

Orgill Statement Against Modern Slavery

Orgill, Inc. (Orgill) (we, our) is committed to respecting human rights and stands against all forms of modern slavery (a term that includes forced labour and child labour). This Report is issued in accordance with Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) for the financial year starting January 1, 2023 and ending December 31, 2023. This is a joint report of Orgill, Inc. and Orgill Canada Hardlines ULC, which is subject to the reporting requirements under the Act.

This Report describes elements of our human rights program for our 2023 fiscal year, which continues to evolve and incorporate global best practices like those embodied by the United Nations Guiding Principles on Business and Human Rights (UNGPs).

1. Our Structure, Business, and Supply Chains

Orgill is the world's largest independently owned hardlines distributor. It was founded in 1847, and is headquartered in Memphis, Tennessee. Orgill operates distribution warehouses across the United States of America, including one in Post Falls, Idaho. Orgill, Inc. also controls Orgill Canada Hardlines ULC, which operates a distribution warehouse in London, Ontario. Orgill's Post Falls, Idaho and London, Ontario distribution warehouses provide goods to retail hardware stores throughout Canada.

90% of goods are sourced domestically in the USA or Canada with the remaining goods being imported from Asia (China, Taiwan, Philippines, & Vietnam).

2. Modern Slavery Risks in our Operations and Supply Chains

Orgill has identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

Orgill is aware that within manufacturing, certain geographies, types of goods, or classes of suppliers are associated with forced labour and child labour risk. We use a 3rd party company for compliance monitoring and factory audits and avoid areas known to have enlisted forced and child labour.

The following aspects of our operations and supply chains are modern slavery risks:

- The sector or industry it operates in
- The types of products it produces, sells, distributes or imports
- The locations of its activities, operations or factories
- The types of products it sources
- Tier one (direct) suppliers
- Tier two suppliers

Orgill has not identified any forced labour or child labour in our activities and supply chains.

3. Actions Taken to Assess and Address Modern Slavery Risks

(a) Risk Assessment and Management

Orgill has partnered with BSI Connect (British Standards Institute) since 2015 to help provide a risk & security based global overview of Orgill's supply chain vendors and activities. This enhanced visibility empowers Orgill to ensure a resilient supply chain through data-driven insight. BSI's Connect features include:

- Largest proprietary global supply chain risk intelligence database that looks at more than 20 risk ratings including forced & child labor in over 200 countries
- Robust, interactive risk mapping capability
- Daily articles and analysis covering events and what they mean for supply chains
- Country risk profiles containing the current supply chain trends
- Personalize specific points of interest and alerts on potential supply chain impacts
- Supplier audit management and risk mapping with infused intelligence
- Notifications when suppliers complete and submit audits or corrective and preventative actions (CAPAs)
- Supplier audits and self-assessments using pre-built or custom templates
- Seamless communication with global suppliers through automatic translations
- Dashboards to track supplier compliance
- Access to BSI Intelligence and Supply Chain Analysts

BSI on behalf of Orgill conducts annual vendor and plant/manufacturing level security & safety audits on all partners that provide imports into the USA & Canada. Included in the audit are specific questions and requests for documentation regarding the use of prohibited forms of labour.

(b) Our Standards, Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Orgill has implemented the following due diligence processes in relation to forced labour and child labour:

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts

(c) Measures Taken to Remediate Forced Labour, Child Labour or Loss of Income in Relation to Forced Labour or Child Labour

Not applicable. Orgill 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 our activities and supply chains.

(d) Training provided to employees on forced labour and child labour

Orgill does not currently provide training to employees on forced labour and child labour specifically.

4. Assessing the Effectiveness of our Actions

To assess its effectiveness Orgill regularly reviews its policies and procedures relating to modern slavery. Orgill has implemented the following assessment methods to track the effectiveness of our policies:

- Partnering with an external organization to conduct an independent review or audit of the organization's actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

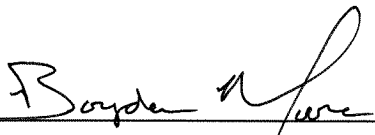
Further, Orgill regularly reviews information provided by BSI Connect to reduce the risk of forced labour in our supply chain and related activities.

5. Conclusion

We are committed to preventing and eradicating all forms of modern slavery in Orgill's procedures and supply chains. We will continue to regularly review our processes, practices and policies in order to ensure this goal is being met.

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 entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest in accordance with subparagraph 11(4)(b)(ii) of the Act 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. I have the authority to bind Orgill, Inc. and Orgill Canada Hardlines ULC.



NAME: Boyden Moore
TITLE: President & CEO
Dated: 05/31/2024