



#120, 10130 - 112 Street NW
Edmonton, Alberta T5K 2K4
Canada

Modern Slavery Statement

1 Introduction

- 1.1 At Rohit Investments Inc. (“Rohit Group”), we are committed to comply with applicable laws and protect the dignity and rights of people connected to our business.
- 1.2 This is Rohit Group’s first modern slavery statement pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9), and it will be reviewed annually hereafter. We acknowledge that stamping out modern slavery and human trafficking risk is a process that will take time. Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain.

2 Our organisational structure, business operations and supply chains

- 2.1 The Rohit Group comprises **98** entities, including Rohit Investments Inc. where Rohit Investments Inc. is the ultimate parent company and the only entity required to report.
- 2.2 Rohit Group employs **233** people in Canada and has business operations in Alberta, Saskatchewan and Ontario. Its activities include the construction of buildings, sale of buildings and leasing (residential and commercial) in Canada.
- 2.3 The goods used in the manufacture of our products, including all raw materials such as lumber, concrete and other building products, are sourced from suppliers located in Canada. We also purchase fixtures included in our properties in the Canadian market from suppliers located Canada. Our supply chain also includes ancillary services that contribute to our main production operations, such as transporters and carriers. We also purchase some specific materials directly from overseas manufacturers that are custom manufactured to our specifications.
- 2.4 To learn more about our business, please see www.rohitgroup.com.

3 Our supply chain risk profile

- 3.1 Within our operations, we have assessed our risk profile based on sector and industry risks low. All of our workers are employed in Canada where we have fair and responsible employment practices in place to protect and promote workers’ rights.
- 3.2 That said, we recognise that risks of modern slavery may be present in our supply chain in areas such as construction materials and fixtures etc. We are also aware of parts of supply chain contracted/subcontracted labour is used. Since a majority of such workers are not employed directly by Rohit Group, we have less control and visibility over their working conditions and employment terms and we continue

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to tailor our risk management actions to address those risks. Namely, we continue our efforts to classify supplier risks and map key parts of our supply chain to identify and improve our understanding of modern slavery risks.

3.3 Our key operations and supply chains include:

Business operations	Supply chains	Modern Slavery Red Flags
Land Development	Raw land acquisition, planning and permitting, servicing, sale and turn-over to builders	Servicing contractors sourcing of materials may include materials or raw materials from unspecified sources may have risks.
Building Construction	Lot acquisition, planning and permitting, material acquisition, construction, sale and turn-over to end customer	Some materials directly or indirectly sources may come from geographic regions that may have risks. Some unskilled labour may have risks.

4 **Actions taken to combat slavery risks**

None to date.

5 **Our policies on modern slavery**

5.1 We are committed to acting ethically and with integrity in all our business relationships and to enforcing effective systems and controls to prevent modern slavery from taking place in our business and supply chain. We are currently developing our policy and once done.

5.2 Rohit Group makes sure its suppliers are aware of its policies and adhere to the same high standards. Our Master Services Agreement contain a provision that indicates:

“the Supplier hereby confirms that they are fully compliant with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) by implementing effective due diligence measures to prevent the use of forced labour and child labour, as defined in the Act. Additionally, the Supplier shall, if requested by Rohit, provide any necessary information to support our Annual Report as a Reporting Entity defined under the Act;”

6 **Due diligence processes**

6.1 In order to identify and manage risks of modern slavery and human trafficking in our own business, we periodically reassess our employment practices to ensure we meet or surpass employment standards in all jurisdictions in which we operate.

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7 Supplier adherence to our values

- 7.1 Rohit Group seeks to do business with suppliers that have similar values, ethics and moral business practices, including those related to human rights.
- 7.2 We have included anti-slavery provisions in our standard terms and conditions which are used with our suppliers and ensure that such provisions are included in all contracts as appropriate.
- 7.3 To ensure all suppliers and contractors in our supply chain comply with our values, we ask our suppliers to conform to the provision set out in our Master Services Agreement.

8 Training

- 8.1 In order to further develop the above-mentioned policies, we plan to include information regarding modern slavery risks in our relevant employee onboarding materials.

9 Remediation measures

- 9.1 We have not identified any instances of modern slavery or human trafficking in our business and supply chains, therefore, we have not been required to take remedial measures.

10 Remediation measures relating to loss of income to vulnerable persons

- 10.1 We recognise that instances of modern slavery and human trafficking often impact the human rights of particularly vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women, or children. To date, we have not discovered instances of modern slavery in our business and supply chain, therefore, we have not been required to take measures to remediate the would-be loss of income to vulnerable families.

11 Effectiveness in combatting modern slavery risks

- 11.1 To date, Rohit Group has not taken any actions to assess the effectiveness of our actions in preventing and reducing risks of modern slavery in our activities and supply chain.

12 Approval of the Statement

- 12.1 Rohit Group has acted in consultation with key personnel in preparing this statement.
- 12.2 This statement is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes Rohit Group's modern slavery statement for the financial year commencing on January 1, 2024 and ending on December 31, 2024.
- 12.3 This statement was approved by the Board of Directors of Rohit Group pursuant to Paragraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

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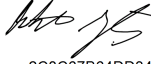
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12.4 In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable 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.

DocuSigned by:

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Signed By: _____
Rohit Gupta, President
Date: May 31, 2025
I have the authority to bind the Corporation

