

partners
Development Group

Modern Slavery Report

Introduction

This Modern Slavery Report is issued in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c.9*. It outlines the steps that Partners Development Group Ltd. has taken and will continue to take to identify, assess and address the risks of modern slavery and human trafficking within its operations and supply chain. Administered by its Operations & HR Department, this report outlines PDG's approach and continual evaluation of its systems and controls to safeguard against modern slavery. If you have any questions regarding this report, please contact info@partnershomes.ca.

Identifying Information

This report is submitted on behalf of Partners Development Group Ltd. (PDG), business number 89524 7625, incorporated and principally located in Alberta, Canada.

- This report is for the financial reporting year commencing on October 1, 2022, and ending on September 30, 2023.
- This is not a revised version of a report already submitted this reporting year.
- This is not a joint report.
- PDG is not subject to reporting requirements under supply chain legislation in another jurisdiction.
- PDG is not listed on a stock exchange in Canada. PDG has a place of business in Canada, does business in Canada and has assets in Canada.
- PDG met two of the three categories for the reporting criteria.
 - has at least \$20 million in assets for at least one of its two most recent fiscal years.
 - has generated at least \$40 million in revenue for at least one of its two most recent fiscal years.
- In 2023, PDG operated in one or more of the following sectors or industries: construction, real estate, rental, and leasing.

Activities and Supply Chain

Headquartered in Okotoks, Alberta, PDG provides thoughtfully planned communities encompassing single-family and multi-family homebuilding, land acquisition and development, and property management.

PDG oversees the construction and development of homes by managing contracted trades and suppliers, and strives to ensure that forced labour and child labour are not taking place in its operations and supply chains. We do not knowingly engage in forced labour or child labour, or partner with any supplier who does. In the 2023 reporting period, the majority of goods and services procured were sourced from Alberta-based businesses who are a limited group of recognized and reputable local Calgary and area suppliers.

In 2024, PDG will implement a Contractor Vendor Agreement as a more comprehensive mechanism to govern its vendor management and supply chain, including compliance with the Act.

Policies and Due Dilligence

PDG is committed to conducting business according to the highest ethical business practices and conduct standards and has adopted a zero-tolerance approach to any form of modern slavery. PDG's Business Code of Conduct policy emphasizes its commitment to act ethically and with integrity and transparency in all business dealings.

PDG began assessing its supply chain in 2024 and have since taken the following steps to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or of goods imported into Canada:

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains.
- Developing and implementing due dilligence policies and practices for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.

In 2024, in addition to the Business Code of Conduct that governs all operations and behaviour and the prequalification process with all suppliers as part of the Contractor Vendor Agreement, PDG implemented a Recruitment Policy. This policy ensures that all hiring practices are ethical and transparent. It mandates that all employees are recruited voluntarily and have freedom to leave their employment after reasonable notice.

Areas of Risk and Remediation

For the 2023 reporting period, PDG did not have a formal supplier risk management process in place. However, it has since begun the process of identifying areas of risk in its operations and the supply chain. Many of the inputs into the PDG's supply chain in 2023 came from Canada, where the risks of forced and child labour are low. However, PDG is potentially exposed to these risks when goods are sourced (directly or indirectly) from countries with a higher risk of modern slavery. Although PDG refuses to partner with any supplier that engages in modern slavery knowingly, these risks remain, especially for indirect (e.g., tier two, tier three and beyond) suppliers.

With no formal mechanisms in place to determine if instances of forced or child labour were present in its activities and supply chains, PDG did not take any measures of remediation for forced labour, child labour, or for the most vulnerable families that remediation would impact.

Awareness Training

All PDG employees must adhere to the Business Code of Conduct policy. The policy is designed to ensure that personnel are aware of the standards of ethical business practice and expectations regarding moral conduct, including the obligation to act with fairness and to provide a safe and respectful work environment where all individuals are treated with dignity and respect. Review and compliance of the policy is required upon employment.

In 2024, PDG commenced work to incorporate training on modern slavery, including forced labour and child labour practices and risks into its corporate training programs for all PDG employees.

Assessment Process

In the 2023 reporting period, PDG did not have an assessment process in place in relation to forced labour and child labour. In 2024, PDG will begin a regular review or audit of its governance policies and procedures.

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.

I have the authority to bind PDG.



Greg Gutek
CEO, President
May 31, 2024