

Modern Day Slavery Report Comtrad Strategic Sourcing Inc. (“Comtrad”)

Requirement (a) – Structure, activities and supply chains

Structure

- Comtrad is a Canadian Controlled Private Corporation
- Organizational structure:
 - 100% owned by Ardenton Capital Corporation
- Organizational Mandate: Provide quality sourcing of goods and services enhancing the North American supply chain.
- At December 31, 2023 Comtrad had 20 employees all based in Canada and 2 employees based in the USA.

Activities

- Comtrad provides global sourcing and customized products for its end markets
- Comtrad manages the supply chain, engineering and logistics for its end markets that are predominantly based in North America
- Comtrad, while it sources for multiple industry verticals, the majority of its activities are focused on hardware supply for the woodworking industry

Supply Chain

- Comtrad sources most products and solutions through Asian manufacturers and distributors most of whom are publicly listed.

Requirement (b) – Policies and due diligence processes

Due diligence

- At Comtrad, our strong company culture is underpinned by our commitment to ethical, transparent, and authentic interactions with our customers, partners, and other stakeholders.
- This commitment to ethical behaviour, transparency and authentic interactions is supported by our Code of Conduct.
- Comtrad’s vendors and channel partners have confirmed their commitment to eliminating Modern Slavery in published modern slavery act transparency statements and/or codes of conduct.

Requirement (c) – Forced labour and child labour risks

- Based on due diligence performed and the vendor and channel partners the company chooses to source products and solutions from, management believes that the risk of forced labour and child labour in the supply chains in which we operated is extremely low.

Requirement (d) – Remediation measures

- Comtrad has assessed that its activities and supply chains carry a low risk of forced labour or child labour being used. The question of remediation is considered not applicable.

Requirement (e) – Remediation of loss of income

- Comtrad has assessed that its activities and supply chains carry a low risk of forced labour or child labour being used. The question of remediation of loss of income is considered not applicable.

Requirement (f) – Training

- Comtrad has assessed that its activities and supply chains carry a low risk of forced labour or child labour being used. The question of training is considered not applicable.

Requirement (g) – Assessing effectiveness

- Comtrad has assessed that its activities and supply chains carry a low risk of forced labour or child labour being used. The question of assessing effectiveness of measures taken is considered not applicable.

Approval of Report

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 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.

Karim Kanji

Signature

5.31.2024

Date

I have the authority to bind Comtrad Strategic Sourcing Inc.
Karim Kanji
Interim President and CEO