



## **Overview**

This report is prepared for BTR Holdings Inc., jointly with its wholly-owned subsidiaries, Sunspace Modular Holdings Inc., Sunspace Sunrooms, Windows and Doors Ltd., 8059853 Canada Inc., 2265598 Ontario Inc., and 1000159375 Ontario Inc. (collectively The Sunspace Group and hereafter referring to as Sunspace).

The purpose of this report is to clarify Sunspace's commitment to respecting human rights and affirm our compliance with the requirements of bill S-211 or the "Fighting Against Forced Labour and Child Labour in Supply Chains Act". The Report outlines steps taken during our previous financial year ended January 1, 2024 to prevent and reduce the risk that forced labour or child labour is used at any step of the procurement and production of our goods, in Canada or elsewhere, or of goods imported into Canada thereby.

Sunspace remains committed to respecting and championing the human rights of everyone who comes into contact with our business, including our employees, agency workers, workers within our supply chain, and local communities. We strive to take all reasonable steps to ensure that slavery and human trafficking are not present either in our business nor in our supply chains.

## **Organizational Structure**

Sunspace is a manufacturer of sunrooms, windows, doors, railings, and roofing systems, headquartered in Newcastle, Ontario and having production plants in Newcastle and Lindsay, Ontario and Neenah, Wisconsin. We have been producing products since 1991, from assembling to full scale manufacturing. We sell our products to a dealer base situated within North America (wholesale distribution) and our supply chains are predominately located in North America, with some direct supply out of China, England, France and Spain. In addition, our North American suppliers source manufactured parts from Asia and Europe.

The companies which comprise Sunspace are privately-held corporations incorporated under the laws of Ontario and which operate with an Executive Management Team, led by the CEO. There are senior executives responsible for each functional department.



## **Risk Assessment**

SunSpace is aware that there exists the potential for modern slavery in the operations and supply chains of most global companies. As we are incorporated within Canada, a country which has enacted local, provincial and federal laws to strongly oppose and penalize the existence of child labour and human trafficking, we have created our practices and internal culture to not only ensure compliance with these laws but also to reflect our core beliefs. As such, the risk of forced labour or child labour among our internal production and personnel is negligible. We have identified that our most prominent risk is in our supply chain and pertains to overseas suppliers in particular as these risks are recognized to be stronger in certain cultures and countries than others.

## **Action Plan**

We are in the process of fully implementing a thorough review process of all significant suppliers within our supply chain and will continue to develop this process over time. Specific actions include requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply.

At present, we have completed the review of our largest supplier (representing 40% of overall spend) and will continue to expand this review to the other suppliers within our supply chain.

Future onboarding of new suppliers will specifically include processes to ensure supplier compliance with our policies mentioned in this report.

In addition, we have undertaken to create and issue an illegal labour policy to formalize our existing commitment to ensuring that human rights are respected within our own operations within the organization. Specifically, this policy includes the following:

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships



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- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate
- Training to employees on forced labour and/or child labour

### **Remediation Measures**

At this time, we have identified no instances of forced labour or child labour in our activities and supply chains. As such, we have not identified a need for and therefore have not undertaken any remediation measures.

### **Approval and Attestation**

This report was approved by the President and CEO of Sunspace for the fiscal year ended January 1, 2024, in accordance with subparagraph 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I hereby attest that I have reviewed the information contained in the report for the entity listed above. To the best of my knowledge, and after having exercised due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Steven Hunt

President and CEO, Sunspace