



COOPER

Report regarding *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff*

A. Introduction

Cooper Construction Limited is committed to preventing the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Company.

Cooper Construction Limited (“Cooper Construction” or the “Company”) files this report in accordance with *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”), which is aimed at increasing industry awareness and transparency and promoting businesses to improve practices to identify, and address forced labour and child labour risks.

The Company’s fiscal year that is relevant for this Report is March 1, 2023, to February 29, 2024 (“Reporting Year”).

B. Corporate Structure, Activities and Supply Chain Operations

Cooper Construction conducts business as a general contractor throughout Southern Ontario in three primary sectors: design/build construction, construction management, and commercial and industrial real estate development.

The President leads the day-to-day operations of the company.

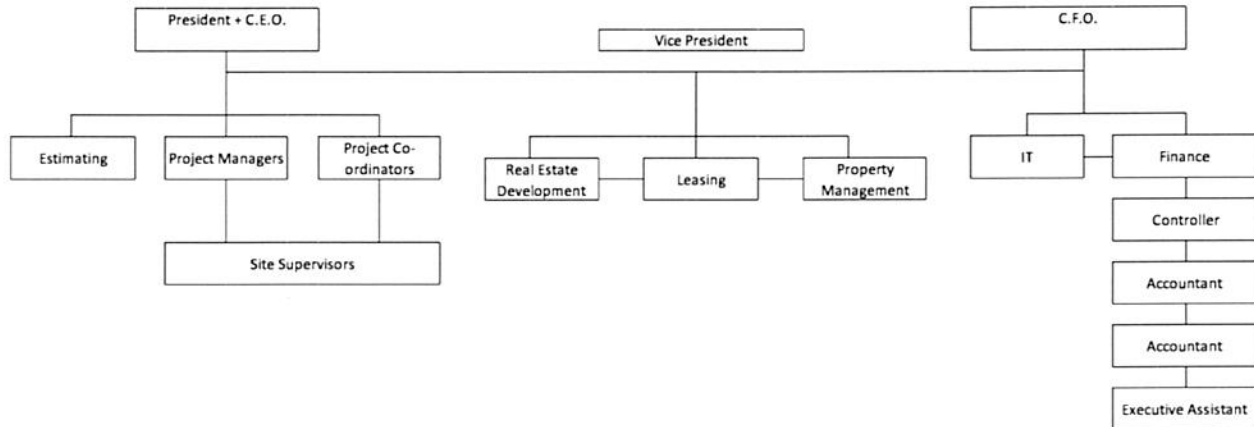
The Company supply chain consists primarily of design/fabricate/install services provided by sub-contractors.

Cooper Construction has been incorporated in the Province of Ontario.



Functional Organization Chart:

Cooper Construction Functional Organizational Chart
May 2024



Safety and accident prevention are core elements of Cooper’s operational philosophy and practice. This ceaseless focus has been recognized over the years with numerous awards and certificates for best practices from industry associations and public institutions. Safety compliance inspections are carried out regularly for every Cooper project. Today, Cooper Construction is considered a leader in promoting construction site safety.

Cooper Construction takes initiatives to engage with the community, such as local job creation, business partnerships, and support for local business growth, enhancing local residents' overall quality of life. Throughout its long history, one of Cooper Construction’s most cherished principles has been its ethical responsibility towards the communities in which it operates. Support and sponsorship in areas such as health care, education and advanced learning, community arts, technology and recreation facilities is Cooper’s way of contributing to the quality of life in the communities where we have lived and built for over 100 years.

Cooper Construction currently has 28 employees.

Cooper Construction's sister companies are Cooper Acquisition Corporation and Cooper Development Corporation.

Cooper Construction is a member of both the Ontario General Contractors Association and the Canadian Construction Association.

Cooper Construction is party to Collective Agreements with the International Union of Operating Engineers, the Labourers International Union of North America, and the United Brotherhood of Carpenters, and Joiners of America.



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Cooper Construction's activities include the construction of industrial buildings, and commercial office buildings primarily in Southern Ontario.

Typical imported goods required for the Company's construction activities include steel, aluminum, glazing, roofing materials, electrical and mechanical equipment. A rough estimate of the cost of materials imported by sub-contractors for the year ended February 29, 2024, is \$20,000,000.

The United States is the primary source of manufactured goods utilized in the Company's construction activities.

C. Prevention and Reduction of Risk of Forced Labour or Child Labour

- 1. Steps to Prevent and Reduce the Risk that Forced Labour or Child Labour is used at any step of the production of goods in Canada or elsewhere by Cooper Construction or of goods imported into Canada by Cooper Construction**

In the Reporting Year, Cooper Construction has yet not engaged in steps to reduce and/or prevent the risk that forced labour and/or child labour is used in any step of the production of goods in Canada or elsewhere by Cooper Construction or in respect of goods imported into Canada by Cooper Construction.

- 2. Cooper Construction's Policies and Due Diligence Processes in relation to Forced Labour and Child Labour**

Cooper Construction does not have specific policies related to the use of forced labour or child labour. However, Cooper Construction does require that all employees of the Company must be a minimum of 19 years of age.

- 3. Business and Supply Chains Operations that Carry a Risk of Forced Labour or Child Labour and the Steps Cooper Construction has taken to Assess and Manage that Risk**

Cooper Construction began the process of identifying risks of forced labour or child labour being used in its business operations and/or its supply chain operations. At this time, Cooper Construction has not identified any forced labour or child labour in its business activities and supply chains.

- 4. Cooper Construction's Measures Taken to Remediate Forced Labour or Child Labour**

Cooper Construction has not taken any measures to remediate forced labour or child labour. At this time, Cooper Construction has not identified any forced labour or child



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labour in its business activities and/or its supply chains. Therefore, Cooper Construction has not implemented any measures to remediate the loss of income to the most vulnerable families that could result from any measure taken to eliminate the use of forced labour or child labour.

5. The Training Provided by Cooper Construction to Employees on Forced Labour and Child Labour

Cooper Construction has not yet provided training to employees on child labour and forced labour issues.

6. How Cooper Construction Assesses its Effectiveness in Ensuring that Forced Labour and Child Labour are Not Used in its Business and Supply Chain Operations

Cooper Construction has not implemented measures to assess its effectiveness in ensuring that forced labour and/or child labour are not used in its business and/or its supply chain operations.

D. Attestation

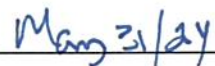
In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



John Goldspink

Director

I have the authority to bind Cooper Construction Limited.



May 31, 2024