

## **Shelterlogic Group, Inc.**

**(including subsidiary ShelterLogic Operations Canada, LTD)**

### **Report on forced and child labour in supply chains and modern slavery**

**FY2023**

This report was prepared by Shelterlogic Group, Inc. (the “Company”) and its subsidiaries in response to reporting requirements under the combating forced labour and Child Labour in Supply Chains Act for our fiscal year ending December 31, 2023.

Slavery and human trafficking is a large and important issue for the Shelterlogic Group, Inc. We recognize the risks of forced and child labour in the manufacturing sector established in Asian countries (specifically China) and we are committed to continuously improving our due diligence, risk assessment, rehabilitation and training processes.

The Shelterlogic Group, Inc. views respect for human rights as a fundamental corporate responsibility and has zero tolerance for forced and child labour within the organization and its supply chain.

The Shelterlogic Group, Inc. is committed to continuing to monitor measures to prevent and reduce the risk of forced or child labour, including any other form of modern slavery, in its operations and supply chain operations.

#### **1. ABOUT THIS REPORT**

This report covers the fiscal year ending December 31, 2023. It is published by Shelterlogic Group, Inc. under the Combating Forced and Child Labour in Supply Chains Act (the “Canada Act”).

The scope and information provided in this report apply to the Shelterlogic Group, Inc. and its subsidiaries.

This report highlights the key actions taken by the Company over the past fiscal year to prevent and reduce the risk of forced or child labour in its operational and supply chain activities.

As stated in this report, our processes are validated annually by external firms specialized in compliance with social standards (Social Audit) and our company ensures to comply with these follow recommendations for improvement and/or correct a hazardous situation (audit reports available on demand). In addition, with respect to our North American operations and processes, the development and implementation of an action plan began during the reporting period to

improve corporate practices. Priority actions have guided this approach to preventing and managing human rights risks, including a review of internal policies and practices.

## **2. CONCERNING THE SHELTERLOGIC GROUP, INC.**

The Shelterlogic Group, Inc. is a global manufacturer and distributor of shade, shelter and other outdoor products for various commercial and consumer applications, including sheds, garages, greenhouses, gazebos, beach chairs, camp chairs and pop-up canopies. The Company has a global distribution footprint serving various renovation centers, big box retailers, garden boutiques and various e-commerce platforms.

The Company has an annual turnover of approximately \$300 (per million) and employs approximately 650 people, subject to seasonal demand. The Company's head office is located in Watertown, Connecticut, USA, its Canadian subsidiary is located on the South Shore of Montreal, Quebec, several US warehouses (6) and Canadians (2) are available for product distribution. In addition, its main factories are located in China (Binhai and Taizhou), Breese, Illinois, USA and Watertown, Connecticut, USA. The company operates in more than 20 different countries.

## **3. SUPPLY CHAINS**

The Shelterlogic Group, Inc. recognizes that products made in the United States have a lower risk of forced or child labour. In fiscal year 2023, the company acknowledges purchasing raw materials from approximately 25 suppliers. Of these suppliers, 94.5% were located in the United States and 5.5% in China and other Asian countries. Through its culture, values and practices, the company has informally incorporated human rights measures into its production activities, including social and environmental management, health and safety, procurement and human resources.

With respect to operations abroad, through annual audits, the Shelterlogic Group, Inc. takes the following steps to prevent the risks of forced and child labour in its operations and supply chain:

- Work with an external third party to assess risks;
- Develop and implement an action plan to address forced and child labour where there is a risk;
- Develop and implement due diligence procedures and processes to identify, address and prohibit forced and child labour in our operations and supply chain;
- Develop and implement anti-fraud labour and labour contractual clauses;
- Develop and implement labour and child labour standards and codes of conduct (minimum age, maximum hours per week, adequate environment, etc.);

- Establish field teams to increase risk monitoring and follow-up;
- Develop reference and training materials on forced and child labour awareness as required.

These various measures are described in detail in the various audit reports that can be provided.

However, the company acknowledges that these suppliers may in turn have purchased products originating, remanufactured or distributed by other countries. Before partnering with a partner, Shelterlogic Group, Inc. assesses industry practices and internal processes that could improve transparency and reduce partner risk.

#### **4. DUE DILIGENCE POLICIES AND PROCESS**

Other than its daily values and good practices, Shelterlogic Inc. does not have clear, written and published processes, laws or requirements related to forced and child labour, but the company is committed to implementing policies that specifically address the prevention and mitigation of forced and child labour, even though no incidents have been reported since the existence of the latter. In addition, the Company has a Code of Conduct that respects high moral and ethical principles and sets out the basic standards of conduct for those who do business with the Shelterlogic Group, Inc. The Shelterlogic Group Code of Conduct :

- Includes zero tolerance for exploitation of child labour or other human rights violations;
- Describes our commitment to socially responsible performance, including ensuring that there is no forced or child labour in the workplace or in our supply chain;
- Requires employees and contractors to comply with applicable laws and regulations in the countries where they operate.
- Explains that Shelterlogic Group, Inc will not tolerate the use of forced labour, child labour or human trafficking of any kind in its operations or supply chain.

One of the most important ways to ensure ethical business practices is to encourage employees, directors, officers, shareholders and other stakeholders to express themselves or ask questions about situations that may violate laws, internal policies or the Code. The Board is responsible for overseeing the application of its Code in accordance with applicable laws, regulations, policy and procedure.

The Company is committed to continuing the strengthening of policies, ensuring that suppliers adhere to these policies, and adjust processes so that risks of forced and child labour in businesses and supply chains are identified and addressed appropriately.

## **5. RISK ASSESSMENT AND CORRECTIVE ACTIONS**

Shelterlogic Group Inc. believes that building long-term and trusted business relationships with its business partners and suppliers can improve the overall performance of the Company, but also contribute significantly to meeting the zero-tolerance standard for forced and child labour within the organization and its supply chain.

While the Shelterlogic Group, Inc. has never been at fault for forced or child labour, the Company recognizes that the risk exists in the industry, given that supply chains, including those of suppliers, extends to areas at increased risk of forced and child labour.

In this context, Shelterlogic Group Inc. values large suppliers who are well-established and reputable organizations with a history of good relationships with the company, whether local, national or overseas. The Company's largest suppliers generally have high human rights standards, as well as procurement policies that discourage the use of forced and child labour.

## **6. TRAINING**

During the reporting period, Shelterlogic Group, Inc. did not provide or had to provide training to employees on human rights issues, but it is committed to acting ethically and with integrity in all business relationships that represent the organization's core values and that will continue to explore ways to improve its human rights training practices.

## **7. ASSESS THE EFFECTIVENESS OF OUR APPROACH**

Shelterlogic Group, Inc. is continually reviewing practices and developing an action plan and will implement measures to assess the effectiveness of preventing and reducing the risks of forced labour and child labour in its activities and chains supply on an ongoing basis.

This report has been approved by the Board of Directors of Shelterlogic Group Inc. pursuant to subparagraph 11(4)(b)(ii) of the Canadian Act and constitutes our group's report and statement for the fiscal year ending December, 31st 2023.

In accordance with the requirements of the Canadian Act, and in particular section 11 of the Act, I certify that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge and due diligence, I certify that the information contained in the report is true, accurate and complete in all respects important to the administration of the Canadian Act, for the reporting year indicated above.

I have the power to bind the Shelterlogic Group, Inc.



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James Raymond, CEO

May 30, 2024

Date