



*Forced Labour and Child Labour in the
Supply Chain Assessment 2023*

Alf Curtis Home Improvements Inc.

Forced Labour and Child Labour in the Supply Chain Assessment

Prepared for corporate year ending February 28th, 2024.



Introduction

Alf Curtis Home Improvements Inc. (“ACHI”) is committed to providing a safe workplace and operations. This includes an environment free from all forms of forced and child labour (as outlined by Ontario’s provincial employment standards including with regards to legal age) or other exploitative practices.

This report relates to the period running from March 1st, 2023, to February 28th, 2024. ACHI is filing this as a joint report, in conjunction with Peterborough Truss & Floor Ltd. (common controlling shareholder), as entities that are located in and conducting business within Canada (including importation, production, sale and distribution of goods within Canada) while meeting the minimum thresholds (combined) as outlined by the department of Public Safety Canada. This is an original report for the period described above. ACHI operates solely in Canada and therefore has no other reporting requirements in other jurisdictions with regards to forced and child labour.

Company Structure, Activities and Supply Chains

ACHI is a privately held Canadian Corporation (Business #100129618), headquartered in Peterborough Ontario, engaged in the business of selling building materials to contractors and for retail sales, and supply and install services for exterior projects (windows and doors, eavestrough, soffit and fascia, etc.). ACHI has a fiscal year ending February 28th.

ACHI exclusively serves the Canadian market through its 3 locations in Peterborough Ontario, Lindsay Ontario, and Quinte West Ontario. ACHI’s operations include construction, retail trade, transportation, and warehousing. ACHI sources product from both Canadian and American suppliers. A small quantity of goods are directly imported from the USA, but the majority are procured from Canadian suppliers. Goods provided from suppliers are primarily sourced from Canada, the USA, and from Asia (From Asia, China being most predominant).

ACHI is a member of Castle Building Centres Group Ltd., a Canadian buying group, which facilitates purchases through many vendors in Canada. A significant portion of products are sourced through this group.

Policies and Due Diligence Processes

External policies and due diligence processes directly relating to forced and/or child labour in the supply chain have not been enacted as of February 28th, 2024. ACHI will continue to work towards development of policies to support the objective of a forced and child labour free supply chain.

Internally, ACHI confirms all employees are of legal age, legally able to work in Canada, and employed of their own volition as a part of its standard hiring practices.

ACHI maintains a strict policy on workplace violence and harassment prevention. Per this policy all employees have the right to equal treatment free of discrimination and harassment including physical, sexual and psychological harassment, and outlines ACHI's responsibilities in ensuring this. This policy is made available in a centrally accessible area and is also signed by employees during onboarding.

ACHI follows provincial labour laws as outlined in the Ontario Employment Standards Act, 2000, including guidance to wages, hours of work, and overtime.

Forced Labour and Child Labour Risks

Canada and the United States are considered relatively low risk for forced and child labour in the supply chain per Walk Free's Global Slavery Index (GSI). ACHI predominantly provides finished goods for sale to contractors and retail consumers, and these are sourced from Canadian and US suppliers.

ACHI sells building materials as well as finished hardware goods for retail sale. Most building materials are not considered to be of higher risk. These goods are typically produced within Canada and the US. While timber globally carries risk (per Walk Free's GSI), Canada is a major producer of lumber, rather than an importer, and ACHI's vendors source their lumber within Canada where risk is lower. ACHI also offers installation services for these products.

In addition to building materials, ACHI sells retail hardware goods, some of which are more frequently initially produced from global sources outside North America and could potentially present greater risk when compared to building materials. These may include goods produced in higher risk countries such as in Asia, or certain types of goods such as battery-operated products, where raw materials for the batteries may contain high risk minerals. ACHI has not identified any evidence of forced and/or child labour in its supply chain.



Remediation Measures

ACHI has not identified and has no reason to suspect any forced and/or child labour in its activities or its supply chain to warrant any remediation measures. Should they be identified, ACHI would evaluate the nature and determine any steps required to ameliorate the situation.

Remediation of loss of income

No loss of income in vulnerable families has been identified or suspected in ACHI's activities or supply chains and so no measures have been deemed necessary or undertaken in this regard.

Training

ACHI does not currently have any specific training policies in place regarding forced and/or child labour in the supply chain. Within ACHI, employees are made aware of their rights and obligations towards a safe, violence and harassment (including coercion) free environment. Employees are to review the company health and safety policies and procedures, workplace violence and harassment prevention policies. All employees are expected to read and understand the contents of these documents. This is to occur during orientation/onboarding and on a recurring basis thereafter.

ACHI recognizes there are further opportunities to enact specific training modules on forced and child labour in the supply chain and will assess them on an ongoing basis.

Assessing Effectiveness

ACHI does not currently have any direct external assessment procedures in place to assess effectiveness in ensuring that forced and/or child labour are not being used in the supply chains.

Internally, ACHI's standard hiring practices and workplace policies (and their review), ensure ACHI's workforce remains child and forced labour free.



Attestation

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

I have the authority to bind Alf Curtis Home Improvements Inc.

A handwritten signature in blue ink, appearing to read "Brent Perry", written in a cursive style.

Brent J. C. Perry

President

Alf Curtis Home Improvements Inc.

May 15th, 2024