

Report

Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") Public Safety Canada

Entity: Tricar Properties Limited (the "Entity")

Reporting Year: November 1, 2023 - October 31, 2024 (the "Current Reporting Year")

The Entity is a privately owned corporation incorporated under the laws of Ontario that, together with its controlled entity, 'Tricar Developments Inc.' (the "Controlled Entity"), is involved in the development and construction of multi-unit residential buildings in Ontario, Canada and the sale or rental of units within such buildings. The Entity operates within the organization's unofficial trade name, 'The Tricar Group' ("Tricar"). Tricar operates exclusively within Ontario, Canada and employed between 100-200 employees during the Current Reporting Year. There were between 1-5 buildings under construction during the Current Reporting Year and the Entity sold between 50-100 residential units and leased between 100-200 residential units during this time.

The Entity, together with its Controlled Entity, primarily engages with Canadian-based indirect suppliers/resellers in the provision of building materials as well as Canadian-based service providers, installers, and trade entities (collectively, "Vendors"), and requires its Vendors to agree to contract terms indicating their compliance with all federal, provincial and local laws. Although uncommon, the Entity may, from time to time, source building materials directly from manufacturers in Canada, seldomly from USA, and scarcely ever from China.

Upon learning of Bill S-211 receiving Royal Assent on May 11, 2023, the Entity made initial inquiries with its major Vendors into their due diligence practices regarding the risk of forced labour or child labour, which coincided with the conclusion of the initial reporting rear (November 1, 2022-October 31, 2023 (the "Initial Reporting Year"). Following the Initial Reporting Year, the Entity, together with its Controlled Entity, created and implemented a Supplier Attestation Form to be signed by suppliers and/or contractors prior to supplying goods and/or performing services to Tricar, attesting their compliance with the Act and the prohibition of child labour and/or forced labour from their supply chains and workforce. The Entity, together with its Controlled Entity, did not take further additional steps to prevent and reduce the risk of forced labour or child labour during the Current Reporting Year. Additionally, the Entity, together with its Controlled Entity, did not commence the process of identifying parts of its business and supply chains that carry a risk of forced labour or child labour being used and did not provide training to employees or formalize policies or specific due diligence processes related to same during the Current Reporting Year. Accordingly, the Entity, together with its Controlled Entity, did not take any measures to remediate any forced labour or child labour or any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities or supply chains, and did not take actions to assess its effectiveness in preventing and reducing the risks of forced labour and child labour in its business and supply chains during the Current Reporting Year.