

## **Centura Tile - Modern Slavery Report**

### **Fighting Against Forced Labour and Child Labour in Supply Chains Act. (Bill S-211)**

**This statement is for the period from January 1, 2023 – December 31, 2023**

Centura Tile is committed to upholding human rights and promoting ethical practices across all aspects of our operations. As part of this commitment, we adamantly oppose any form of slavery, forced labor, child labor, or human trafficking within our supply chains or any other business activities. Centura Tile has a zero-tolerance approach to these practices and is dedicated to complying with all relevant laws and regulations, including those set forth under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act. (Bill S-211)*.

#### **Steps to prevent and reduce risks of Forced labour and Child labour:**

Centura Tile has adopted a Modern Slavery Policy, in addition to our Human Rights Policy which is included in the Centura Tile Code of Conduct. All employees are required to read and sign off on these policies prior to commencing employment. These policies set out Centura's guiding principals on professional conduct and establishes that in performing their duties, Centura employees should always act lawfully, ethically, and in the best interest of the company. Centura has also adopted a Whistleblower Policy, which provides direction and protection for employees to report any concerns or suspicions regarding unethical, illegal, or fraudulent behavior within the organization. In addition, Centura Tile has conducted a preliminary internal assessment of the risks of forced labour/child labour in our supply chains. The details of these actions are set out in this report.

#### **Corporate Structure, Activities, and Supply Chains:**

Centura Limited is a Corporation (dba Centura Tile) and the parent company of Centura (Toronto) Limited, Centura (Quebec) Limited, Centura (Hamilton) Limited, Centura (Ottawa) Limited, Centura (Vancouver) Limited, and Centura (Western) Limited.

This report was filed on a joint basis for all corporations listed above. The parent corporation and subsidiaries listed share similar business practices, suppliers, and customers. Each are exposed to the same risks related to *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. Policies have been adopted across all corporations listed.

Centura Tile operates in Flooring Distribution industry and engages in the distribution of flooring and flooring related products primarily in Canada. Centura's supply chain includes importing flooring and related products manufactured across the globe. Centura is not subject to Modern Slavery reporting requirement in other jurisdictions.

Any identified concerns reported to management, will be brought forward to the CFO for presentation to the CEO and Board.

**Policies and Due Diligence Processes:**

Centura maintains policies to combat the use of forced labor and child labor in our operations and supply chains. These include our Modern Slavery Policy, Human Rights Policy, and Whistleblower Policy. These are outlined in our Company's Code of Conduct and required to be read and signed off by all employees, prior to commencing employment.

Centura's due diligence processes related to our supply chain include a thorough assessment of suppliers, and business partners to identify and mitigate risks of forced labor and child labor. These processes include a risk assessment (see below), manufacturing facility visits, discussions with senior management, agents, and industry experts.

**Risk Assessment and Management:**

Certain parts of our business and supply chains may carry a higher risk of forced labor or child labor. Centura has conducted an initial assessment of the risks, both external and internal of slavery and child labour. This assessment includes: country risks, sector risks, and partnership risks.

We analyse our risk by engaging in research and mapping our supply chain against human rights indices.

**Remediation Measures:**

In the event that forced labor or child labor is identified within our operations or supply chains, we will take immediate remedial action.

Remediation measures may include termination of contracts with non-compliant suppliers, and collaboration with relevant stakeholders to address root causes.

**Employee Training:**

All employees are required to review the Modern Slavery Policy and the Whistleblower Policy that are included in the Centura Tile Handbook.

Employees that are involved in the purchasing process, which would include: Executive Management, Branch Managers, Senior Sales Representatives, and Purchasing Staff are required to attend mandatory training.

Training covers topics such as identifying signs of exploitation, reporting mechanisms, and the importance of ethical sourcing.

In 2024, Centura intends to provide training to targeted audiences on the topics listed above.

**Assessment of Effectiveness:**

We assess the effectiveness of our efforts to prevent forced labor and child labor through regular monitoring and evaluation. We continuously review and refine our policies and practices to enhance effectiveness and address emerging risks.

By implementing these measures and continuously improving our practices, Centura Tile is committed to ensuring that forced labor and child labor are not used in our business and supply chains.

Centura Tile reserves the right to amend, update, or terminate this policy at any time as deemed necessary.

Date: May 31, 2024

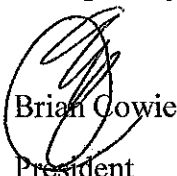


Brian Cowie, President

Centura Tile

**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 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.”



Brian Cowie

President

I have the authority to bind Centura Limited