

Statement on Fighting Against Forced Labour and Child Labour in Supply Chains Act

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by Sydney James Management Inc and related group of companies (Warehouse Group) to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing January 2, 2023 and ending December 31, 2023.

Introduction

Warehouse Group is Canada's local hangout. We pride ourselves on being movers and shakers in the restaurant industry. We like to have fun and offer "bang for your buck" in our food and beverage offerings. We are committed to building safe and ethical environments in our communities and earning the trust of our customers and employees by doing the right thing.

For over 20 years, we have established roots in our communities across Canada and in Washington State. We currently reside in British Columbia, Alberta, Ontario, Quebec and Seattle. We do business under the names El Furniture Warehouse, Le Bureau de Poste and Dime Roadhouse. Our supply chains are local, national and international. We are committed to ensuring we operate in a manner that protects human rights and freedom from forced and child labour.

The Warehouse team strives to create a welcoming and fun environment for all our guests, employees, contractors and vendors. We are a team of good people who do the right thing. Our Code of Conduct sets out the guidelines for our teams to ensure they conduct themselves in a manner that is aligned with Warehouse Group core values.

Our Core Values are:

We Are All Dishwashers - Collaborate, support, teamwork, inclusive, flexible, open minded.

No Assholes - Be kind, respectful, approachable, welcoming.

Party Face, Check! - Glass half full, optimistic, positive attitude.

Actions Matter - Do what you say: integrity, reliable, trustworthy.

Be the Reason - Accountable, awareness, guest centric, everything is connected.

Corporate Structure

Warehouse Group was established in 2003. All our restaurants are all privately owned and operated corporations. Our head office is located in Port Coquitlam, British Columbia with a satellite office in Montreal.

Warehouse Group is a national business with over 700 employees across Canada. We have created a comprehensive code of conduct for all employees. The code currently covers fair labour practices and anti-discrimination.

We uphold the principle that all employment must be voluntary, and workers must have the freedom to leave their employment at any time without penalty. We prohibit the employment of individuals under the legal minimum wage for work, as defined by local legislation and regulations, or under the age of 18, whichever is higher. We recognize the importance of protecting young workers by providing appropriate working conditions and adhering to relevant labour standards.

Activities

Warehouse Group restaurants operate as freestanding restaurants on street fronts in mainly metropolitan areas. We are known for our delicious, affordable food and drink. Our staff take our Friday Night Every Night mission to the next level by providing a unique and fun atmosphere.

We are also a restaurant management company which provides our restaurant companies with culinary and beverage expertise and product sourcing. We also provide full administration, accounting and human resource services.

Warehouse Group also buys and sells restaurant glassware and bar products to large distributors.

Supply Chain

Warehouse Group sources a wide range of products, including but not limited to food, beverages, smallware, disposables, cleaning supplies, furniture, equipment and branded merchandise and uniforms.

When choosing our supply chain partners, we look for the best in the business. Our main suppliers of all food, supplies, alcoholic and non-alcoholic beverages are large, reputable, national companies that are publicly traded. These partners have corporate social responsibility teams and hold memberships with national supply chain task forces the support actions to end human rights violations.

Risks in Supply Chain

We acknowledge that there is a potential risk of forced labour or child labour in our supply chain. Our current long-term partnerships are global leaders in distributing beverages, food products and related food service supplies to restaurants and other hospitality businesses. They source ethnic, international brands from all over the world, as well as locally sourced products.

We strongly oppose slavery and human trafficking, in any form, and want to eliminate any possibility of association with it in our own operations, the operations of our suppliers and our subcontractors. We aim to work with suppliers that share our values and goals.

Risk Assessment

In 2024, Warehouse Group will begin the process of engaging with supply partners on the issue of addressing forced and child labour. We intend to develop a mapping and risk assessment process. We will be identifying potential adverse impacts of our suppliers' practices and will be creating a detailed map of the supply chain, to understand exactly where their products and services originate. When assessing their practices, we will be focusing on labor conditions, environmental impact and ethical standards. Our focus will be on high-risk regions or industries.

We will develop a Supplier Code of Conduct that will address the risk of forced and labour in our supply chains, both with new and current partners. To regularly evaluate and ensure compliance with ethical standards and regulations, we will establish a due diligence process. This will include, but not be limited to, supplier attestations confirming their due diligence, onsite visits and annual questionnaires. We look forward to collaborating on industry initiatives to share best practices and learn from others, in order to enhance our approach to identifying and mitigating adverse impacts.

Remediation

We expect Warehouse Group employees, contract workers and supply partners to demonstrate integrity and adhere to the laws and regulations in all operating jurisdictions. Any instances of failure to meet these expectations will be thoroughly reviewed and addressed.

Corrective action will include engaging in discussions with the supplier and monitoring progress until resolved. It may also include terminating relationships with non-compliant suppliers, providing remediation for affected workers and reporting violations to authorities.

Training

All directors and managers of the procurement team will be provided with an overview of this new legislation and how it will impact our operations and supply chain.

We are committed to raising awareness among employees and stakeholders about the risks of forced and child labour and their responsibilities in upholding this policy. To achieve this, we will develop and implement training programs to ensure that employees understand the importance of compliance and are equipped to identify and address potential violations. These will include mandatory training and workshops highlighting real life examples to illustrate the impact and consequences of non-compliance. We will gather feedback to continuously improve the training programs and address any gaps or concerns.

Conclusion

Warehouse Group is committed to promoting ethical business practices and protecting human rights throughout our operations and supply chain. By adhering to this policy, we demonstrate our dedication to combat forced labour and child labour, thereby contributing to a more just and sustainable world.

This policy offers a framework for addressing forced labour and child labour in accordance to Canada's Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31, 2023.

It has been issued on behalf of Warehouse Group and approved by its board of directors.

Signed,



Dan Wilson

May 25, 2024