



GRIMCO CANADA FISCAL YEAR 2023 MODERN SLAVERY REPORT

January 1st, 2023, to December 31st, 2023

1.0 Introduction

This report is prepared by Grimco Canada (“**Grimco Canada**” or “**we**” or “**us**”) for the fiscal year ended December 31st, 2023 (“**Fiscal 2023**”) as required by the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This report summarizes the steps taken to prevent and reduce the risk that modern slavery is used at any step of the production of goods that are produced, sold, or distributed by us.

2.0 Steps to Prevent and Reduce the Risk of Forced Labour and Child Labour

Grimco Canada took the following steps during Fiscal 2023 to prevent and reduce the risk of forced labour or child labour in our operations and supply chain:

- Conducted an internal assessment to identify areas of our operations that have a risk of forced labour and child labour;
- Mapped activities and our supply chain;
- Developed and deployed a formal statement on modern slavery in our supply chain;
- Developed and implemented a compliance checklist for employees with responsibility for procurement; and
- Created awareness and training materials to enhance employees’ understanding of the Act and their related responsibilities.

3.0 Structure, Activities, and Supply Chains

Grimco® is a national wholesale sign supply manufacturer and distributor with over 50 locations across North America. We focus on distributing quality products and providing excellent service to the sign industry. Our offering of sign supplies includes traffic signs, blanks, substrates, boards, digital print media, wrap films, sign vinyl, application tape, banner material and supplies, sign frames, banner stands, LEDs and electrical accessories, grand format solvent/UV/latex printers, inks, software and more.

Grimco has locations across Canada, North America, and multiple distribution centers. Along with the above-mentioned offering, we are also an authorized equipment reseller for HP and Epson. Our branded digital print media product lines include 3M™, Avery Dennison®, ORAFOL®, Clear Focus, Sihl, RTape, General Formulations, Neschen and Seal. We also offer exclusive product lines including Key and Forward Banner by Briteline®, Briteline®, HanleyLED, 20/20 Color®, Rad Grafix, Ion PVC® and MAX-metal®. We also offer technical support for your equipment.

Grimco® will strive to better service our customers nationwide through further geographic growth. You can order online 24/7 with our easy and convenient webstore.



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We will also continue to represent the highest quality and most technologically advanced products available, always at a great value.

We believe in selling within the industry to sign makers, and we'll never compete with our customers. We will continue to employ the industry's most knowledgeable and skilled employees with experience to help you grow your business.

Grimco Canada is headquartered in Richmond Hill, Ontario and has 145 employees, as of December 31st, 2023, all of whom are in Canada. Grimco Canada also maintains a presence in Toronto, Ontario, Dartmouth, Nova Scotia, Montreal, Quebec, Winnipeg, Manitoba, Calgary, Alberta, Edmonton, Alberta, and Vancouver, British Columbia. Grimco Canada's supply chain consists of suppliers of finished goods based either in Canada or the United States, China, and the United Kingdom.

3.1 Our Mission, and Values

Mission

To be a high-performance leader in the sign industry that:

- Attracts customers and exceeds expectations.
- Provides an enriching, fulfilling, and rewarding work environment for employees.
- Values long-term relationships with vendors and customers alike.
- Achieves solid financial performance.

Values

- We recognize that our employees are our number one asset.
- Individual ideas/creative additions from our employees that will improve performance and efficiency.
- We operate at all levels with an open-door policy.
- We expect each employee to go the extra mile for Grimco and for his/her team.
- Healthy competition.
- Our customers.

3.2 Our Activities and Supply Chains

Category	Description of Goods
Converting	Bond paper
Electrical	Illuminated Sign making supplies
Graphics	Wide format printing media
Inks	Print supply
Plastics	Illuminated Sign making supplies
Substrates	Sign making supplies
Equipment	Printers, plotters, routers, etc.

For further information regarding the above mentioned, please visit www.grimco.ca



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4.0 Policies and Due Diligence Processes

4.1 Code of Conduct

Grimco Canada's Code of Conduct (the "**Code**") has been adopted as the minimum standard of ethics for all internal stakeholders of Grimco Canada (i.e., employees at every level). Complying with the Code is part of the terms and conditions of the employment relationship with Grimco Canada. The Code is intended to help guide all internal stakeholders to continue to effectively recognize and address ethical issues, enhance existing mechanisms of reporting unethical conduct, and help to continue to foster and sustain a culture of honesty and accountability. All Grimco Canada internal stakeholders are bound by the Code and must comply with its requirements.

4.2 Considerations for Modern Slavery in Procurement

Grimco Canada is currently developing an Expenditure Authority and Control Policy, which will govern procurement, to reduce the risks of modern slavery in our supply chain. In tandem, a checklist that guides staff on the key considerations to be made with respect to modern slavery during procurement, will be developed. We plan to deploy these items in 2024.

4.3 Third Party Risk Management Policy and Framework

Grimco Canada is currently developing a Third-Party Risk Management Policy (the "**TPRM Policy**") which will form the basis for a standardized, risk-based approach to all phases of the vendor lifecycle, incorporating best practices in the selection, management, and evaluation of third parties engaged by Grimco Canada to manage the risk. We plan to deploy these items in 2024.

4.4 Contractual Clauses

Grimco Canada will develop contractual clauses that seek to reduce the risk of modern slavery. Going forward, we intend that all contracts to be negotiated with suppliers of goods shall include such clauses. We plan to deploy the contractual clauses in 2024.

4.5 Supplier Code

Grimco Canada is currently developing a Supplier Code of Conduct ("**Supplier Code**"). The Supplier Code will set out rules for our suppliers that require them to take certain steps to reduce the modern slavery risks in their supply chains. We plan to deploy the Supplier Code in 2024.

4.6 Reporting Mechanisms

Reporting can be done by email, at hrca@grimco.com, or by contacting the Human Resources department directly at 416 635 4141.

5.0 Risk Assessment



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Grimco Canada's operations are located entirely within Canada and are largely focused on distribution. We are not engaged in the type of work normally associated with forced labour or child labour.

Nonetheless, we recognize that the potential exists for forced labour or child labour to be present in our supply chain, either with direct suppliers or indirect suppliers further down the supply chain.

While we must continue to be vigilant, our current assessment is that we have minimal exposure to modern slavery risks in our supply chain.

6.0 Remedial Measures

Grimco Canada is unaware of any instances of forced labour or child labour in our supply chain, and therefore we did not take any measures to remediate any adverse impacts or the loss of income to families that could have resulted from measures taken to address modern slavery. If we learn of any potential or confirmed instances of modern slavery, we will investigate and take appropriate remedial measures.

7.0 Training

Grimco Canada employees receive regular training on regulatory requirements, ethical practices, and our policies. All new employees are assigned a mandatory onboarding package which includes a review and acknowledgement of our Code of Conduct. Additionally, employees are required to review, sign off and abide by our Code of Conduct annually.

In Fiscal 2024, Grimco Canada will hold mandatory training for staff who are directly responsible for procurement matters. Internal awareness building will also be conducted for all employees on the Act, why Grimco Canada is subject to it, our reporting requirements and employee responsibilities.

Grimco Canada will include awareness building on modern slavery in all employee onboarding packages along with an annual refresh course for employees directly responsible for procurement matters.

8.0 Assessing Effectiveness and Future Improvements

An assessment of the new measures in Sections 4.2, 4.4 and 4.5 of this report will be conducted at the end of the next fiscal year to determine their effectiveness. This assessment will determine what future improvements are needed to enhance our commitment to preventing and reducing the risk of modern slavery in our supply chain.



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9.0 Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(a) of the Act by the Vice President of Grimco Canada for the fiscal year ended December 31st, 2023.

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 this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind Grimco Canada.

Full Name: Marc Belzil

Title: Vice President, Canada

Date: May 27th, 2024