

Report: Actions taken concerning the Modern Slavery Legislation

1. Policy Created to make official the company's stance towards compliance with the legislation (policy attached further along in this document)
2. Conducted an internal assessment with our purchasing team and management to see where along the line we may be at risk of exposure
 - a. Discovered that the only vulnerable area would be if our suppliers were sourcing the goods they sold via means of child or forced labour
3. Spoke with legal counsel (MLT Aikens) about how to best confirm our compliance
4. Developed a plan on of requiring vendors over a certain \$ threshold to provide statements of compliance with the policy. For smaller vendors where a more formal PO is sent, language is being added to say that by accepting the PO, the supplier is also confirming their compliance with the Modern Slavery act.
5. Sent out statements of compliance to our suppliers and documented them for audit purposes when they were returned

2024 Attestation: Superior Millwork Ltd.

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.

Aaron Bird



Director of Finance

April 18, 2024

I have the authority to bind Superior Millwork Ltd.

Forced and Child Labour Policy

Purpose:

The purpose of this policy is to ensure that every reasonable effort has been made to make the company's supply chains compliant with Bill S-211 passed May 11, 2023 by the House of Commons.

Scope:

This policy is applicable to all employees making or overseeing purchasing activities at the company.

Policy:

All employees, making or overseeing purchases, are responsible to ensure that any purchases are being made in an ethical manner free and devoid of any known forced or child labour from the supplier.

Vendors for whom annual purchases exceed \$100,000 have signed a declaration of compliance [see Appendix 1].

System generated purchase orders state on each purchase order that "acceptance of this purchase order is treated as a guarantee that the goods and/or services being sold are free and devoid from any forced or child labour".

Responsibilities:

Purchasing is responsible for the maintenance and monitoring of this policy as well as the collection of vendor certificates of compliance.

The Director of Finance will file the compliance report annually prior to the deadline of May 31 each year.

Non-compliance:

Non-compliance of this policy could leave the company exposed to a fine of up to \$250,000 and any violations will be taken seriously.

Any misrepresentation on the part of a supplier will result in termination of that business relationship and may result in legal action if the company received fines due to a supplier's misrepresentation.

Appendix 1:

Date:

Re: Compliance with Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act*

_____ (The Supplier) certifies that, to the best of its knowledge and ability, it has neither purchased nor made available for sale to Superior Cabinets (The Company), any products or services derived from forced or child labour. Further, The Supplier agrees to immediately bring to the attention of The Company any discovered instances of forced or child labour within The Supplier's supply chain.

In the case that The Supplier intentionally continues to source products or services made through the use of forced or child labour, The Company will terminate it's business dealings with The Supplier.

I, _____, certify that I am authorized to make this declaration on behalf of The Supplier.

Signature:

Name:

Title:

Date Signed

Definitions as per Bill S-211

child labour means labour or services provided or offered to be provided by persons under the age of 18 years and that

- **(a)** are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- **(b)** are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- **(c)** interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- **(d)** constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999. (*travail des enfants*)

forced labour means labour or service provided or offered to be provided by a person under circumstances that

- **(a)** could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- **(b)** constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930. (*travail forcé*)