



May 29, 2024

ATTN: Minister of Public Safety and Emergency Preparedness Canada

Subject: Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act")

Introduction

Modern Slavery Statement for the Financial Year ended December 31, 2023.

This statement is made pursuant to Bill S-211, an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act. This statement outlines the approach and initiatives by Auburn Holdings Inc. to identify and address the risks of forced labour and child labour in our business operations and supply chains during the financial year.

Structure, Activities and Supply Chains

Structure

This joint report covers Auburn Holdings Inc. ("Auburn") and each of the following entities, which are either owned directly or indirectly and also meet the reporting criteria set out in the Act either individually or as a controlled group of Auburn: Stonerise Construction Inc. ("Stonerise"), Silver Lake Developments Inc. ("Silver Lake"), Crico Holdings Limited ("Crico"), and Crich Holdings and Buildings Limited ("Crich"), in aggregate referred to as the "Auburn Group" for the purposes of this report.

Business Activities

The Auburn Group is a private family-owned business that has built a solid reputation as a developer, builder, and property manager for sixty years, based out of Southwestern Ontario.

Auburn has carried out business in Canada for two decades as it was incorporated March 12, 2004. While Auburn is the parent holding entity of Stonerise and Silverlake, it also holds and manages commercial real estate in downtown London, Ontario that is set to be converted to a high rise multi-residential condominium over-looking Victoria Park.

In the past 20 years, Stonerise Construction, Auburn's general contracting entity, has built high-rise multi-residential properties in London, Barrie, Kitchener, Waterloo, and Montréal. Currently, The Barrel Yards in Uptown Waterloo is our latest upscale development project, which includes the Delta Waterloo, six luxury high-rise apartments and a parking garage. Stonerise Construction focuses on residential high-rise, mid-rise, mixed-use and commercial buildings.

Both Silver Lake and Crich, Auburn's property holding and management entities, are family-operated businesses that have been developing and managing multi-residential apartment buildings across southwestern Ontario. Silver Lake and Crich are committed to providing quality apartment homes and creating lasting relationships with our residents and community partners. This commitment has helped



pave the way for developing more communities across Southwestern Ontario along with a dedication to building suites to fit the lifestyles of our customers. Crico, is the holding parent company of Crich.

Principles and Governance

The Auburn Group operates with high standards of governance, ethics, compliance, and risk management. Ownership along with senior management work closely with our employees, business partners, sub-contractors, and suppliers to ensure that those associated with the Auburn Group understand and comply with these high governing standards. At the Auburn Group, integrity is the cornerstone of our operations, ensuring responsibility and ethical practices guide every decision and action. We deeply value diversity and are committed to fostering an inclusive environment where every individual is respected. Innovation is at the heart of the Auburn Group, where we continuously seek to adapt and evolve, dedicated to developing projects that are environmentally responsible and beneficial for future generations. Our human resource department works closely with management to ensure all members of our teams understand the principles set forth by ownership and are provided with the tools and training required to perform at these high standards. New employees must review the Code of Ethics and Business Conduct and acknowledge adherence to it when they join the Auburn Group.

Supply Chains

The Auburn Group does procure raw materials within its general contracting and property management activities. While the Auburn Group works with hundreds of different suppliers and contractors, most of our procurement of goods, materials and services are with local and reputable Canadian agents whom the Auburn Group has worked with for many years. Given our high standards of governance and ethics, the Auburn Group strives to do business with organizations and/or individuals that operate with similar values. These agents share Auburn Group's respect of human rights as a fundamental corporate responsibility and a value that governs our conduct in all our business activities.

While dealing with primarily Canadian suppliers, the procurement of certain products and the manufacturing of certain products by those suppliers may occur outside of Canada. While this type of procurement is minimal, the Auburn Group has conducted a preliminary assessment of the risks of forced labour and child labour in our supply chain and has concluded the risk is minimal. The Auburn Group will review the Global Slavery Index and will continue to monitor and assess our risks on an ongoing basis via our internal processes.

Polices and Due Diligence in relation to Forced Labour and Child Labour

The Auburn Group is developing a Supplier Code of Conduct to formalize and reinforce our position on the essential principles concerning this Act, as well as to ensure a more fulsome understanding with our suppliers that such ethical practices must be followed.

Already implemented, the Auburn Group, with the assistance of its legal representatives, has updated its modified CCA 1 Stipulated Price Subcontract and all corporate purchase order agreements to directly address the concerns of this Act as it relates to forced labour and child labour. The following two clauses were added to our agreements:



Clause #1: The Subcontractor shall ensure that at all times each of its employees is paid wages in accordance with general industry standards for amounts payable as wages to persons performing the employee's role at the time and place of the Work, and in any event not less than the statutory minimum wage in force at the time and place of the Work.

Clause #2: The Subcontractor shall provide written confirmation to the Contractor with each application for payment that the Subcontract Work and the Subcontractor's Construction Equipment and Products do not include and are not derived from forced labour and/or child labour, as both of those terms are defined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9) or in any successor legislation of similar purpose, either in the provision of the Subcontract Work, and the Subcontractor's Construction Equipment and Products, or in the supply chains relating to the Subcontract Work, and the Subcontractor's Construction Equipment and Products.

Training Provided to employees on Forced Labour and Child Labour

The Auburn Group's leadership team have all conducted informal training regarding Bill S-211 and the particulars of the Act. Subsequent team meetings were conducted to ensure a consistent and accurate understanding was achieved across all appropriate employees company wide. It is the intention of the Auburn Group to formalize specific training addressing modern slavery and to have it imbedded in our onboarding training for all new appropriate employees.

Measures taken to Remediate any Forced Labour or Child Labour

Not applicable. As of the date of this report, no remediation measures have been taken by the Auburn Group as no instances of forced labour and child labour were identified in its operations or supply chain. The Auburn Group will continue to monitor and assess its operations and supply chain and is committed to implementing appropriate remedies depending on the circumstances should forced labour or child labour arise.

Measures taken to Remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of Forced Labour or Child Labour in its activities and supply chains

Not applicable. As of the date of this report, the Auburn Group is not aware of any instances where a loss of income for vulnerable families has occurred due to its efforts to identify and mitigate the risk of forced labour and child labour from its operations and supply chain.

Assesses the entities effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

Aligned with the Government of Canada's commitment to strengthening its reporting guidance on forced labour and child labour in Canadian supply chains, the Auburn Group will continue to monitor on an ongoing basis the requirements set forth in the Act and address and improve any issues identified in



our current processes. The Auburn Group will commit to on-going training specifically addressing the Act and ultimately do our part to mitigate or eliminate the use of forced labour and child labour. While the Auburn Group does not have a formal process in place for measuring the effectiveness of our mitigation and prevention of forced labour and child labour within our activities and supply chain, we will work towards implementing a more formal process that could provide a level of measurement.

Approval and Attestation

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31, 2023. For clarity, I have provided the attestation above in my capacity as a director and officer of the Auburn Group and not in my personal capacity.

A handwritten signature in black ink, appearing to be "JC" or similar initials, written in a cursive style.

Jamie Crich
President, Director

I have the authority to bind the Auburn Group

May 29, 2024