

## Joint Modern Slavery Report of IDL Ventures Inc. and IDL Projects Inc.

This is a Joint Report of IDL Ventures Inc. and IDL Projects Inc. under the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (the “Act”).

Financial Reporting year: 2023

Business Numbers:

IDL Ventures Inc.: 834501611

IDL Projects Inc.: 832387948

### **(a) Structure, Activities and Supply chains**

#### *Corporate Structure and Activities*

IDL Projects Inc. (“**IDL Projects**”) is wholly owned and controlled by IDL Ventures Inc. (IDL Projects and IDL Ventures Inc. are collectively referred to as “**IDL**”). IDL Ventures Inc. is a holding company which owns and controls companies that operate primarily within the construction industry. Of the companies that are owned and controlled by IDL Ventures Inc., only IDL Projects is an “entity” as defined under section 2 of the *Act*.

IDL Projects is a civil and infrastructure construction company headquartered in Prince George, British Columbia, with construction projects that expand throughout Western Canada and internationally, including British Columbia, Alberta, Saskatchewan, as well as the Cayman Islands. IDL Projects employs approximately 50 employees. It does not produce, sell, or distribute goods in Canada or internationally. Its primary business is that of a general contractor on a wide range of civil and infrastructure projects. In this role, IDL Projects, on rare occasions, will import goods produced outside of Canada.

#### *Supply Chains and Actions Taken to Prevent and Reduce Risk of Forced Labour or Child Labour*

To the greatest extent possible, IDL Projects minimizes those situations where it must import goods into Canada. Most goods procured by IDL for its projects are purchased through Canadian distributors or manufacturers. By limiting the importation of goods produced outside Canada, IDL Projects reduces the risk that the goods it incorporates into its projects are produced with forced and/or child labour.

There are rare occasions in IDL’s business, however, where it is required to import goods that have been produced outside Canada. In 2023, for example, there were only 6 occasions where IDL Projects had to import goods for the purposes of its construction projects. Of those 6 occasions, 4 times the goods were imported from the United States and the other 2 times the goods were imported from China.

When the need to import goods from outside of Canada does arise, it is generally on projects where highly specialized parts or equipment are required and/or where there are difficulties procuring the required goods in Canada due to issues with Canadian distribution chains. When IDL does have to import goods from outside Canada, efforts are made to use suppliers with an internally verified reputation for ethical business practices and compliance with regulatory requirements.

**(b) Policies and due diligence processes in relations to forced labour and child labour**

With the *Act* now in force, this is the first time that IDL has had modern slavery compliance obligations. Historically, our supply chain due diligence processes have not focused on identifying specific risks related to child labour and/or forced labour. As a result, IDL has not fully developed and implemented policy and process framework to address modern slavery considerations.

Internal discussions started in 2023 about potential updates to policies and due diligence process to address modern slavery considerations more specifically. IDL is starting to assess modern slavery risks in its supply chains and tasking its employees, especially those responsible for procuring goods from foreign jurisdictions, with engaging more actively with potential suppliers and asking questions related to modern slavery risks. IDL is currently working on developing key communication points that will be used in the purchasing process with potential suppliers.

In the meantime, IDL does have some due diligence processes in place that we expect will help minimize forced labour and child labour risks, including as follows:

- (i) IDL employees responsible for procuring goods from foreign jurisdictions engage in a vetting process of potential suppliers, which includes researching supplier reputations within the industry and asking key questions of suppliers about their business practices and compliance with regulatory requirements.
- (ii) IDL also ensures that its contracts, especially any with foreign suppliers of goods, contain provisions which ensure compliance with applicable laws, including forced and/or child labour laws.

**(c) Parts of its business and supply chains that carry a risk of forced labour or child labour being used and steps taken to assess and manage the risk**

IDL recognizes that the risk of child labour and/or forced labour existing in our supply chains are higher when goods come from certain geographical areas. However, IDL has not currently identified any specific risks in its business and supply chains that are associated with child labour or forced Labour.

**(d) Measures taken to:**

- a. **remediate any forced labour or child labour; and**
- b. **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**

To date, IDL has not identified any forced labour or child labour in its activities and supply chains. As a result of not having identified any forced labour or child labour at this time, IDL has also not taken any measures at this time to remediate loss of income to vulnerable families

**(e) Training provided to employees on forced labour and/or child labour**

Due at least in part to the fact that IDL has not previously had modern slavery compliance obligations, IDL has not provided specific training to its employees on forced labour and child labour. IDL is, however, currently developing an action plan to create educational materials which will increase employee awareness around the issues of forced and/or child labour, as well as the *Act* and its goals and purposes.

**(f) Assessing effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains?**

IDL regularly reviews and updates its internal policies and procedures to address new and emerging risks to all aspects of its business. As new information is gathered around modern slavery risks in its supply chains, new policies and procedures will be developed to address any current and emerging risks.

**Report Approval and Attestation**

In accordance with the *Act*, and in particular ss. 11(4) and 11(5), I attest that:

- (i) this Joint Report of IDL Ventures Inc. and IDL Projects Inc. has been reviewed and approved by the Directors for both IDL Ventures Inc. and IDL Projects Inc.; and
- (ii) I have reviewed the information contained in this joint report for IDL Ventures Inc. and IDL Projects Inc. 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.

Full Name: Todd Wayne Patterson

Title: President and Director

Date: May 30, 2024

Signature:  \_\_\_\_\_

I have the authority to bind IDL Ventures Inc. and IDL Projects Inc.