

Steps Taken by the NCC Investment Group in 2024

To prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada, NCC Investment Group developed and maintained a grievance mechanism. Specifically, the NCC Investment Group had in place a reporting process (via its Human Resources Policy) applicable to its corporate and trade divisions, which enables employees to report all illegal acts anonymously.

POLICIES AND DUE DILIGENCE PROCESSES

NCC Investment Group Policies and Processes

While the NCC Investment Group did not have any specific due diligence processes in relation to forced labour and/or child labour, in 2023, the NCC Investment Group maintained several policies and processes which indirectly helped to manage and identify child labour and forced labour concerns, including:

- a) NCC Investment Group's corporate division HR Policy that guides the hiring and recruitment process and specifies that references checks are conducted during the hiring and recruitment processes.
- b) NCC Investment Group has in place badge provision practice at their offices. Office staff can only be granted access to buildings via the use of a fob. For construction site access, site superintendents are only allowed to admit authorized employees entry to the site.

FORCED LABOUR AND CHILD LABOUR RISKS

NCC Investment Group has not started the process of identifying risks in their supply chains for the 2024 reporting period. However, on a go forward basis, the group will endeavour to turn their minds to the potential risks of child and forced labour in their supply chains.

REMEDIATION MEASURES

NCC Investment Group has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

REMEDIATION OF LOSS OF INCOME

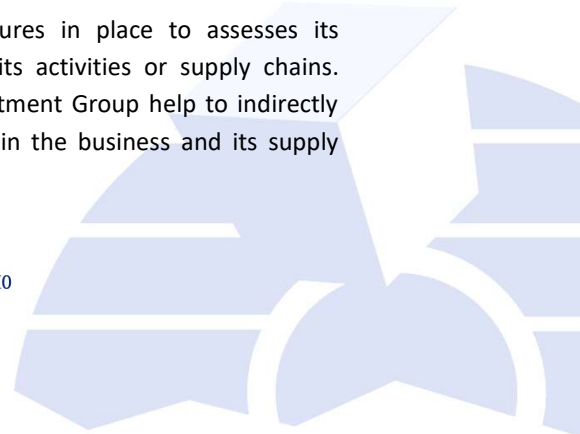
NCC Investment Group has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

TRAINING PROVIDED TO EMPLOYEES

In 2024, NCC Investment Group did not provide training to its employees on forced labour or child labour. NCC Investment Group is in the process of assessing and developing forced and child labour training for relevant employees for implementation in subsequent reporting years.

ASSESSING EFFECTIVENESS

NCC Investment Group does not currently have policies and procedures in place to assess its effectiveness that forced labour or child labour is not being used in its activities or supply chains. However, as outlined above, the processes and policies of the NCC Investment Group help to indirectly identify and manage potential forced labour and child labour risks within the business and its supply chain.



APPROVAL AND 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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of the NCC Investment Group have executed this report as of the effective date of the signatures set out below.

SIGNED)
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May 22, 2025)
Date)
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NCC INVESTMENT GROUP INC.

Per: 
Name: David Kakuktinniq
Title: Director of NCC Investment Group

I have authority to bind NCC Investment Group Inc.

SIGNED)
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May 22, 2025)
Date)
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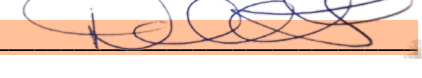
NCC PROPERTIES LIMITED

Per: 
Name: David Kakuktinniq
Title: Director of NCC Properties Limited

I have authority to bind NCC Properties Limited

SIGNED)
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May 22, 2025)
Date)
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NCC DEVELOPMENT LIMITED

Per: 
Name: David Kakuktinniq
Title: Director of NCC Development Limited

I have authority to bind NCC Development Limited



SIGNED

May 22, 2025

Date

NCC 3000 INC.

Per:

Name: David Kakuktinniq

Title: Director of NCC 3000 Inc.

I have authority to bind NCC 3000 Inc.

SIGNED

May 22, 2025

Date

NUNAVUT LOGISTIC SOLUTIONS INC.

Per:

Name: David Kakuktinniq

Title: Director of Nunavut Logistics Solutions Inc.

I have authority to bind Nunavut Logistic Solutions Inc.



SIGNED

May 22/2025
Date

NCC 3000 INC.

Per: 

Name: Harry Flaherty

Title: Director of NCC 3000 Inc.

I have authority to bind NCC 3000 Inc.

SIGNED

May 22/2025
Date

NUNAVUT LOGISTIC SOLUTIONS INC.

Per: 

Name: Harry Flaherty

Title: Director of Nunavut Logistics Solutions Inc.

I have authority to bind Nunavut Logistic Solutions Inc.



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NCC INVESTMENT GROUP INC.

Per: 
Name: David Omilgoitok
Title: Director of NCC Investment Group

I have authority to bind NCC Investment Group Inc.

SIGNED)
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Title: Director of NCC Properties Limited

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