

ROBINSON™



FIGHTING AGAINST MODERN SLAVERY IN CANADIAN SUPPLY CHAINS

FEB.1 , 2023 - JAN. 31, 2024



INTRODUCTION

This Forced Labour and Child Labour Report ("Report") is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada).

This Report is a joint report which applies to Ross Group Inc. (RGI), the corporate parent company of B.A. Robinson Co Ltd. (ROBINSON) and describes the steps taken to mitigate forced labour and child labour in our organization's operations and supply chains. In this Report, ROBINSON and RGI are referred to collectively as the "Robinson Group."

This report is for ROBINSON's fiscal year ending January 31, 2024.

RESPECT FOR HUMAN RIGHTS

The Robinson Group fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour in our operations and our supply chain. Respect for human rights is fundamental to our values, the long-term stability and growth of our business and to the wellbeing of the communities in which we operate. We are committed to our strong corporate values and to continuous improvements in our policies and processes.

As set out in the United Nations Guiding Principles on Business and Human Rights

("UNGPs"), business enterprises have a responsibility to respect internationally recognized human rights. The responsibility to respect human rights requires that business enterprises: (a) avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; and (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, and the products or services obtained through their business relationships, even if they have not contributed to those impacts.

CORPORATE STRUCTURE, ACTIVITIES & SUPPLY CHAINS

CORPORATE STRUCTURE

ROBINSON and RGI are corporations incorporated under The Corporations Act in Manitoba. ROBINSON is a wholly owned subsidiary of RGI.

ACTIVITIES

ROBINSON is a leading distributor of plumbing, HVAC, hydronics, electrical and lighting products across a network of branches with operations in 5 provinces. ROBINSON was established in 1936, and is headquartered in Winnipeg, Manitoba. We attribute a portion of our longevity and success to our commitment to partnering with reputable brands who stand behind their products.

ROBINSON is family owned and operated with longstanding principles and values including commitment to our family of employees, exceptional customer service, and encouraging entrepreneurial spirit at all levels of the organization. These principles have contributed to ROBINSON's Platinum status as one of Canada's Best Managed Companies for the past 20 years.

Wholesale branches operate under the brand name ROBINSON Supply and showroom branches operate under the brand name ROBINSON. As of January 2024, ROBINSON employs more than 550 people in Canada. ROBINSON's business is facilitated across a network of 31 wholesale and showroom branches located across British Columbia, Alberta, Saskatchewan, Manitoba and Ontario.

ROBINSON has established organization guidelines and operating practices which govern operations including the hours of operation, employee job descriptions and salary ranges, and safety policies and procedures for employee protection. Permanent and full-time employees of ROBINSON are eligible

for employer-paid benefits, an employer-matched RRSP plan, and ROBINSON provides an Employee Assistance Plan (EAP) that supports the mental, social, physical, and financial health of ROBINSON employees.

SUPPLY CHAIN & OPERATIONS

ROBINSON is not involved in the direct manufacturing or sourcing of raw materials rather, ROBINSON purchases products for resale from over 750 manufacturers located primarily in Canada and the US. With ROBINSON's long history in business, we have developed established, long-term relationships with our trusted vendor and supplier partners.

GOODS & SERVICES PROCURED DIRECTLY BY ROBINSON TO SUPPORT OUR OPERATIONS

ROBINSON procures various services and goods (other than goods for resale) to support its operations. ROBINSON's specific supply chain profile remains largely the same year-on-year. The types of goods (other than goods for resale) and services procured by ROBINSON from its suppliers consist of:

- Office equipment and supplies/ consumables/marketing materials
- Technology and IT
- Transport and accommodation
- Facilities management
- Operational equipment, including forklifts

ROBINSON also procures professional (legal and accounting), investment and insurance services to support its operations.

Our suppliers to support ROBINSON's operations are primarily domiciled in North America, and we are of the view that our supply chains and activities for the types of goods and services procured by ROBINSON carry a low risk of the use of child labour and forced labour.





POLICIES, TRAINING & DUE DILIGENCE PROCESS

ROBINSON expects all vendors to share corporate values that include mutual respect for people and our communities. We expect our business partners to adhere to high standards of conduct and to comply with all laws and regulations.

We have implemented the following policies and processes to mitigate the risk of forced labour and child labour in our supply chain.

EMPLOYEE CODE OF CONDUCT

ROBINSON is committed to conducting our business ethically, legally and with integrity. The company's Code of Conduct builds upon our values and principles and is an overview of our expectations in areas that can raise ethical or legal concerns. We count on every employee to uphold and follow our Code of Conduct.

VENDOR CODE OF CONDUCT

ROBINSON's Vendor Code of Conduct defines our expectations in our supply chain by reinforcing our business standards of socially, ethically and environmentally responsible behaviours.

The Vendor Code of Conduct addresses various topics including forced and child labour, working hours and compensation, health and safety, and environmental sustainability.

Vendors are requested to return written acknowledgment via the Vendor Code of Conduct Acknowledgement form and will be reviewed every three years. In addition, ROBINSON's purchase orders have been modified to include a statement requiring Vendors to adhere to our Vendor Code of Conduct.

ORGANIZATIONAL STRUCTURE

During 2023, ROBINSON modified our corporate organization structure and created a new role, VP Supply Chain, to enhance the Company's focus on supply chain management and operational efficiency. As part of our ongoing commitment to elevate our customer experience and operations, this new executive role will champion and execute supply chain opportunities including stewarding and sharing our standards and values throughout our end-to-end supply chain.

TRAINING

ROBINSON has a comprehensive training and onboarding process. We are working on updating and expanding the training and awareness programs to cover issues related to forced labour, child labour and explain our obligations under the Act.

ROBINSON is committed to reviewing its policies and procedures on an ongoing basis.



RISK ASSESSMENT & MANAGEMENT

As a distribution operation, we do not manufacture products. The main risk of forced labour and child labour in our supply chain relates to products that we purchase for resale, particularly products and raw materials that are sourced from outside Canada and the United States. To mitigate this risk, we have outlined our expectations in our Vendor Code of Conduct. We expect our suppliers to provide written acknowledgment of the Code. As well, we meet annually with our major vendors and discuss business issues, including matters related to our supply chain.

REMIEDIATION MEASURES

Under the terms of our Vendor Code of Conduct, ROBINSON can conduct inspections to ensure compliance. If a vendor is in non-compliance of the Code of Conduct, the vendor may be considered in breach of contract and ROBINSON will take necessary action. ROBINSON is not aware of any forced labour or child labour practices occurring within its supply chain or in its activities at this time. Accordingly, ROBINSON has not had to take any measures to remediate forced labour or child labour to date.

ASSESSING EFFECTIVENESS

ROBINSON is committed to ongoing efforts to identify and prevent the use of forced labor and child labour in our supply chains. We will continue to assess the effectiveness of our efforts by:

- Reviewing our policies and procedures relating to our supply chain, including labour matters on an ongoing basis;
- Assessing compliance with our Vendor Code of Conduct and Acknowledgement Forms;
- Updating training and awareness programs for our employees and monitoring attendance;
- Discussing our compliance and industry best practice with the Company Executive and Advisory Board.



APPROVAL & ATTESTATION

This Report has been approved by the Board of Directors of B.A. Robinson Co. Ltd. in accordance with Section 11(4)(b)(ii) of the Act. 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 or entities 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.

K. Shea Robinson
President & CEO; Director
August 30, 2024
I have authority to bind B.A. Robinson Co. Ltd.



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