

Vankam Holdings Ltd Consolidated Statement on Addressing the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023

Signed: May 30, 2024

Introduction

This statement sets out Vankam Holding Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2023.

As part of Real estate and rental and leasing industry as well as Health Care and Accommodation services the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

1. Organizational structure, activities and supply chains

This statement covers the activities of Total Concept Developments Ltd, The Vista Inn Inc, Kamvan Holdings Ltd, All Care Canada (Sidney) Inc, Kampark Inc, VF Enterprises Ltd, McArthur Island Inc and V7 Properties Ltd

- Vankam Holdings Ltd is a corporation based in Kamloops, BC Canada and is the controlling entity for the Canadian corporations listed. Vankam does not operate internationally. In 2023 Vankam Holdings Ltd had generated consolidated revenues of CAD \$52 Million and holds consolidated assets of CAD \$122 Million. As of May 2024 there were approximately 150 employees. This consolidation includes:
 - Total Concept Developments Ltd & McArthur Island Inc – Development and sales and rentals of residential properties. First Tier Suppliers are Canadian based companies. Protocols to be put in place to ensure First Tier Suppliers are mapping supply chains and evaluating modern slavery and human trafficking risks
 - The Vista Inn Inc – Accommodation services. Mapping of supply chains for 2nd and 3rd tier suppliers. First Tier Suppliers are Canadian based companies. Protocols to be put in place to ensure First Tier Suppliers are mapping supply chains and evaluating modern slavery and human trafficking risks
 - Kamvan Holdings Ltd & VF Enterprises Ltd & Kampark Inc – Commercial leasing. Mapping of supply chains for 2nd and 3rd tier suppliers. First Tier Suppliers are Canadian based companies. Protocols to be put in place to ensure First Tier Suppliers are mapping supply chains and evaluating modern slavery and human trafficking risks
 - All Care Canada (Sidney) Inc – Long term Senior Care - Mapping of supply chains for 2nd and 3rd tier suppliers. First Tier Suppliers are Canadian based companies. Protocols to be put in place to ensure First Tier Suppliers are mapping supply chains and evaluating modern slavery and human trafficking risks

- V7 Properties Ltd – Residential Rentals and Management of non- arms length companies - Mapping of supply chains for 2nd and 3rd tier suppliers. First Tier Suppliers are Canadian based companies. Protocols to be put in place to ensure First Tier Suppliers are mapping supply chains and evaluating modern slavery and human trafficking risks

The organisation currently operates in the following countries/regions:

- Canada
 - Ontario for McArthur Island Inc
 - British Columbia primarily for Total Concept Developments Ltd, The Vista Inn Inc, Kamvan Holdings Ltd, All Care Canada Inc, All Care Canada (Sidney) Inc, Kampark Inc, VF Enterprises Ltd and V7 Properties Ltd

2. Policies and due diligence processes in relation to forced labour and child labour

a. **Policies:** The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. This policy is currently being developed wherein suppliers will be required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation will work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

b. Due diligence processes:

The organisation undertakes due diligence when considering taking on new suppliers, and will regularly review its existing suppliers. The organisation's due diligence and reviews will include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier,
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

The parts of the business and supply chains that carry a risk of forced labour or child labour, and the steps taken to assess and manage that risk

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Senior Management evaluates potential for an activity being high risk. With all of our business being in Canada and our suppliers being from Canada it is presumed that this risk is low, however, diligence to reviewing new and existing supply chains will be explored.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- There is no activity or supply that in our opinion is of high-risk. Diligence to ensuring supply chains and business practices stay aligned with our commitment to zero tolerance for modern slavery will be put into practice

Risk management

The following are the steps taken to manage higher risk areas:

Any measures taken to remediate any forced labour or child labour

During the year ended December 31, 2023, the organization did not identify any instances of forced or child labour within the organization or its supply chains.

Any measures taken to remediate loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

During the year ended December 31, 2023, the organization did not identify any instances of forced or child labour within the organization or its supply chains.

The training provided to employees on forced labour and child labour

The organisation will require all Senior Management within the organisation to complete training on modern slavery. This training will be sought out and completed in 2024.

The organisation's modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

In the coming fiscal year Vankam Holdings Ltd will analyze Quality improvement measurements that can provide information as to the affective of our policies in ensuring that forced labour and child labour are not being used in its businesses and supply chains

Approval

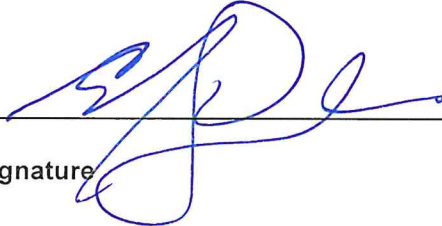
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Cornelis VanDongen

President

Date: *May 30, 2024*

I have the authority to bind Vankam Holdings Ltd and the related entities identified


Signature