



**BUILDDIRECT.COM TECHNOLOGIES INC.**

**2023 Report pursuant to the  
*Fighting Against Forced Labour and  
Child Labour in Supply Chains Act***

## 1. About this Report

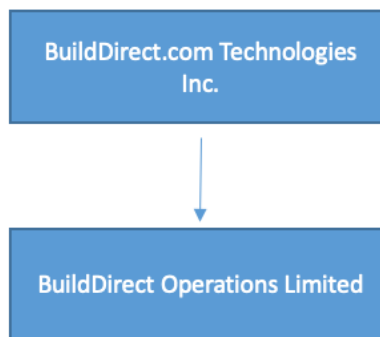
This is a joint report (the “**Report**”) by BuildDirect.com Technologies Inc. and its Canadian subsidiary BuildDirect Operations Limited pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). The Report is made for the financial year ending December 31, 2023. Except where otherwise noted, references to “BuildDirect”, the “Company” “we” or “our” in this Report refer to BuildDirect.com Technologies Inc. and BuildDirect Operations Limited.

## 2. Structure, Activities and Supply Chains

### A. Structure

BuildDirect.com Technologies Inc. is incorporated under British Columbia Business Corporations Act and its shares are listed on the Toronto Stock Exchange – Venture Exchange.

The following organizational chart sets out the Company’s Canadian organizational structure and material subsidiaries as of December 31, 2023:



BuildDirect Operations Limited is a wholly owned subsidiary of BuildDirect.com Technologies Inc.

### B. Activities

BuildDirect is a leading omnichannel building material retailer with its head office in Vancouver, British Columbia. BuildDirect connects North American home improvement B2B and B2C organizations and homeowners with quality building materials and services through its supply chain network. BuildDirect's growth trajectory, strong product offering, and proprietary heavyweight delivery network is solidifying its position as an innovative player in the home improvement industry.

### **C. Supply Chain**

BuildDirect has established strong longstanding relationships with dozens of domestic and international flooring suppliers located in Canada, the United States and Asia. Through these supplier engagements, BuildDirect imports finished flooring and ancillary flooring products for sale and distribution to its end customers through its e-commerce as well as brick and mortar Pro Center operations in Canada and the United States.

BuildDirect has invested in and developed its own proprietary North American delivery network which specializes in the storage and distribution of heavyweight goods. This network leverages warehousing and distribution locations within Canada and the United States and, along with reputable national shipping providers, allows BuildDirect to efficiently ship heavyweight orders to the homes and jobs sites of its customers.

BuildDirect, through itself and its operating subsidiaries, has employees and third-party warehouse services providers in British Columbia, Canada, as well as in the US states of California, Georgia and Michigan who assist with the operation and management of its supply chain functions and processes.

### **3. Steps Taken During the Reporting Year**

The steps BuildDirect has taken during the reporting year to prevent and reduce the risk that forced labour or child labour is used in its operations and supply chain are set out below. In summary, BuildDirect has implemented its policies and due diligence processes, conducted its annual supply chain risk assessment and continued the training it provides to its employees.

### **4. Policies, Governance and Due Diligence Processes**

#### **A. BuildDirect Employee Policies**

BuildDirect currently has employee policies in place to support honest and ethical conduct in BuildDirect's business operations specifically a Code of Ethics and Conduct Policy as well as a Whistleblower Policy. These policies apply to all directors, officers and employees of BuildDirect and such individuals are required to confirm their acceptance of such policies as part of their engagement with the Company. The foregoing policies in particular aim to promote and instill a culture of high ethical standards and commitment to compliance by such directors, officers and employees with all applicable laws, rules and regulations including, without limitation, applicable human rights, health and safety and environmental laws. These policies further provide mechanisms (including, without limitation, a confidential hotline) (a) by which employees can, confidentially, identify and report concerns or questions around actual or suspected violations of these policies involving the Company or third parties with which the Company has business relationships and (b) through which reported actual or suspected violations are reviewed and investigated and, if necessary,

corrective action is taken in relation thereto. These policies forbid retaliation for acts of good faith reporting of suspected or actual violations of such policies.

#### **B. Supplier Agreement and Guidelines:**

BuildDirect completes thorough due diligence on its supply chain business partners and engages partners who have an established reputation and history of operational performance and financial stability within the industry and their country of origin and who share BuildDirect's commitment to ethical operations and practices. All BuildDirect product suppliers are subject to BuildDirect's Supplier Agreement and corresponding Guidelines pursuant to which such suppliers are required to act in a fair, honest, and ethical manner and fully comply with all applicable laws, rules or regulations (including, without limitation, in relation to manufacturing, health and safety and environmental laws). Compliance with the BuildDirect Supplier Agreement and Guidelines is a condition of ongoing engagement as a product supplier to BuildDirect. In recent years, BuildDirect has taken steps to hone the number of suppliers and third-party services providers within its supply chain to both continue to optimize its business operations servicing its customers as well as to continue to strength the security, safety and efficiency of its supply chain activities.

#### **C. Third Party Certification**

BuildDirect is a certified participant in the US Customs and Border Protection C-TPAT (ie Customs-Trade Partnership Against Terrorism) program. This program involves annual internal and external audit of BuildDirect's supply chain network and corresponding evaluation of its policies and procedures and the effectiveness of the same in maintaining safe and secure supply chain operations that comply with applicable laws.

As a condition of annual re-certification, this process also mandates that the Company complete an annual assessment of risks within its supply chain, confirm steps the Company is taking to continue to mitigate any such risks and complete regular review of suppliers and third-party services within its supply chain including through physical site visits and corresponding audits by the Company of international supplier operations and warehouse operations of third party services providers in North America. This process has also historically involved, in the ordinary course, site visits by US CBP representatives to BuildDirect warehousing and supplier locations within and outside North America to verify the Company's ongoing compliance with C-TPAT standards.

### **5. Risk Assessment and Remediation Measures**

Annually, BuildDirect completes processes to map its supply chain and safety and security risks associated therewith including, without limitation, risks associated with active product suppliers within the jurisdiction from which the Company sources product and supply chain services. BuildDirect further completes annual onsite audits of suppliers and third-party supply chain services providers to supporting its mapping exercises and validate ongoing

compliance with its Supplier Agreement and Guidelines. BuildDirect is in the process of honing this mapping process further to improve the same as it relates to its assessment of forced labour and child labour risks.

Based on its due diligence processes to date, (a) BuildDirect is not aware of any specific instances of forced labour or child labour with any of its product suppliers or third party services providers and (b) the Company is not aware of any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in their activities or supply chains, and therefore the issue of remediation is not considered applicable.

While BuildDirect has not identified any instances of forced labour or child labour in its operations or supply chain through its assessment processes to date, it acknowledges that there may be general risk of forced labour and child labour relative to the industry within which the Company operates, the products associated with such operations and some of the jurisdictions which the Company's supply chain may interact with.

BuildDirect will therefore continue to evaluate risk of the same within its supply chain over time and consider potential opportunities to improve its processes to manage modern slavery risk in its operations.

## **6. Training:**

All new BuildDirect employees are required to complete mandatory onboarding training which includes their confirmation and acceptance of BuildDirect's policies and procedures. BuildDirect tracks certification of employee acceptance of its policies, including its Code of Conduct using digital tools.

Members of BuildDirect's supply chain and logistics operations teams also complete annual supply chain training courses which focus on, among other topics, supply chain safety and security (including, without limitation, workplace safety considerations).

## **7. Assessing Effectiveness:**

Based on BuildDirect's due diligence processes to date, BuildDirect believes modern slavery risk within its current operations and supply chain are low. The Company will, however continue to complete its periodic audit of its supply chain operations and corresponding risk assessment of the same, generate its annual supply chain risk assessment for review by members of the Company's management and report any material risks in relation thereto to its Board. BuildDirect will further continue to encourage applicable stakeholders to disclose, confidentially and in good faith, any incidents of suspected or actual violations of the Company's policies, agreements or applicable law for review and investigation by the Company.

**8. Approval and Attestation:**

This report is approved and attested pursuant to subsections 11(4)(b)(ii) and 11(5) of the *Act*.

*(s) Milan Roy*

Milan Roy, Director

May 29<sup>th</sup>, 2024

I have authority to bind BuildDirect.com Technologies Inc.