



Unilock Ltd.

***FIGHTING AGAINST FORCED LABOUR
AND CHILD LABOUR IN SUPPLY CHAINS ACT***

December 1, 2023- November 30, 2024



REPORT PURSUANT TO THE

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Introduction

This statement applies to the activities Unilock Ltd. between December 1, 2023, and November 30, 2024. As a Canadian based organization, with global supply chains, we are committed to acting ethically and with integrity in all of our business dealings and relationships, treating all people with dignity and respect; complying with applicable laws, regulations and treaties and, as part of that, to working collaboratively with our suppliers to identify and reduce the risk of forced labour or child labour occurring anywhere within our supply chains.

Unilock expects our suppliers to operate in accordance with all applicable anti-slavery laws, including those prohibiting human slavery and slavery-like practices, human trafficking, forced labour and child labour, and particularly including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Structure, Activities and Supply Chains

Unilock Group of Companies, operates in both the United States and Canada, with manufacturing facilities positioned in Wisconsin, Illinois, Michigan, Ohio, New York and Massachusetts, and as well as Ontario, Canada, with our head office situated in Etobicoke, Ontario. Unilock Ltd the Canadian Corporation is privately owned, with Canadian majority ownership.

Unilock Ltd is the premier manufacturer and distributor of paving stones and retaining walls in the northeastern U.S. and Canada. In Canada, the lions share of our products, 99%, are crafted in Ontario, with the remaining 1% imported as finished product from the US and overseas.

As of November 30, 2024, our Canadian operations boasted approximately 304 salaried and hourly employees, with the hourly workforce fluctuating according to the seasonality of our business and the staging and timing of projects by our customers.

We maintain state-of-the-art, automated manufacturing facilities, throughout our operations. As of November 30, 2024 our Canadian manufacturing footprint encompassed sites in Georgetown, Ayr, Pickering and Gormley, Ontario. Additionally, we operate a distribution yard in Barrie Ontario, alongside our head office in Etobicoke and sales and administrative staff located across Ontario and southern Quebec.

Procurement at Unilock primarily revolves around acquiring raw materials for our manufacturing process, finished product and equipment. Approximately 85% of our procurement activity is domestic, with suppliers falling under the purview of stringent labour and human rights legislation in Canada and the US. The remaining 15% involves overseas transactions for sourcing raw materials, equipment and finished product. In 2024, Unilock sponsored a third party Human Rights Impact Assessment audit a primary overseas supplier. This HRIA was prepared through a combination of desk research; interviews with key informants and a field visit. This audit examined a number of salient human rights risks in three tiers of the supply chain; Tier 1 can be categorized as the suppliers own factories, tier 2 the subcontractors and tier 3 which are the quarries the suppliers mines.

Once manufactured, our products are distributed through a network of dealers and contractors for installation into commercial and residential projects. This downstream network also falls under the stringent labour and human rights legislation in Canada and US.

We maintain robust relationships with reputable, long-standing suppliers, dealers and contractors, many of whom have implemented systems and processes to mitigate the risk of forced labour within their supply chains. Unilock remains committed to fostering collaborative and diligent engagement with all our suppliers to identify and address any potential instances of forced child labour promptly. 2024 saw the implementation of Unilock Procurement Guidelines that endorse vendor adherence to equitable labor practices, champion diversity and inclusivity, and actively contribute to the betterment of the communities in which they operate.

Policies and Due Diligence Processes related to Forced Labour and Child Labour

Unilock's Code of Conduct Policy sets out the ethical standards that each and every employee must adhere to. Unilock's employees are, under terms of their employment, expected to follow all laws of the county in which they operate. Employees that violate laws or policies are subject to disciplinary action which in certain cases can lead to dismissal.

Policies are in development that require all suppliers to adhere to the most stringent of prevailing national laws and recognized international standards relating to forced and child labour.

We expect all of our suppliers to adhere to Unilock's standards relating to compliance with laws and ethics as a contractual term in each of Unilock's purchase orders. Such standards expect Unilock's suppliers:

- (a) be in, and at all times remain in, full compliance with all applicable laws, including laws related to child labour, forced labour and human trafficking;
- (b) confirm that they have not and will not engage in any activity, practice, or conduct



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that would constitute an offense under any such laws; and

- (c) have in place policies and procedures adequate to ensure compliance with all such laws by its officers, employees, agents and any other third parties or persons associated with the supplier or contractor in the provision of goods or performance of services.

Such obligation of compliance imposed by Unilock on our suppliers is applicable in all jurisdictions in which Unilock or the suppliers operate. If Unilock receives credible evidence that any supplier has not complied with its obligations in that regard, Unilock may: (i) terminate any services; (ii) refuse to take delivery of any goods or services; and (iii) return any goods already delivered, with reimbursement.

The Risk of Forced Labour and Child Labour in our Business and Supply Chains

Unilock will undertake assessments of potential forced labour and child labour in our supply chain. Key factors of the assessments will include risks related to the geographic areas, and industries from where we purchase raw material, equipment and finished product imported into Canada.

In light of the long-term ongoing relationships that has with our suppliers, and the minimal amount of imported goods, Unilock has concluded that we do not believe there to be a calculable risk of forced labour or child labour within our business or supply chains.

Remediation Measures

Unilock believes that there is no identifiable risk in our operations, business or supply chains of forced labour or child labour. Therefore, Unilock has not taken any special measures to remediate any issues of forced labour or child labour or any measures to remediate the loss of income to vulnerable families.

In the event that Unilock is informed of, or discovered, the potential or confirmed presence of forced and child labour in its supply chains, Unilock will investigate, and our response will be practical and proportionate and also consider the human rights impacts of any remediation on those affected, such as loss of employment or income.

Training of Employees

Training is essential for raising awareness and ensuring that our employees and suppliers are confident and equipped to recognize any signs of forced or child labour in their daily operations or supply chains.



At present, Unilock provides mandatory formal training for applicable employees related to forced labour or child labour, including the polices above.

We are, however, committed to improve the training we provide to our current and future employees. Employees who negotiate and execute procurement contracts will be trained on understanding the objectives of the Act; how to identify potential human rights risks when dealing with suppliers; and employee roles and responsibilities in the company's procurement process.

Organization Assessment of Effectiveness of Policies Related to Forced labour and Child Labour

Unilock is committed to supporting the efforts of all bodies working to identify and eradicate forced and child labour. We have recently expanded our Sustainability and Human Resource team, improving our ability to develop and assess policies, as well increasingly assess, and monitor current and prospective suppliers. Our intention is to continually develop, monitor and improve all employee and organizational policies as any deficiencies are discovered.

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 Unilock Ltd. 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 aspects for the purposes of the Act, for the reporting year December 1, 2023 to November 30, 2024.

Signed this 7th day of July, 2025, by Andrew Bryant, President & Chief Executive Officer of Unilock Ltd.

Andrew Bryant

CEO & President

I have the authority to bind Unilock Ltd.