

## **Modern Slavery Report for Old Oak Properties Inc.**

### **Introduction**

Old Oak Properties Inc. (Old Oak) is committed to maintaining the highest standards of ethical conduct in its operations and supply chains. This report outlines the steps taken during the fiscal year ending December 31, 2023, to prevent and reduce the risk of forced labour and child labour in our operations and supply chains, in compliance with Canada's Act on fighting against forced labour and child labour (Bill S-211).

### **Activities and Supply Chains**

Old Oak's operations consist primarily of developing and managing apartment buildings in London, Ontario. Our supply chains involve the procurement of building materials and services for the development and maintenance of our properties. We work with a variety of suppliers and third-party contractors, mostly local to the London area.

### **Policies**

In response to Bill S-211, we have implemented policies to address modern slavery risks. These include:

- **Human Rights Policy:** We respect and support international human rights within our sphere of influence, and we do not tolerate any abuse of human rights within our operations or supply chains.
- **Procurement Policy:** Our procurement practices require that suppliers uphold the highest standards of ethical conduct, including the prohibition of forced labor and child labor.
- **Forced Labor and Child Labor Policy:** We prohibit the use of forced labor and child labor in our operations and supply chains.

### **Due Diligence Processes**

Our due diligence processes regarding forced and child labor in our business and supply chains include:

- **Risk Assessment:** We conduct risk assessments to identify areas in our business and supply chains where there is a risk of child labor and forced labor.
- **Risk Mitigation:** We have implemented controls to prevent and mitigate the identified risks. This includes reviews of our operations and supply chains, and corrective action plans for any identified issues.

## **Training and Capacity Building**

We provide training to specific employees on our modern slavery policies and due diligence processes. This ensures that they understand their responsibilities and are equipped to identify and respond to potential risks.

## **Reporting and Remediation**

We have established procedures for reporting any suspected instances of modern slavery. We take all reports seriously and will take appropriate remedial actions, including reporting to relevant authorities.

## **Conclusion**

Old Oak is committed to combating modern slavery in all its forms. We will continue to review and enhance our policies and processes to ensure compliance with Bill S-211 and to uphold our commitment to ethical conduct and corporate responsibility. We encourage all our stakeholders to join us in this important endeavor.

## **Attestation**

This report has been reviewed and approved by our board. 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

**Per:**



I have the authority to bind Old Oak Properties Inc.

Jeff Martin

President

May 7, 2024