

Fighting against forced labour and child labour in supply chains report

May 31, 2025

About this Report

Modern slavery refers to forms of contemporary slavery such as forced or compulsory labour, child labour, debt bondage, human trafficking or any other internationally recognized exploitative labour practices. It is a significant global issue impacting different industries, sectors and geographic locations. The Canadian government has committed to preventing and reducing these risks and has established legislation to require certain entities to report on the measures taken in this regard.

Roofcraft Investments Ltd. (“Roofcraft”) recognizes that modern slavery, including forced labour and child labour, is a complex issue that can exist in a variety of forms through global supply chains. Roofcraft recognizes it has an important role to play in safeguarding the rights of its workers, advancing its supply chain transparency, and mitigating the risks of modern slavery.

As a company that has been in operation for more than 20 years, Roofcraft has remained firmly rooted in its foundational values, entrepreneurial spirit, commitment to quality for Roofcraft and across its entire industry.

Scope, Definitions and Boundaries

This joint report is provided in relation to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") and related guidance from Public Safety Canada, for the reporting period of January 1, 2024, to December 31, 2024. The Report outlines the steps Roofcraft, and its subsidiaries have taken for the reporting period related to the prevention and detection of modern slavery within its activities and supply chain.

This Report has been prepared on behalf of **Roofcraft Investments Ltd.** as the sole reporting entity.

Structures, Activities and Supply Chains

Business and structure

Roofcraft is a private Canadian company that focuses on the distribution of a wide range of products and services in Atlantic Canada. Roofcraft operates through an efficient distribution network which includes showrooms, warehouses, and delivery centers, and stands as one of Atlantic Canada's leading distributors of commercial and residential construction products. Roofcraft's success is attributed to its dedicated and knowledgeable employees operating in over 9 sales and distribution centres strategically located throughout Atlantic Canada. By partnering with industry-leading manufacturers, Roofcraft distributes a diverse range of products to meet the needs of construction professionals.

Roofcraft's Corporate offices are located in North York, Ontario, Canada and is home to its corporate functions and executive team. Roofcraft serves its customers through a network of sales and distribution facilities. Each facility strictly adheres to Roofcraft's founding principles and is subject to Roofcraft's corporate standards and processes.

Activities

Roofcraft partners with North American manufacturers and offers a diverse range of products, including residential and commercial construction products. Roofcraft's activities are carried out through two business segments: residential and commercial segments.

- **Residential products** are designed to meet the needs of contractors, designers, architects, and homeowners. Products include plumbing, electrical, fixtures, roofing, insulated concrete forms, landscaping, concrete, sealants and specialized product lines.
- Roofcraft also offers products for a range of **Commercial Products** including plumbing, heating, electrical, concrete, masonry, insulated concrete forming, bridge and highway, soil remediation and stabilization, roofing, painting, tilt-up, insulation, waterproofing and more.

Supply Chain

As a wholesale distributor of construction products and accessories, Roofcraft operates as an intermediary between manufacturers and customers in the construction industry. Through strategic partnerships with manufacturers, Roofcraft procures a wide range of standard and specialized products. These products are then distributed and delivered to customers across Atlantic Canada, catering to the diverse needs of construction and development professionals.

Roofcraft's role as a distributor allows it to focus on the efficient procurement and distribution of construction products and accessories. Roofcraft generally does not engage in the direct sourcing of raw materials. The majority of Roofcraft's suppliers are located in Canada and the United States, where strong workers' rights and human rights legislation are enforced.

Values, Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Policies and Due Diligence Processes

Roofcraft is committed to maintaining the highest standards of ethical conduct in its dealings with employees, customers, and suppliers. As such, Roofcraft has adopted and implemented several policies and practices that support responsible business practices and human rights, which demonstrate Roofcraft's commitment to aligning with applicable laws, fostering safe work practices, and providing an ethical and respectful working environment.

Roofcraft requires that employees, in the execution of their job responsibilities, faithfully observe all legal requirements placed upon them and adhere to a list of policies which include a **Health, Safety and Environment Policy**, a **Health and Safety Policy for Visitors and Contractors**, a **Harassment Policy**, and a **Workplan Violence Policy**, that outlines Roofcraft's Violence and Harassment Prevention Plan which includes policies, procedures, rules, employee training, incident investigation and disciplinary actions.

As part of its commitment to promote a workplace free of violence and harassment and support the emotional well-being of employees with dignity and respect, Roofcraft implemented a **Violence and Harassment Code of Practice** and conducts an annual review of the Code with the participation of safety representatives and the safety committee and adjusts the Code of Practice to ensure it is relevant and applicable to the needs of the organization.

All employees and contractors are expected to support the Occupational Health and Safety Policies, to comply with all safety and health rules, policies, procedures and programs, and to make safety and health part of their routine.

As outlined in our **Health and Safety Policy for Visitors and Contractors**, contractors hired by Roofcraft are required to produce evidence of an occupational health and safety policy or program, as required by legislation. They will also be required to provide evidence of adequate liability insurance and their position of good standing with the Workers' Compensation Board, prior to commencing work.

Going forward, Roofcraft will continue to assess and strengthen policies and due diligence processes to ensure Roofcraft has appropriate measures in place to identify and respond to potential risks of forced and child labour in its supply chain and to reinforce ethics to ensure that honesty, care, and due diligence are reflected in all procurement activities. In 2025, Roofcraft will develop a formal purchasing policy, providing a framework for the procurement practices of goods and services, including respect for human rights and working relationships and conditions.

Assessing the Risks of Modern Slavery in our Operations and Supply Chain/Components of the Business and Supply Chain that Carry a Risk of Forced Labour and Child Labour

In 2024, the majority of Roofcraft's direct suppliers and contractors were located in Canada and the United States where strong labour laws are enforced, therefore Roofcraft considers the risks of forced and child labour within its direct supply chain to be low. Nevertheless, Roofcraft recognizes that due to the complexity of global supply, the risks of forced and child labour may exist in its supply chain. Roofcraft is considering ways to enhance its procedures for identifying and addressing supply chain risks.

Although Roofcraft believes exposure to be minimal due to the majority of suppliers being located in North America, where legal protections largely mitigate modern slavery risks, Roofcraft is evaluating its supply chain risk assessment strategy to determine where risk may be present. Roofcraft are searching for an appropriate solution to proactively identify, evaluate, and mitigate risks of modern slavery in its supply chain.

To date, Roofcraft has not been the subject of any investigation or convicted of any offence under any modern slavery laws.

Measures Taken to Remediate Forced Labour and Child Labour including Remediation of the Loss of Income to the Most Vulnerable Families

Roofcraft has not identified any instances of forced or child labour in its activities and supply chains within the financial year ended December 31, 2024, and therefore, no remediation measures were taken. Roofcraft acknowledges the importance of ongoing monitoring to ensure that forced and child labour risks remain mitigated within its operations and supply chains.

Training

Roofcraft did not provide formal training to employees specific to forced and child labour in 2024.

Assessing Effectiveness

The strongest indicator of effectiveness is the continued circumstance that Roofcraft has not been the subject of any investigation or convicted of any offence under any modern slavery laws. To ensure this is maintained, internal policies, procedures and training will continue to be monitored, maintained and required.

Approval of 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.



I have the authority to bind Roofcraft Investments Ltd.

David Koschitzky

President

May 31, 2025