

DECO HOMES

Forced and Child Labour Report 2023

Corporate Structure, Activities and Supply Chain

DECO Homes is a privately owned company with operations exclusively in southern Ontario. Our primary business is the construction of new single family detached, semi detached and townhouse homes. We have recently expanded into building condominiums and purchasing/developing land for our own future sites and to provide service ready lots to other builders. We use professional service companies for all our work as well as Trades who supply and install products in the construction process. We hire unionized employees on our construction sites and also use unionized trades where required. The materials we use to build our homes is sourced mainly from various domestic suppliers with minimal coming internationally from our suppliers.

Governance and Responsibilities

Given our process and our dependency on external companies to provide unionized labour and supply the materials for the construction of our homes, we are determining how we can implement a process to ensure that our extended Supply Chain complies with Bill S-211.

We operate in a very low risk industry with the majority of our materials (foundation, brick, lumber) manufactured locally within Ontario and Canada. Our initial investigation has determined the following:

Domestic labour/trades

As we use unionized labour, we are currently relying on the integrity of our local suppliers and trades to be in compliance with the labour laws of Ontario and ultimately Bill S-211.

Products

DECO Homes does not manufacture any of the material, nor do we keep any inventory of product that goes into the construction of our homes. We negotiate a supply and install agreement with our trades/suppliers to provide goods and/or services in the construction of our new residential units. We are in the process of evaluating how we can monitor and ensure that we are in compliance with Bill S-211. Our building process places a great deal of responsibility in the hands of our suppliers and trades to ensure they are in compliance with the legislation as well.

Policies and Standards

In 2023, we reviewed our internal processes and policies to determine whether we had any exposure in meeting the requirements for Bill S-211. We have identified and are planning to include clauses in our standard tendering documents and in our contract agreements going forward which will include an acknowledgement from our Trades/Suppliers that to the best of their knowledge there is no child or forced labour used in the production, installation or manufacture of their products and services. If we have any reason to believe a current Supplier or Trade may be using forced or child labour in their supply chain pipeline we will terminate our relationship and look to replace them with another Supplier or Trade that is in compliance.

Understanding our Risk Exposure

Our risk exposure once again is dependant on our domestic suppliers for providing goods that are sourced from their respective suppliers that they are in compliance with the international laws as they relate to child and or forced labour. The risk is compounded in that we operate in a world economy where goods that become part of our finished products are sourced from various world sources. We place a heavy dependence on international laws and organizations to ensure we are informed which countries are in compliance with the laws regarding forced labour and or child labour.

Training

We are reviewing our staff training both in the office and on our construction sites as to processes and evaluation method required to ensure we are in compliance with Bill S-211. We believe at this early stage, this will be an ongoing process requiring regular review and training to ensure ongoing compliance.

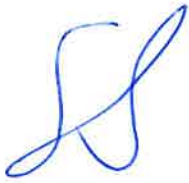
Effectiveness of Enforcement

As we are in the evaluation process of our risk assessment, it is still early to make an assessment of the process. We will be looking at including our policy with regards to Forced and Child Labour compliance on a go forward basis in any new contracts and renewals. In addition, we are in the process of hiring a Director of Human Resources and one of their mandates will be to ensure we stay ahead of the curve in complying with Bill S-211.

Report Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that that I have reviewed the information contained in the Report for DECO Homes and its affiliated companies. 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 aspects for the purpose of the Act, for the reporting year as listed above.

I have the authority to bind DECO Homes and its affiliated companies.



Corey Brown,

President