

SiteOne Landscape Supply – 2023 Modern Slavery Report

1. Introduction

This Report is produced by SiteOne Landscape Supply, LLC and its two wholly-owned Canadian subsidiaries, SiteOne Landscape Supply, Ltd. and Atlantic Irrigation of Canada, Inc. (collectively “SiteOne” or the “Company” or “our” or “we”), for the financial year ending December 31, 2023 (the “Reporting Period”) and sets out the steps taken to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Company.

This Report constitutes the first report prepared by the Company pursuant to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

2. Steps to Prevent and Reduce Risks of Forced Labor and Child Labor

At SiteOne, we must do everything with the highest degree of integrity; and thereby earn the trust of our fellow associates, our customers, our suppliers, our shareholders and the communities in which we operate. This fundamental core value of Doing Business the Right Way is essential to creating a Great Place to Work – one with integrity, trust and mutual respect. This includes not only complying with laws and regulations, but also operating our business with the highest degree of ethical conduct with no shortcuts or exceptions. By incorporating these principles into our everyday culture, we can continue to build a great company and set the example for our industry.

In general terms, we took the following steps during the Reporting Period to prevent and reduce the risk of forced labor or child labor in our business and supply chains:

- assessed our business’s impact on our stakeholders, through oversight by our Board of Directors (“Board”) and management and sustainability reporting;
- reviewed and updated our Human Rights Policy in October 2023;
- continued conducting due diligence of our potential suppliers before entering into our contracts;
- trained our associates on certain business ethics topics; and
- invested further in our ability to communicate and interact with our suppliers via an online supplier portal.

Details of the above actions are set out in this Report.

3. Structure, Activities and Supply Chains

SiteOne Landscape Supply, LLC is incorporated under the laws of the State of Delaware, United States. The common shares of SiteOne’s parent company (SiteOne Landscape Supply, Inc) are listed on the New York Stock Exchange. SiteOne Landscape Supply, Ltd. and Atlantic Irrigation of Canada, Inc. are incorporated under the Ontario Business Corporations Act.

SiteOne’s headquarters are located in Roswell, Georgia.

SiteOne is a wholesale distributor of landscape supplies in the United States and Canada. Our customers are primarily residential and commercial landscape professionals who specialize in the design, installation, and maintenance of lawns, gardens, golf courses, and other outdoor spaces. As of the end of the Reporting

Period, we had over 690 branch locations in 45 U.S. states and six Canadian provinces. Through our expansive North American network, we offer a comprehensive selection of approximately 160,000 stock keeping units including irrigation supplies, fertilizer and control products (e.g., herbicides), hardscapes (including pavers, natural stone, and blocks), landscape accessories, nursery goods, outdoor lighting, and ice melt products to green industry professionals. We also provide value-added consultative services to complement our product offerings and to help our customers operate and grow their businesses.

As of the end of the Reporting Period, we employed approximately 7,800 associates.

We source our products from approximately 5,500 suppliers, including the major irrigation equipment manufacturers, turf and ornamental fertilizer/chemical companies, and a variety of suppliers who specialize in nursery goods, outdoor lighting, hardscapes, and other landscape products. We work to develop strong relationships with a select group of suppliers that we target based on a number of factors, including brand and market recognition, price, quality, product support, service levels, delivery terms, and their strategic positioning.

Virtually all of SiteOne's Canadian business is conducted through SiteOne Landscape Supply, Ltd. and Atlantic Irrigation of Canada, Inc. SiteOne Landscape Supply, LLC imports certain products into Canada for sale and distribution by SiteOne Landscape Supply, Ltd. and Atlantic Irrigation of Canada, Inc.

4. Policies, Governance and Due Diligence Processes

a. Sustainability Oversight and Initiatives

SiteOne is committed to including human rights considerations into its policies, governance framework and decision making. At SiteOne, we believe our operational initiatives drive value across all five objectives in our Vision and will continue to make us stronger and more resilient for many years to come. Our sustainability strategy is an important component of this overall strategy that helps ensure we remain the employer of choice in the Green Industry and a valued partner to our customers and suppliers—regardless of the challenges that external factors may bring.

We believe strong corporate governance promotes the long-term interests of stockholders, strengthens Board and management accountability and helps build public trust in our company. The Board and its committees have adopted policies and processes that foster effective board oversight of critical matters such as strategy, risk management—including human rights. Our Board, specifically the Nominating and Corporate Governance Committee (“NCGC”), oversees our corporate responsibility initiatives, including policies and operational controls of social risks, and is committed to supporting our efforts to operate as a good neighbor in our communities. The Board amended the NCGC Charter in 2021 to document its responsibility for sustainability oversight. In furtherance of these responsibilities, the NCGC meets quarterly and receives routine reports on the company's sustainability strategy, initiatives and policies at each of its meetings.

b. Human Rights Policy

SiteOne is committed to protecting and advancing human rights in all of the communities in which we operate. We are guided by our Core Values, which are the standards by which we conduct our business. Our Core Values summarize our responsibilities to our associates, our customers, our communities, our suppliers and our shareholders. Consistent with our Core Values, SiteOne has identified principles outlined

in its Human Rights Policy in which we will protect and advance human rights in the conduct of our business operations. All SiteOne associates and SiteOne suppliers, contractors and other business partners are expected to comply with the Human Rights Policy. Our Human Rights Policy was last updated in October 2023.

Specifically, the Human Rights Policy states that “SiteOne will not tolerate the use of child or forced labor, slavery, or human trafficking in any of its operations and facilities. We will not tolerate the exploitation of children or the trafficking, physical punishment, abuse, or involuntary servitude of any worker. We expect our suppliers and contractors with whom we do business to uphold the same standards.”

The Human Rights Policy applies to every employee and officer of SiteOne. Board-level oversight on human rights is provided by the NCGC. We will consult with relevant internal and external stakeholders to understand any human rights–related concerns and any necessary action that may be inconsistent with the Human Rights Policy.

If any of our stakeholders have a concern relating to human rights, they are encouraged to anonymously report the concern through our independent, 24-hour Compliance and Ethics Hotline at 1-844-650-0008 (English) or 1-800-216-1288 (Spanish). The availability of the Hotline is proactively communicated to associates as part of our training programs and resources.

The Human Rights Policy can be found here: <https://investors.siteone.com/~media/Files/S/Siteone-IR/governance-documents/site-2023-human-rights-policy.pdf>.

c. Supplier Code of Conduct

Part of our Vision is to be the distributor of choice for our suppliers. As part of our partnership with suppliers, we require that suppliers adhere to our Supplier Code of Conduct. Suppliers are required to acknowledge and agree to compliance with the Supplier Code of Conduct at the time of onboarding to our supplier portal. Our Supplier Code of Conduct was last updated in October 2022.

Specifically, respect for human rights is a fundamental principle identified by SiteOne in the Supplier Code of Conduct. Suppliers that choose to work with SiteOne are expected to embody the same principle. Consistent with our Human Rights Policy, compliance with the Supplier Code of Conduct requires that all persons involved with the manufacturing of products that SiteOne distributes adhere to the laws and regulations prohibiting human trafficking, slavery, bonded or indentured labor, forced labor, child labor and prison labor. Suppliers must adhere to the minimum employment age limit defined by national law or regulation. In the past, SiteOne representatives have toured supplier factories prior to undertaking a business relationship. During SiteOne’s factory tours, representatives observed and considered work conditions as part of its business relationship evaluation. In 2024, SiteOne engaged a third party capable of conducting supplier audits in the future.

The Supplier Code of Conduct can be found here: <https://investors.siteone.com/~media/Files/S/Siteone-IR/governance-documents/site-2023-supplier-code-of-conduct.pdf>.

d. Business Code of Conduct and Ethics Policy

Each day we strive to be fair and consistent, to comply with the laws that govern our activities, and to notify others when something needs to be corrected. Our Business Code of Conduct and Ethics (“Business Code of Conduct”) provides us with guidance in making the right choices when called upon to do so. The

Business Code of Conduct is intended to provide SiteOne associates with straightforward information about SiteOne’s operating principles and offer tools to help decision-making align with our ethical expectations and legal obligations. Adhering to the highest ethical standards is critical to SiteOne’s success and is one of our fundamental core values – Doing Business the Right Way. The Business Code of Conduct applies worldwide to all associates of SiteOne, inclusive of SiteOne controlled subsidiaries as well as all members of the Board.

The Business Code of Conduct can be found here:

<https://investors.siteone.com/~media/Files/S/Siteone-IR/governance-documents/siteone-business-code-of-conduct-and-ethics-v-1.pdf>.

e. Supplier Engagement

Since we have over 5,000 suppliers, we are developing a supplier portal that will allow us to streamline communications with suppliers in a consistent way. We think the supplier portal will offer future capabilities which may allow us to further influence the conduct of our suppliers.

Additionally, our SiteOne Supplier Agreement, which is our standard contractual agreement with our suppliers, requires compliance with all applicable laws and environmental standards. These contractual provisions are consistently included in all of our supplier contracts.

f. Compliance and Ethics Reporting

Should employees or suppliers have concerns regarding forced or child labor, they have a responsibility to report their suspicions. To that effect, SiteOne provides multiple channels for them to report any potential breach, on a confidential basis or not, including:

- to colleagues, including supervisors, human resources representatives, legal department representatives, internal audit representatives or next level of management; or
- if any of our associates or other stakeholders have concerns relating to our ethical business practices, they are encouraged to anonymously report the concern through our independent, 24-hour Compliance and Ethics Hotline at 1-844-650-0008 (English) or 1-800-216-1288 (Spanish). The availability of the Hotline is proactively communicated to associates as part of our training programs and resources. Every hotline complaint is sent by the independent operator to distribution groups based on the nature of the complaint. For example, our Executive Vice President, Human Resources, is alerted for human resources–related issues. SiteOne’s internal audit team receives every complaint, regardless of the nature of the complaint. All allegations are appropriately investigated.

5. Assessing and Managing Our Risk

While we have not conducted a comprehensive risk assessment, our supply of goods and services is governed by a certain number of operating philosophies and principles that guide our strategies and practices. We recognize that we have a duty to use our influence to fight forced labor and child labor, and all members of the supply chain have a role to play in that regard. We rely on the cooperation of all our suppliers and expect them to meet the highest standards of quality and ethics, as defined in our various policies and codes of conduct, and as discussed at greater length in this Report.

Our Category Management team procures products from suppliers and evaluates suppliers adherence to our principles and policies when assessing a partnership. The Category Management team works with our Legal team to ensure that supplier agreements include compliance with legal requirements and ethical practice standards. In addition to the requirements described above regarding the Code of Ethics and Supplier Code of Conduct, a standard phrase found in the applicable terms and conditions of our agreements with our suppliers stipulates that suppliers must adhere to applicable law. These contractual provisions are consistently included in all of our supplier contracts.

6. Remediation Measures

During the Reporting Period, we did not identify any incident of forced labor or child labor in our activities. We therefore did not take any measures to remediate an incident of forced labor or child labor. If we do identify incidents of forced labor within our activities, we will take the appropriate remediation strategies in compliance with our policies, applicable law and industry standards.

Additionally, no loss of income resulting from measures taken to eliminate the use of forced labor or child labor was identified during the Reporting Period. Therefore, no measures were taken to remediate such loss of income.

7. Training

SiteOne's employees receive regular training on ethical topics and our policies. We provide internal training resources on our Business Code of Conduct to help our associates comply with the policy. This includes topics like conflicts of interest, relationships with customers and suppliers, gifts, antitrust competition, confidentiality, protecting company assets, insider trading, foreign corrupt practices and anti-bribery. We also ask that all associates, including management, review and acknowledge our Business Code of Conduct on an annual basis.

8. Assessing Effectiveness

SiteOne has in place a number of policies and measures to prevent and reduce the risk that forced labor or child labor is used in our activities and supply chains, as discussed in this Report. While we have not yet taken any actions to assess the effectiveness of those actions, SiteOne intends to assess its effectiveness in preventing and reducing risks of forced labor and child labor in its activities and supply chains at a later stage.

9. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Managers of SiteOne Landscape Supply, LLC.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this 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 SiteOne Landscape Supply, LLC.

Signature: 

Name: Briley Brisendine

Title: Manager

Date: 5/22/24