

**Report under Canada's Fighting Against Forced Labour
and Child Labour in Supply Chains Act for the year
ended January 31, 2024**



BELKORP



1. Introduction

This Report has been prepared jointly by Belkorp Industries Inc. and its subsidiaries, (collectively the “Company” or “Belkorp” or “our” or “we”), for our financial year ended January 31, 2024 (the “Reporting Period”) in response to the requirements under Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act).

Belkorp recognizes the importance of preventing and assessing the risk of forced labour and child labour in Canada’s supply chain.

2. Structure, activities and supply chains

Structure

Headquartered in Vancouver, British Columbia, Canada, Belkorp is a private family-owned investment firm with three investment pillars: real estate, operating businesses, and capital markets. Belkorp is a multi-generational, family-owned business built on honest, loyal, and long-standing relationships. The Company operates in Canada and the U.S. We have a commitment to strong governance practices, including respecting human rights which is a core corporate responsibility.

Activities and supply chains

The Act requires Belkorp to report on activities in relation to the production, sale, distribution of goods, both in and outside of Canada, and the importation of goods into Canada. This information is set out below.

Our operating businesses include Belkorp Ag, LLC (“Belkorp Ag”) which owns and operates John Deere dealerships across California, AtSource Recycling Systems Corp. (“AtSource”) which is a supplier of waste and recycling solutions throughout Canada and northwestern U.S., and Big Sky Golf Inc. (“Big Sky”) which is a golf course located in British Columbia.

Belkorp procures a range of goods and services in Canada and the U.S. which includes the following:

- Belkorp Ag primarily engages in the procurement and distribution of John Deere products. Our operations chiefly entail the direct purchase of goods from John Deere for resale within the U.S. market. To a lesser extent, Belkorp Ag also purchases and sells non-John Deere parts and equipment predominantly procured from suppliers in the U.S.

- AtSource specializes in the rental and sale of balers and compactors for waste management and recycling purposes. Their equipment includes a variety of balers and compactors designed to handle different types of materials and volumes. The equipment is predominantly procured from suppliers in Canada and the U.S.
- Big Sky purchases golf gear, apparel and accessories which are sold in its golf shop. The products are predominantly procured from suppliers in Canada and the U.S.

3. Steps to prevent and reduce risks of forced labour and child labour

During the Reporting Period, Belcorp's approach to preventing and reducing the risk that forced labour or child labour is used in our operations and supply chains included conducting a preliminary internal assessment of our business activities and supply chains for our key operating businesses and commencing a review of our internal policies and procedures.

Further details on these activities are provided in the following sections of this report.

4. Policies and due diligence processes

Overview

Belcorp's due diligence processes involve embedding responsible business conduct into our governance structure, policies, and risk management systems.

Governance and policies

Belcorp is committed to strong corporate governance which is engrained in our values and culture. As well, the Company is accountable to an independent Board of Directors. Belcorp's governance, policies and procedures are the framework and foundation that support sound decision making.

Belcorp has established policies outlined in our Employee Handbook to enforce ethics and compliance with laws and regulations, which would include preventing and reducing the risks of forced labour and child labour.

Our policies serve as a guide to ensure that our employees understand our values and their responsibilities and obligations in our commitment to conduct business in a safe, respectful and ethical manner, including within our operations and supply chains. Our policies are outlined below.

Standards of Conduct policy

The Employee Handbook outlines the Standards of Conduct for employees, emphasizing the importance of ethical behavior and compliance with laws and regulations, which would include preventing and reducing the risks of forced labor and child labor.

Ethics & Reporting Hotline

To demonstrate management's commitment to the highest legal and ethical standards, the Company has established an Ethics and Reporting Hotline. This hotline provides a confidential and anonymous platform for employees to report any illegal or unethical activities they may encounter, which would include suspected instances of forced labor or child labor.

5. Forced labour and child labour risk

The Company's operations are located in low-risk jurisdictions, based on an initial internal assessment of our business activities and supply chains.

To date, our approach to identifying the risks of forced labour and child labour has focused on the sectors we operate in, as well as the location of our activities and operations, and on employees and our direct suppliers.

6. Remediation measures and remediation of loss of income

Belkorp has established remediation policies and processes to ensure that complaints or concerns relating to human rights, including the use of forced labour and/or child labour, are heard and adequately addressed. We have established an Ethics & Reporting Hotline to provide employees with a safe and anonymous means to report illegal or unethical activities. This hotline, operated by an independent, third-party professional organization, is available 24/7 and can be accessed via phone, email, or a dedicated website. Employees are encouraged to use this hotline to report any concerns. Reports made through the hotline are thoroughly investigated, and appropriate corrective action is taken to address any identified issues.

To date, Belkorp has not received any complaints relating to forced labour or child labour in our operations or supply chain, and as such has not taken any substantive remediation measures.



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7. Employee training

Although we have not designed or implemented training specifically related to forced labour or child labour, we ensure that all new hires receive an onboarding package that includes our Employee Handbook which sets out our Standards of Conduct and information on the Ethics & Reporting Hotline. All new employees are required to attest that they have received, read and will abide by our policies. Our policies are accessible to all employees through our internal company website. Any updates or changes to these policies are communicated promptly to all employees, ensuring that everyone remains informed and compliant with our ethical standards.

8. Assessing effectiveness

We do not currently have procedures in place to assess effectiveness in ensuring that forced labour and child labour are not being used in our activities and supply chains.

9. Approval and 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 Belcorp Industries Inc., Belcorp Newstech Holdings Inc. and Belcorp Real Property Inc. (the “Companies”). 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 Period.

I have the authority to bind the Companies.

Stuart Belkin, Chairman & CEO
May 15, 2024