



May 28, 2025

Our curated assortment of durable, useful products come from suppliers all over the world. We believe in treating our suppliers like friends, built on a foundation of mutual respect and shared ethical sourcing principles.

As part of our commitment to ethical practices, we created a Supplier Code of Conduct that governs all transactions with our suppliers. This Code was formalized in August of 2022, requiring our suppliers understand and attest to compliance with all laws, regulations, and policies applicable to them and their dealings with Lee Valley including those related to forced and child labour, employment, safety, trade and the environment.

Similarly, in 2023, Canada introduced Bill S-211 with legislation aimed to specifically combat forced and child labor in supply chains and promote awareness and transparency within the industry.

In our ongoing efforts to cultivate awareness and prevent the use of forced or child labor, we undertook several measures throughout 2024. These initiatives included ongoing training for our sourcing and supply chain teams on our policies and the implementation of our Supplier Code of Conduct in practice, ensuring our Code is effectively and continually communicated to all our suppliers with every purchase. As well, we maintain an awareness campaign with our suppliers, continuously socializing our Code and compliance requirements.

As part of this code, we stipulate that:

- Freely Chosen Employment: Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons shall not be used.
- Young Workers - Child labour is not to be used in any manufacturing stage.

By accepting and fulfilling a purchase order with us, our suppliers attest that they have taken all reasonable measures to meet the standards outlined in this Code and are responsible for bringing forward any instances of noncompliance.

Additionally, we ensure that we do not engage in business with any suppliers located in the Uyghur region of China – a region known to pose a significant risk of forced labor and child labor.

In this time, we encountered no instances requiring remedial measures or loss of income measures to vulnerable families due to forced or child labor within our supply chain.

Given these measures, we believe we have effectively fostered awareness, transparency and compliance regarding forced and child labour in our business and supply chain.

Lee Valley Tools Ltd., is a privately held retailer of tools for woodworking and gardening, with physical retail and distribution centers located across Canada in the USA, and employs over 900 people throughout the enterprise. We have over 20000 active products that are supplied from over 1500 suppliers.



Attestation

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.

Nicole O'Reilly
Chief Financial Officer
May 28, 2025

A handwritten signature in cursive script, appearing to read "No. O'Reilly".

I have the authority to bind Lee Valley Tools Ltd.