. LFL encourages its Vendors to conduct business to minimize the impact on the environment, including reducing waste and maximizing recycling initiatives.

Anti-Corruption. All vendors are required to comply with all applicable anti-corruption laws, including the *Corruption of Foreign Public Officials Act* (Canada). LFL has a zero-tolerance policy for practices that reward or otherwise encourage non-compliance with such applicable laws and regulations.

Money Laundering. All Vendors shall not engage in the financing of terrorism or money laundering activities, and will comply with all applicable laws, accounting standards and banking requirements related to fraud, terrorism financing and money laundering.

Conflicts of Interest. LFL employees owe a duty of loyalty to the Company and are bound by a Code of Conduct and Code of Ethics which requires them to avoid placing themselves in a situation of conflict of interest, actual or apparent. Consequently, employees must not be put in a position where personal, political, or financial incentives or interests may impair their judgment and ability to make sound and unbiased business decisions in the best interest of LFL. We expect vendors who do business or seek to do business with LFL to respect these ethical principles and to not offer business courtesies (such as gifts and entertainment) that exceed nominal value.

Confidentiality. Vendors must hold all confidential information regarding LFL which may be communicated to them or to which they may have access in strict confidence and are also expected to take reasonable means to protect such information. Confidential information includes all non-public

information about LFL. Vendors may not disclose, share or use this information other than for the benefit of LFL and as outlined in the Vendor Buying Agreement. The vendor will not disclose the terms of the vendor's supply of products to LFL and shall not make use of its association with LFL for publicity, advertising, marketing or other purposes without the prior written consent of LFL, which may be withheld in LFL sole and unfettered discretion.

Notice and Record Keeping. Vendors are expected to ensure that the standards outlined in the Code of Vendor Conduct are communicated, understood and implemented within their organization. LFL reserves the right to assess and monitor vendor compliance with these standards. To this end, LFL requires vendors to post this Code of Vendor Conduct in a location accessible to their workers (in the appropriate local language) and to grant LFL and/or its designated agent with unrestricted access to facilities, records and workers for inspection purposes. Workers must be protected from any form of retaliation based on disclosures made to LFL to assess compliance with the Code of Vendor Conduct, in accordance with LFL policies protecting whistleblowers. The identity of whistleblowers is protected under LFL's policies. Vendors must maintain current sufficiently detailed records to enable LFL to determine their compliance with this Code of Vendor Conduct, and make these records available to LFL representatives upon request.

Violations. If LFL determines that a vendor has violated the Code of Vendor Conduct, the vendor will be required to propose and implement a corrective action plan to bring its business up to LFL standards within a reasonable timeframe. LFL also reserves the right to cancel purchase orders, to terminate the relationship with a vendor who is unwilling or unable to comply with the Code of Vendor Conduct or to remediate a situation of non-compliance within a reasonable timeframe, or to terminate the relationship immediately in case of serious violation or gross negligence.

LFL employees in the supply chain are made aware of the LFL policies dealing with whistleblowing which allows direct access to legal, which is subject to confidentiality and legal privilege, and the Audit Committee of LFL.

To report suspected violations of this Policy, contact LFL at:

*Mr. Peter B. Eby Chair, Audit Committee
c/o Leon's Furniture Limited
45 Gordon Mackay Rd., Toronto, Ontario M9N 3X3*

Please provide your responses to the following questions and, if necessary, append a schedule where required.

1. General Information:

Name of the Trade / Supplier: Springhill Lumber Wholesale Ltd.

Contact person and their position: Don Henzel

Address of the supplier: 520 Caron Road , Headingley, Manitoba

Nature of business: Building Supply

Number of years in operation: approximately 50 years

2. Supply Chain Transparency:

Please provide a list of all your subcontractors and suppliers involved in providing goods or services to our company.

Lumber, plywood, OSB mills produced here in Canada, IKO Industries, Jeld-wen Windows, Johns

Manville insulation, Masonite of Canada, All weather windows, Building Products of

Canada, Weiser locks, Alliance Door Products, Mirolin, Taymor Industries,

How do you ensure transparency and traceability throughout your supply chain?

Our supply chain is managed by our purchasing department who ensure the supply is from

compliant companies.

Do you conduct audits or assessments of your suppliers to ensure compliance with labour standards? If yes, please describe the process.

Are your subcontractors and suppliers required to adhere to any labour standards or codes of conduct? If so, please provide details.

3. Labour Practices:

Can you confirm that all workers within your organization and your supply chain are employed voluntarily and are not subject to any form of forced labour or human trafficking?

Yes all are employed voluntarily

How do you ensure that your employees and those of your subcontractors are of legal working age?

Our HR department ensures that everyone is of legal working age.

What measures do you have in place to prevent exploitation, discrimination, harassment, and abuse of workers within your organization and supply chain?

Through our HR department

Do you have policies in place to ensure fair wages, reasonable working hours, and safe working conditions for all workers?

Yes we pay fair wages and reasonable working hours.

Do you provide training to your employees and subcontractors regarding human rights, labour standards, and ethical business practices?

4. Monitoring and Compliance:

How do you monitor and assess compliance with labour standards and human rights within your organization and supply chain?

Human resource department

Have there been any instances of non-compliance with labour standards or allegations of forced labour or human trafficking within your organization or supply chain? If yes, please provide details and actions taken. no there has not been

Can you provide any certifications, accreditations, or audit reports that demonstrate your compliance with labour standards and ethical business practices?

5. Reporting and Remediation:

What processes do you have in place for reporting and addressing grievances related to labour rights violations?

Human Resource department and through our health care

How do you ensure remediation for any identified labour rights violations within your organization or supply chain?

Are you committed to cooperating with our company in investigations related to labour rights violations or suspected instances of modern slavery within your organization or supply chain?

6. Future Commitments:

What steps are you planning to take to further enhance transparency and ensure compliance with labour standards and ethical business practices in the future?we have reached out to our buying group to make sure during negotiations that we are all compliant.

Are there any additional measures or policies you are considering implementing to prevent modern slavery within your organization and supply chain?

7. Documentation and References:

Please provide any relevant documentation, such as policies, procedures, or reports, related to labour standards and ethical business practices.

Can you provide references from other companies or organizations that can attest to your commitment to preventing modern slavery and ensuring ethical sourcing practices?

Subcontractor and Suppliers Involved in Goods or Services

RONA Group

2023 REPORT UNDER *THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT*

1 Introduction

This report constitutes the first report prepared by the RONA Group (defined below) pursuant to Canada's new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"). It is a joint report ("**Report**") made by RONA inc. ("**RONA**") and SP RNA Holdings LLC ("**Holdco**") for the financial year ended February 2, 2024 (the "**Reporting Period**").

This Report relates to the steps taken by the RONA Group to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by RONA, Holdco or their controlled subsidiaries, to the extent applicable, other than ZyTech Building Systems LP (collectively, the "**RONA Group**", "**our**", "**us**", or "**we**"). ZyTech is filing a separate report under the Act.

2 Steps taken to prevent and reduce the risk of forced labour and child labour

In general terms, the RONA Group took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in its business and supply chains:

- updated the mapping of our tier 1 suppliers;
- continued the Responsible Sourcing Program, administered through Lowe's Companies, Inc. ("**Lowe's**"), based on an initial internal assessment of risks of forced labour and/or child labour in our supply chains that relies on:
 - Lowe's conducting several audits of tier 1 suppliers outside of Canada and the United States; and
 - Lowe's action plan for addressing forced labour and/or child labour in the event that any instances of the same are found in our supply chains;
- updated the Vendor Code of Conduct, which sets out the expectation that the use of forced labour and child labour by our vendors is prohibited and provides a confidential reporting mechanism in respect of any violations, and required all new suppliers to comply with the Code;
- updated a grievance mechanism for which violations of the Vendor Code of Conduct can be reported on a confidential basis;
- updated the Human Rights Policy, which sets out the expectation that contractors, subcontractors, suppliers, vendors and other partners adhere to the Vendor Code of Conduct, which prohibits the use of human trafficking, forced labour and child labour;
- implemented, through Lowe's on RONA's behalf, procedures to track performance in addressing forced labour and/or child labour; and
- engaged external counsel to provide training on the issues of forced labour and child labour and the requirements of the Act for the RONA supply chain, legal, procurement, global sourcing, sustainable development, and quality assurance management teams.

Details on the foregoing are set out in further detail in this Report.

3 Structure, activities, and supply chains

Structure

Founded in 1939 in Boucherville, Québec, RONA helps Canadians achieve their construction and home improvement projects by offering a wide selection of products and services. As at the end of the Reporting Period, the RONA Group has a network of 417 corporate and dealer-owned stores across Canada, 201 of which are independent dealer-owned stores.

RONA is incorporated under the *Business Corporations Act* of Québec. It is a wholly owned subsidiary of Holdco, a holding company incorporated under the laws of Delaware.

As of the end of the Reporting Period, the RONA Group has a network of 19,282 full- and part-time employees, all of whom are located in Canada.

Activities

RONA operates as retailers and wholesalers of hardware, construction and home improvement products and services, and offers products online to customers in Canada. As a holding company, Holdco is not itself involved in any retail or wholesale activities.

During the Reporting Period, RONA operated under five distinctive banners to meet the needs of retail consumers and contractors in Canada:

- **Lowe's**: a home improvement retailer carrying thousands of products covering every area of home improvement from hardware to appliances. Lowe's also carries seasonal and decor items. All of Lowe's big box locations were converted to RONA+ at the end of February 2024;
- **RONA+**: launched during the summer of 2023 to offer DIYers and decorators, as well as Pro customers, thousands of low prices, amazing product designs, flexible payment options, as well as in-store expert advice;
- **RONA**: provides Canadians with products and expert advice to help them achieve their home improvement projects since 1939. RONA sells a wide selection of building materials and hardware supplies;
- **Réno-Dépôt**: founded in 1993 to offer the big box home improvement store model in Québec; and
- **Dick's Lumber**: provides lumber and building materials to DIYers and contractors of British Columbia and Alberta since 1964.

In addition, RONA operates eight distribution centres located in Alberta, Ontario and Québec that carry hardware, lumber and building materials. The RONA Group distributes products from each of the distribution centres to RONA's stores, clients and RONA's independent dealer-owned stores, all of which are located in Canada, with the exception of one dealer-owned store located offshore of Canada on the island of Saint-Pierre and Miquelon. While RONA supplies goods to dealer-owned stores, they are independently owned and operated and may also engage in their own procurement activities.

RONA is the importer of record in Canada for a variety of goods that it imports for resale, including household appliances, building materials, seasonal and decorative items, flooring and electrical hardware, heating, lighting, plumbing and cooling equipment.

Supply chains

The RONA Group supply chains are complex and global. RONA sources goods for both products for resale and goods and services not for resale from suppliers across various industries. During the Reporting Period, we offered approximately 350,000 different products in stores and online.

The primary categories of goods sold by the RONA Group are:

- home hardware, appliances, furnishings and décor
- lumber, construction supplies and tools
- kitchen and bath products
- garden and patio tools and furnishings
- gardening and landscaping supplies; and
- seasonal and décor items.

We source the majority of these products from Canadian product suppliers, with close to 90% of our direct suppliers being located within Canada and 95% within Canada and the U.S. Other products are imported by RONA from regions in Asia.

In addition to products, most stores in the RONA network offer home installation services. A selection of install service categories is offered such as roofing, fashion plumbing, bathrooms, kitchens, countertops, flooring, woodwork, water heaters, heating, ventilation, air conditioning, as well as appliances.

To support our corporate and independent dealer-owned stores, the RONA Group has goods and services suppliers in the following categories: professional services, office space management, information and communications technology, marketing, logistics, corporate travel and office supplies.

4 Policies and due diligence processes

Policies¹

The RONA Group aims to reduce the risk of forced labour and child labour in its activities and supply chains through a number of policies.

(a) Code of Ethics and Conduct

The RONA Group's Code of Ethics and Conduct (the "**Code**") applies to all employees and directors of RONA and its subsidiaries.

The Code sets forth the RONA Group's policies and procedures in areas of key legal and ethical importance. It sets out expectations for compliance with all laws, regulations and its own policies and procedures, at all times, and outlines the RONA Group's commitment to workplace safety and to maintaining a violence-free work environment. Any violations of the Code must be reported to the legal compliance team by email.

The Code reiterates the RONA Group's commitment to conducting business in an ethical and responsible manner. This commitment also extends to the companies that choose to partner with a member of the RONA Group. In accordance with the Code, when a company offers products subsequently sold by a

¹ The below-listed policies apply to all entities and banners within the RONA Group other than (i) Dick's Lumber which, in addition to shared suppliers with the RONA Group, also has its own vendors (which are located solely in Canada and the United States); (ii) Holdco, which is a holding company with no retail or procurement activities; and (iii) ZyTech Building Systems LP, which is filing a separate modern slavery report.

member of the RONA Group or services to help a member of the RONA Group achieve its goals, the Code sets out that the supplier is expected to always do so in a legal, ethical and responsible manner.

(b) *Vendor Code of Conduct*

The RONA Group's Vendor Code of Conduct (the "**Vendor Code**") applies to all vendors who provide goods and services to RONA, or to any of its subsidiaries, affiliates, and allied businesses. The Vendor Code sets out the expectations of the RONA Group for vendors to commit to a high standard of ethical conduct in their business practices.

The Vendor Code sets out the following expectations for vendors when engaging in its business dealings with us:

- to not use any form of forced, bonded, indentured, trafficked, slave, or prison labour;
- that all work must be voluntary, and workers shall be free to leave work or to terminate their employment;
- to not require workers to surrender any government-issued identification, passport, or work permit as a condition of employment;
- to strictly prohibit child labour;
- to hire workers who meet at least the legally specified minimum age for employment, or the minimum age for completing compulsory education in the country where any product is manufactured or where any service is rendered, whichever is higher and that no worker may be hired under the age of 15;
- to ensure that any of their subcontractors comply with the Vendor Code in connection with providing goods or services to the RONA Group, and to not retain any subcontractor that fails to comply with the Vendor Code; and
- to implement management systems that facilitate compliance with the Vendor Code and any applicable laws and regulations, identify and mitigate risks relating forced labour and child labour, and which facilitate continuous improvement.

Furthermore, the Vendor Code sets out the expectation that vendors create programs to ensure the protection of worker whistleblower confidentiality and to prohibit retaliation against workers who participate in such programs in good faith, or who refuse an order that violates the Vendor Code. It also sets out the expectation of the RONA Group that all vendors provide a complaint mechanism for workers to report any workplace grievances or Vendor Code violations in accordance with any applicable laws and regulations.

If a vendor does not comply with the expectations set out in the Vendor Code, RONA reserves the right to terminate its business relationship with the vendor.

(c) *Human Rights Policy*

The Human Rights Policy reiterates the RONA Group's commitment to upholding and promoting human rights in all aspects of its business operations and creating a business that is free from discrimination, harassment, and any form of human rights violations towards our employees, contractors, subcontractors, suppliers, customers, vendors, visitors, consultants, service providers, and other partners, in accordance with the laws, regulations, and guiding principles with respect to such matters.

The Human Rights Policy Statement, which is also incorporated in the Vendor Code and provided to vendors, sets out the RONA Group's expectation that contractors, subcontractors, suppliers, vendors, and other partners treat workers throughout the supply chain with integrity and respect and adhere to the Vendor Code, which sets out the expectation that suppliers protect workers' human rights throughout the supply chain. The Human Rights Policy Statement reiterates the RONA Group's position that human trafficking, child labour, and forced labour are strictly prohibited.

Where any events may impact the RONA Group's commitments to human rights, we will assess the risk and provide a solution or action for remediation.

The RONA Group is committed to promptly and thoroughly investigating all complaints in a confidential and impartial manner. We expect our stakeholders to report and address any human rights concerns through email or telephone, as provided through our Human Rights Policy.

(d) Lowe's Responsible Sourcing Program

By virtue of an agreement with Lowe's, Lowe's performs certain due diligence activities for and on behalf of the RONA Group for its tier 1 suppliers. These activities include continuous monitoring and auditing activities under the Responsible Sourcing Program ("RSP") and related supplier factory audits.

The RSP details the various expectations related to the prohibition of forced labour and child labour by suppliers in their operations.

Through the RSP's Retail Ethical Sourcing Assessment ("RESA"), all RONA Group tier 1 suppliers outside of Canada and the United States are audited. RESA audits focus on forced labour, child labour, employee benefits and compensation, human rights, health and safety, record-keeping, environmental compliance, and management systems.

The RESA process includes onsite observations, interviews, and document reviews. Supplier factories are required to provide consistent, accurate and authentic records on a timely basis, and failure to comply with these requirements may result in delay of shipment, order cancellation or termination of the business relationship. Once the audit is complete, auditors send a comprehensive assessment report to the Lowe's RSP team with the detailed findings identified during the assessment.

5 Risks of forced labour and child labour in our operations and supply chains

(a) Operations

Given that our primary business operations are conducted in Canada, that the majority of our workforce is employed in Canada, several RONA Group stores have unionized employees, and that RONA has policies and procedures in place to help ensure compliance with all applicable laws, we consider the risk of forced labour and child labour occurring within our business operations to be low. Given that Holdco is a holding company and therefore does not have any employees or operations, we do not consider there to be any risks in its operations.

RONA inc. employs contractual workers in Canada, the U.S. and in other countries, including some who are located overseas and provide services such as accounting and information technology. While we recognize that there are known risks for workers providing contracted services, particularly where recruitment agencies are used, we consider these areas of skilled work as carrying a low risk of forced labour and child labour.

(b) Supply chains

During the Reporting Period, the RONA Group updated the mapping of our tier 1 suppliers. For our direct suppliers located in Canada and the United States, we consider the risk of forced labour and child labour to be low. Certain manufacturing regions and materials carry a higher risk of forced labour due to its prevalence in specific countries. As some of our direct suppliers are located outside Canada and the United States, we consider the risk to be higher, specifically as it relates to the production of raw materials and product manufacturing.

We understand that many of our direct suppliers rely on global supply chains to provide goods and services to us. While we have not mapped our supply chain beyond the first tier, RONA aims to do so as a next step of our assessment of risks.

6 Steps taken to assess and manage the risk of forced labour and child labour

The RONA Group is dedicated to fostering a safe work environment free of human rights violations. We have a comprehensive Code of Ethics and Conduct that outlines the expected behaviour of individuals doing work for us.

During the Reporting Period, Lowe's, on behalf of the RONA Group, conducted RESA through the RSP for our tier 1 suppliers located outside of Canada and the U.S. Lowe's RSP uses a risk-based approach to assess and manage the risk of forced labour and child labour. This approach helps to prioritize efforts and adjust actions accordingly.

While no instances of forced labour or child labour were identified during the Reporting Period, we have measures in place to mitigate against potential risks. For instance, pursuant to our Vendor Code, the RONA Group sets out the expectation that vendors should ensure that their subcontractors comply with the Vendor Code in connection with providing goods or services to the RONA Group, and should not retain any subcontractor that fails to comply with the Vendor Code.

In terms of compliance monitoring, Lowe's, on behalf of the RONA Group, conducts regular assessments on suppliers' factory compliance, and reviews the assessment results using RESA.

(a) Auditing suppliers

In accordance with the Vendor Code, the RONA Group, whether acting by itself or through a third party, may take affirmative measures such as inspections and audits to ensure supplier compliance with the Vendor Code, which includes measures against the use of forced labour and child labour. The auditing process actively engages suppliers with respect to forced labour and child labour risks.

The RONA Group, through Lowe's on RONA's behalf, engages with a third-party auditor to conduct audits of new suppliers outside of Canada and the U.S. and conducts follow-up audits on current suppliers.

(b) Contractual measures

The standard form contracts of the RONA Group set out the requirement that suppliers commit to adhering to the principles and standards in our Vendor Code and to requiring their own suppliers to commit to similar principles and standards as it relates to forced labour and child labour and human rights. In addition, through our standard form vendor contracts, vendors are required to implement management systems that facilitate compliance with the Vendor Code and any applicable laws and regulations, identify and mitigate risks relating forced labour and child labour, and which facilitate continuous improvement. The standard terms are not yet in place with all vendors.

The RONA Group reserves the right to discontinue business relationships in cases of non-compliance with the Vendor Code.

Furthermore, the standard vendor contract sets out the requirement that suppliers are required to maintain all documentation to demonstrate compliance with the Vendor Code and must make such documentation available to the RONA Group or an authorized third-party agent upon request.

7 Remediation measures

During the Reporting Period, the RONA Group has not identified nor received any reports of actual or suspected instances of forced labour or child labour in its operations or supply chains. As a result, we have not had to take any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families. However, if we identify any instances where we have caused or contributed to any form of forced labour or child labour, we have an action plan in place to conduct a corrective action plan, conduct a follow-up assessment based on the individual case and, depending on those results, remediate accordingly.

Through grievance mechanisms set out in our Code of Ethics, Vendor Code, Human Rights Policy, and Human Rights Policy Statement, we are committed to providing access to remedies. Employees and suppliers may report ethical or legal violations, including real or suspected instances of child labour and forced labour. Our Vendor Code provides an anonymous complaint mechanism for workers to report any workplace grievances or Vendor Code violations in accordance with any applicable laws and regulations, which suppliers can use to raise concerns. In accordance with our Human Rights Policy, RONA expects any stakeholders of RONA's business to report and address any human rights concerns through email or telephone.

Further, the Vendor Code sets out the requirement that suppliers create programs to ensure the protection of whistleblower confidentiality, and prohibit retaliation against workers who participate in such programs in good faith, or who refuse an order that violates the Vendor Code. Vendors are also required to provide a complaint mechanism for workers to report any workplace grievances or Vendor Code violations in accordance with any applicable laws and regulations.

8 Training

During the Reporting Period, RONA engaged external counsel to provide tailored training to supply chain, legal, procurement, global sourcing, sustainable development and quality assurance management teams. The training covered a range of topics including the purpose and scope of the Act, international human rights frameworks, statistics related to modern slavery, the meaning and indicators of forced labour and child labour and measures to prevent and reduce modern slavery risks in the supply chain, including an overview of RONA's governance framework and policies.

In addition, during the Reporting Period, the RONA Group provided regular training through Lowe's Responsible Sourcing Program to key vendors of imported products with respect to prohibitions on the use of forced labour and child labour, including awareness training on local modern slavery laws.

9 Assessing the effectiveness of our actions

RONA has in place a number of measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. During the Reporting Period, we have continued to assess the effectiveness of certain of our actions related tier 1 suppliers outside of Canada and the US by tracking results from our supplier RESA audits, which is completed by Lowe's on behalf of the RONA Group through the RSP's audit program. However, we have not yet taken other actions to assess the effectiveness of our actions more broadly.


10 Approval and attestation

This Report was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the boards of directors of RONA inc. and SP RNA Holdings LLC, respectively.

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 joint report for the entity specified below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this joint report is true, accurate and complete in all material respects, for the purposes of the Act, for the Reporting Period.

I make the above attestation in my capacity as a director of the board of directors of RONA inc. (the "**RONA Board**") for and on behalf of the RONA Board.

I have the authority to bind RONA inc.

Per:  _____
Full Name: Andrew Iacobucci
Director
Date: May 15, 2024

I make the above attestation in my capacity as a director of the board of directors of SP RNA Holdings LLC (the "**Holdco Board**") for and on behalf of the Holdco Board.

I have the authority to bind SP RNA Holdings LLC.

Per: *Christopher Copping* _____
Full Name: Christopher Copping
Director
Date: May 15, 2024