

May 28, 2024

To: Public Safety Canada

Re: Bill S-211 Summary report

### Introduction

This report has been prepared by Alliston at Home Inc. (Business Number: 750143885) in accordance with Section 11 of Bill S-211 for the financial year ending December 31, 2023. Alliston at Home Inc. qualifies as a Reporting Entity under the Act, having a place of business in Canada, conducting business activities within Canada, and meeting the specified revenue and asset thresholds. Alliston at Home Inc. is dedicated to maintaining our principles of honesty and integrity in all our operations. We are committed to providing our customers with high-quality products. Historically, there have been no indications of modern slavery risks within our operations and supply chain. However, we recognize the global urgency to eradicate child labour and forced labour. In compliance with Section 11 of Bill S-211, this report details the steps Alliston at Home Inc. has taken to mitigate modern slavery risks and outlines ways we may strengthen these measures in the future.

### Section A: Legal and Organizational Structure

Alliston at Home Inc., a privately held corporation, has over 40 years of experience in constructing single-family and multi-family projects throughout Alberta. We build homes on real property and sell them to arm's-length purchasers. All construction activities, except for supervision and management, are contracted out by Alliston at Home Inc. Our supply chain, based entirely in Canada, is primarily composed of building materials. Operating with a fully Canadian-based supply chain minimizes our exposure to the risks of forced or child labour, thereby allowing us to consistently deliver high-quality and ethical products to our customers.

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## **Section B: Policies and Due Diligence Processes**

To date, Alliston at Home Inc. has not identified any incidents of child labour or forced labour within our operations or supply chains. We continue to uphold a firm commitment to adhere to all relevant laws and regulations. Our suppliers are exclusively Canadian, leading us to evaluate the risk of modern slavery within our operations and supply chains as low because of Canada's strict laws and regulations surrounding ethical business conduct. Consequently, we did not implement formal policies or due diligence processes aimed at combating forced or child labour during the last fiscal year. Nonetheless, we acknowledge the critical importance of ethical and responsible conduct in our business dealings. We remain alert and ready to modify our policies and procedures if significant changes in our supplier portfolio lead to a change in our risk profile.

## **Section C: Forced Labour and Child Labour Risks**

During the previous fiscal year, Alliston at Home Inc. did not conduct a risk assessment for forced or child labour within our supply chain. However, in May of 2024, we hired an external consultant to carry out a risk assessment, aiming to identify potential vulnerabilities related to such issues in our supply chain. This analysis utilized data from the Walk Free Global Slavery Index and the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour, enabling us to pinpoint potential risks associated with specific products and regions. It is essential to note that the outcomes of this risk identification exercise do not indicate the actual existence of forced or child labour within our operations or supply chains. Instead, the assessment was designed as a preventive measure to anticipate possible situations where such risks might develop. We acknowledge that no industry is entirely free from the risks of forced or child labour, especially within parts of the supply chain located in regions with less stringent regulations and enforcement. Our risk evaluation included a geographical analysis using the Walk Free Global Slavery Index, highlighting areas with increased risks of forced and child labour. This geographical analysis was complemented by an examination of categories of goods considered to be at risk, enhancing the precision of the risk assessment. Our results show that the overall risk of forced or child labour within our supply chain remains low, as all our suppliers are located in Canada, a country recognized for its minimal risk in these areas. Despite this low risk, we are committed to ongoing vigilance and continuously improving our risk management practices and policies. The relatively low risk does not

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diminish our dedication to effectively managing and mitigating potential risks moving forward.

#### **Section D: Remediation Measures**

Up to and including the previous fiscal year, Alliston at Home Inc. has encountered no cases of forced or child labour within our operations or supply chain. Consequently, there has been no need for remediation actions. Should we identify any instances of modern slavery within our operations in the future, we are prepared to implement suitable and prompt remediation strategies.

#### **Section E: Remediation of Loss of Income**

During the last fiscal year, no issues of forced or child labour were detected in our operations or supply chains, eliminating the need for remediation thus far. Should instances of modern slavery surface in the future, we pledge to undertake necessary actions to mitigate any resulting loss of income for affected individuals.

#### **Section F: Training**

Alliston at Home Inc. has yet to conduct training specifically designed to identify and mitigate issues related to forced or child labour for our team. Recognizing the need for such training, we are currently considering the development of a training curriculum for our procurement and purchasing departments. This program may be mandatory for all team members involved in these areas, with the following objectives:

**Education:** The program will aim to inform our employees about the definitions and forced and child labour and offer context on Bill S211 and why it is important.

**Skill Building:** To provide staff with the necessary skills to spot risks in our supply chain. This may include instructions on assessing supplier compliance and detecting subtle indicators of unethical labour practices.

**Intervention Strategies:** We will outline protocols for responding to discovered issues. This will cover procedures for internal reporting, initiating corrective measures with suppliers, and cooperating with external organizations as required.

Through this initiative, Alliston at Home Inc. intends to bolster the proficiency of its procurement and purchasing personnel, ensuring they are able to identify, and address forced and child labour concerns. This effort reflects our broader commitment to ethical business conduct and corporate responsibility.

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### **Section G: Assessing Effectiveness**

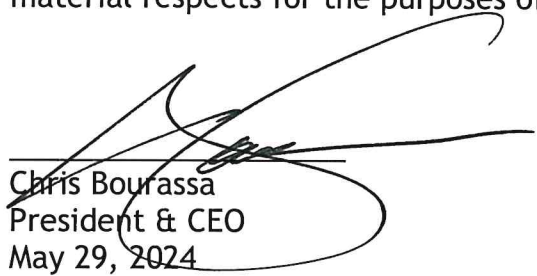
In the last financial year, due to the risk of modern slavery in our operations and supply chain being assessed as minimal, we did not conduct a formal evaluation of how effectively we prevent forced and child labour within our company. However, we will persist in reviewing our risk profile, and should the risk of modern slavery escalate, we will establish mechanisms to measure the success of our preventive efforts.

### **Conclusion**

Our commitment to upholding the highest standards of ethical behavior and compliance with Bill S-211 is unwavering. Although the risk of child labour and forced labour within our activities and supply chains is low, we remain dedicated to ongoing monitoring of these risks. We pledge to maintain transparency and adjust our risk mitigation strategies as needed, based on our evolving risk profile.

### **Attestation**

Following 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.



Chris Bourassa  
President & CEO  
May 29, 2024

I have the authority to bind Alliston at Home Inc.

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