

Annual Report

Bill S-211- Fighting Against Forced Labour and Child Labour in Supply Chains Act

Modern Slavery Statement for the Financial Year ended December 31, 2024

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by CaraCo Development Corporation to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing January 1, 2024, and ending December 31, 2024.

Company

CaraCo Development Corporation builds new homes and commercial construction projects in Kingston, Ontario and the surrounding area. It has been in operation since 1986. The head office is located at 234 Concession St. in Kingston, Ontario.

Supply Chain

CaraCo Development Corporation is committed to respecting human rights and ensuring that forced labour and child labour is not a part of any product within our supply chain.

These include:

- CaraCo Development workforce
- Suppliers of construction materials
- Subtrade labour force

Actions Taken

- Sign off of our Illegal Labour Policy by CaraCo Development Corporation employees
- Attestation by our sub-trade suppliers working on our homebuilding projects that they do not have any forced labour or child labour in their workforce.

Assessment

Our risk assessment has identified that our sub-trade labour force presents the highest risk exposure to CaraCo Development Corporation.

In 2024 we had employees sign off and attest to the Illegal Labour Policy to create awareness with all employees to report any concerns.

In 2024, we implemented an attestation statement with respect to illegal labour with our sub-trade labour

suppliers in our residential construction division.

In 2025 we will add a statement in our contracts with commercial construction sub trades that attests they have no illegal labour practices in their business.

Remediation and Loss Mitigation

- If a supplier, vendor or contractor is found to be in violation of our illegal labour policy, CaraCo Development Corporation will take immediate action to address the violation. This may include termination of the business contract with the organization that committed the violation.
- In addition, CaraCo Development Corporation will act to protect victims by directing them to an appropriate support party at their organization or a third-party remediation service such as the police.

Training

- Distribution of our Illegal Labour Policy to all CaraCo Group of Companies employees.

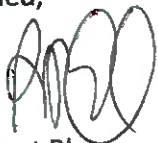
Assessing our Effectiveness

- We will measure employee sign off of our Illegal Labour Policy.
- We will measure attestation sign off from our sub-trade vendors.

Sign off

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31, 2024. It has been issued on behalf of CaraCo Development Corporation and approved by CaraCo Development board of directors.

Signed,



Robert Blommestyn
President, CaraCo Development Corporation