
Menkes Developments Ltd.

ANNUAL REPORT

Purpose

This annual report for the 2023 financial reporting year has been created by Menkes Developments Ltd. for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Act”). This is a joint report on behalf of Menkes Developments Ltd., Menkes Corporation, and Menkes OTP1 LP Inc. (collectively “Menkes”).

Organizational Structure, Activities, and Supply Chains

Menkes is a multi-disciplinary real estate development group that specializes in the development of single-family homes and condominiums, as well as the development and management of a portfolio of office, industrial and retail buildings. Menkes is principally located in Toronto, Ontario, Canada.

Menkes imports goods such as concrete, steel, electrical and mechanical equipment, quartz slabs, vinyl flooring and promotional materials. The majority of materials are procured through subcontractors or suppliers hired by Menkes. These subcontractors and suppliers have their own supply chains, including overseas supply chains.

Menkes only sells goods inside Canada. Menkes primarily sells residential units/homes and manages a portfolio of commercial, industrial and retail buildings.

Policies and Due Diligence Processes

Menkes maintains general due diligence processes that promote responsible, ethical and legal procurement practices, including with respect to labour practices within the supply chain.

Standard agreements between Menkes and contractors are governed by a statement of work clause wherein contractors are required to agree that they will provide and supply all necessary labour, material, plant, and equipment in accordance with all labour laws and any other law, rule or regulation of any government authority having jurisdiction.

In addition, the internal code of conduct (“CC”) outlines the expected behaviour of employees of Menkes and requires that all employees conduct themselves in accordance with the law and the appropriate ethical standards. The CC requires that all employees obey both the letter of the law and the spirit of the law that apply to their profession, employment, and industry.

Menkes maintains employee policies that prescribe duties, responsibilities, and expectations of employment. This includes workplace policies and procedures to operate in compliance with provincial employment standards, human rights, and occupational health and safety legislation.

Steps Taken in Prior Financial Year

Menkes Developments Ltd.

The above due diligence processes and policies were in place in the prior financial years. However, Menkes did not take any other additional steps with respect to forced labour and child labour in the 2023 financial year.

Forced Labour and Child Labour Risks

Moving forward, Menkes will be working to identify specific risks of forced labour and child labour that may exist in its supply chain. It is aware that there may be higher risks associated with materials from certain regions and industries.

Menkes is considering modifications with respect to forced labour and child labour in the contractual terms of their standard purchasing agreements and contracts. Menkes will be considering modifications to existing procurement documents to require vendor attestation to compliance with the Act.

Remediation Measures

In the 2023 financial reporting year, Menkes did not identify any forced labour or child labour in its activities or supply chains. As such, Menkes has not undertaken any remediation measures.

Remediation of Loss of Income

Menkes has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any income remediation measures.

Training Provided to Employees

Menkes provides employee training as part of its onboarding process. This includes training with respect to safe, ethical, and legally-compliant workplace practices and policies. Menkes is in the process of assessing what forced labour and child labour-related training may be appropriate, with a particular focus on its procurement team.

Effectiveness Assessment

Menkes does not currently have specific policies and procedures in place to assesses its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, it will be assessing what measures may be appropriate in the future.


Approval and Attestation

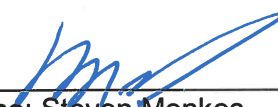
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true,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

IN WITNESS WHEREOF the authorized signing officer(s) of Menkes Developments Ltd., Menkes Corporation, and Menkes OTP1 LP Inc. have executed this report as of the effective date of the signature set out below.

Menkes Developments Ltd.

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May 31, 2024) **Per:** 
Date) **Name:** Steven Menkes
) **Title:** Secretary
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) I have authority to bind Menkes Developments Ltd.

SIGNED)
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May 31, 2024) **Per:** 
Date) **Name:** Steven Menkes
) **Title:** Secretary
)
) I have authority to bind Menkes Corporation.

SIGNED)
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May 31, 2024) **Per:** 
Date) **Name:** Steven Menkes
) **Title:** Secretary
)
) I have authority to bind Menkes OTP1 LP Inc.