

**Doug Tarry Limited**

**Bill S-211, Supply Chain Act Reporting**

**May 31, 2024**

**1. \*This report is for which of the following?**

- Entity

**2. \*Legal name of reporting entity or government institution**

- Doug. Tarry Limited

**3. \*Financial reporting year**

- July 1, 2022 to June 30, 2023

**4. \*Is this a revised version of a report already submitted this reporting year?**

- No

**5. For entities only: Business number(s) (if applicable):**

- 897272654

**6. For entities only: \*Is this a joint report?**

- No

**7. For entities only: \*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?**

- No

**8. For entities only: \*Which of the following categorizations applies to the entity? Select all that apply.**

- Canadian business presence:
  - Has a place of business in Canada
  - Does business in Canada
  - Has assets in Canada
- Meets size-related thresholds:
  - Has at least \$20 million in assets for at least one of its two most recent financial years
  - Has generated at least \$40 million in revenue for at least one of its two most recent financial years

**9. For entities only: \*Which of the following sectors or industries does the entity operate in? Select all that apply.**

- Construction
- Real estate and rental and leasing

**10. For entities only: \*In which country is the entity headquartered or principally located?**

- Canada

**10.1 If in Canada: \*In which province or territory is the entity headquartered or principally located?**

- Ontario

# Annual Report

## Reporting for entities

**1. \*What steps has the entity taken in the previous financial year 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 the entity or of goods imported into Canada by the entity?**

- Other, please specify (see #2 below)

**2. Please provide additional information describing the steps taken (if applicable).**

- Doug. Tarry Limited prides itself on highly ethical standards and practices. We have various policies promoting ethical practices including an employee code of conduct and respect and dignity in the workplace policy. All employees undergo orientation and training with respect to ethical practices and are required to sign off on relevant policies.
- We work with trade partners and suppliers with strong reputations and develop long term relationships with them.
- We prioritize the use of local suppliers and trade partners wherever possible and the vast majority are at least North American suppliers.
- We research potential suppliers and ensure they comply with regulatory bodies such as ISO. All applicable suppliers are required to provide up to date general liability insurance, workers compensation insurance, and Form 1000 (Registration of Constructors and Employers Engaged in Construction.)
- We have a vendor code of conduct that we require all trade partners to abide by.
- We have site supervisors who ensure trade partners are operating according to applicable laws, regulations, and codes of conduct.
- Within our own hiring process, HR is knowledgeable and ensures we abide by all applicable labour laws.

**3. \*Which of the following accurately describes the entity's structure?**

- Corporation

**4. \*Which of the following accurately describes the entity's activities?**

- Producing goods (including manufacturing, extracting, growing and processing)
  - in Canada
- Selling goods
  - in Canada
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

**5. Please provide additional information on the entity's structure, activities and supply chains.**

- Doug. Tarry Limited is a land developer and home builder in St. Thomas Ontario. We also manage rental properties, and have subsidiary companies in related industries such as HVAC, pre-fabricated wood frame panel construction, and paint distribution.
- Our supply chain mainly consists of subtrades that work on home construction. Major supplies include lumber used in panel construction and HVAC equipment such as furnaces. We use local trade partners and suppliers wherever possible and the vast majority of suppliers are based in North America.
- Trade partners supply most of the labour and supplies used on our sites, while internal labour is used for site supervision, panel construction and HVAC installation and service.

**6. \*Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?**

- No

**6.1 \*If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour?**

**7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable)**

**8. \*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

- Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

**8.1 \*If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.**

- The use of outsourced, contracted or subcontracted labour

**9. \*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

- Construction

**10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable).**

- Due to our localized operations, the risk of forced labour or child labour being used is assessed to be low.
- We mitigate the risk by using local, reputable suppliers and promoting ethical behavior amongst employees and trade partners through codes of conduct and corporate culture/values.

**11. \*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

**11.1 \*If yes, which remediation measures has the entity taken? Select all that apply.**

**12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable).**

**13. \*Has the entity taken any measures to remediate the 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?**

- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

**14. Please provide additional information on any measures the entity has taken to remediate the 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 (if applicable).**

**15. \*Does the entity currently provide training to employees on forced labour and/or child labour?**

- No

**15.1 \*If yes, is the training mandatory?**

**16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).**

**17. \*Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

- No

**17.1 \*If yes, what method does the entity use to assess its effectiveness? Select all that apply.**

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable).**

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.

Doug Tarry Jr., President

May 27<sup>th</sup>, 2024



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"I have the authority to bind

Doug. Tarry Limited