

Burrow, Inc.

**Modern Slavery Act Report**

(Fiscal Year 2023)

## 1. Introduction

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced or child labour within their operations and supply chain. This is a report for Burrow, Inc. which has an obligation to publish a report under the Act (“Burrow” or the “Company”). This report refers to the 2023 fiscal year end, being December 30, 2023 for Burrow and describes steps taken by the Company in 2023.

At Burrow, our purpose is to “make it radically easier to settle in.” We are dedicated to promoting social equity, a fundamental focus for our business, both in the USA, Canada and beyond. We acknowledge our obligation to respect and protect the human rights of everyone associated with our business, including colleagues and employees in our stores and facilities, as well as workers in our supply chain network, such as migrant and temporary labourers. Our customers expect that the products we offer are sourced from suppliers who ensure safe, fair, and ethical working conditions.

Burrow is dedicated to preventing and mitigating the risks of forced and child labour throughout our stores and facilities, as well as across our business partners and global supply chain. We require our business partners and suppliers—including their contractors, agents, subcontractors, sub-agents, and labour agencies—to uphold these principles within their operations and comply with relevant human rights and employment standards laws.

## 2. Steps taken to prevent and reduce the risk of forced labour or child labour

In 2023, Burrow has taken the following steps to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods imported into Canada. More details on these actions are set out in the Report.

### **Governance and Auditing**

1. Burrow’s Vendor Code of Conduct (the “Code”) is signed by every supplier and specifically references prohibition of involuntary labour practices. The Code, which is based on universally accepted, fundamental principles and local laws, represents Burrow’s commitment to source goods from suppliers who value and incorporate these provisions into their operations. The Code also dictates that the supplier shall always comply with the highest requirement, whether the applicable law or Burrow requirement, and have systems in place to ensure they are continually updated with applicable laws and regulations.
2. The Code prioritizes Labour Practices with explicit requirements regarding: Child Labour, Voluntary Labour, Discrimination, Wages, Benefits, Terms of Employment, Working hours, Freedom of Association, Health & Safety, Environmental Protection, Ethical Conduct, Sub-Contracting, Management Systems, Transparency, Responsibility and Compliance.
3. Burrow has contracted staff on the ground in Vietnam, where the majority of products are produced. They visit the factories regularly and ensure the Code is upheld. The sourcing team visits other factories generally at least once a year.
4. Many of the factories that Burrow works with are audited by external agencies.

### 3. Burrow Structure, Activities and Supply Chains

#### **Structure**

Burrow Inc. is an American corporation. The registered office is 15 West 27th Street, 10th Floor, New York, NY, 10001.

#### **Activities**

Burrow's purpose – "making it radically easier to settle in" – is focused on simplifying the home furnishing process by selling its modular furniture collections at Burrow.com. Product is shipped from US and Canadian warehouses directly to customers doors. Burrow employs 67 full and part-time employees and operates 4 retail stores in the USA.

#### **Supply Chain**

Burrow sources its branded products from Vietnam, China, Mexico, India, and Poland.. Burrow's product development team works closely with third party vendors to develop and manufacture the products.

The sourced goods include furniture, rugs, and pillows.

### 4. Company policies and due diligence processes in relation to forced labour and child labour

Through codes of conduct for suppliers and comprehensive compliance standards, Burrow strives to uphold the rights of customers, colleagues and employees, as well as the many workers across Burrow's supply chain. Burrow is dedicated to upholding human rights, founded on our core commitment to integrity. We vow to provide a secure and inclusive environment for all our employees and workers throughout our supply chain, as well as the numerous customers who select our products.

Burrow's supplier relationships are guided by the Vendor Code of Conduct. It applies to both domestic and foreign producers and manufacturers that supply goods and services. Suppliers must share the Supplier Code with their contractors, agents, sub-contractors and sub-agents, including any labour agencies who are engaged to assist with providing goods or performing services Burrow.

By entering into standard terms and conditions or other contractual agreements with Burrow, Suppliers accept the terms of the Vendor Code and affirm compliance with its requirements. Burrow's Vendor Code sets minimum expectations and guidelines for Suppliers and obligates them to comply with applicable laws, including those regulations related to forced and child labour. It focuses on worker rights and protections, with a particular emphasis on prohibiting child, forced and trafficked labour, as well as any discrimination, intimidation, abuse, harassment or violence against these workers. Furthermore, Burrow's Vendor Code requires compliance with laws respecting workers' freedom of association and right to collectively bargain their terms and conditions of employment. Burrow keeps records of all contractual counterparties, and our supplier contracts contain risk mitigation and enforcement provisions, including unhindered access, with or without notice to audit their facilities and records, as well as termination rights based on violation of the Code.

### 5. Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

Burrow is confident that there is no risk of forced or child labour risk in the operations and supply chain of the organization. This assurance comes from the thorough due diligence conducted when engaging new suppliers, the strictness of our binding agreements, the close relationships we maintain, and the regular visits of our staff to the factories.

## 6. Remediation of any forced labour or child labour

To date there have been no identified or reported instances of any forced labour or child labour in our activities and supply chain. Should we receive any reports through compliance audits or other reporting mechanisms, our management and escalation processes are designed to ensure a timely and effective response.

## 7. Remediation of 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

To date there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

## 8. Training provided to employees on forced labour and child labour

Procurement and sourcing leadership ensure that all staff are well-versed in the Vendor Code of Conduct, enabling them to effectively enforce it.

## 9. Effectiveness assessments to ensure that forced labour and child labour are not being used in our business and supply chains

To reduce and prevent the risk of forced and child labour within our operations and supply chains, we regularly assess the effectiveness of our actions to continuously improve our approach to ensuring protection of human rights.

We require all new suppliers to sign our Vendor Code, which extends to sub-contractors and disclosure to Burrow that sub-contractors are used. The Burrow team is engaged and committed to the company's internal commitment to human rights. We review all audit reports to assess any human rights risks.

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 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.

Kabeer Chopra  
Chief Technical Officer, Burrow, Inc.  
May 31, 2024

Signature

*Kabeer Chopra*

I have the authority to bind Burrow, Inc.