

# Bill S-122 Report

2024.05.31

# Table of Contents

Introduction..... 2

Section A: Structure, Activities, and Supply Chains ..... 2

Section B: Policies and Due Diligence Processes ..... 2

Section C – Forced Labour and Child Labour Risks ..... 3

Section D – Remediation Measures ..... 4

Section E – Remediation of Loss of Income..... 4

Section F – Training ..... 5

Section G – Assessing Effectiveness..... 5

## Introduction

The following report has been prepared by Bosa Enterprise Corporation and Bosa Properties Inc. in alignment with section 11 of Bill S-211 for the financial year ending December 31st, 2023. The entities covered by this report are Bosa Enterprise Corporation (“**BEC**”) and Bosa Properties Inc. (“**BPI**”) (Business Number(s): BEC - 863368130; BPI - 134251933).

BEC and BPI fulfill the criteria as reporting entities as stipulated in Bill S-211 by maintaining a presence, conducting business, and possessing assets within Canada. Additionally, both entities satisfy two of the three size-related thresholds concerning revenue, assets, and employees, and also meet the criteria related to importing goods.

Aligned with Bill S-211, this report is compiled to outline the measures undertaken by BEC and BPI to address the risks associated with forced and child labour within their operational framework, reflecting their steadfast commitment to honesty and integrity in all business operations.

## Section A: Structure, Activities, and Supply Chains

BPI is a real estate development company known for residential and commercial spaces across Canada and the United States. BPI’s portfolio includes a range of developments, from high-rise condominiums to mixed-use complexes. BEC predominantly sources its suppliers from its subsidiary, BPI, located in Canada, resulting in a geographically concentrated supplier base. The vendors for BPI are also based in Canada.

## Section B: Policies and Due Diligence Processes

In their operational and supply chain strategies, BEC and BPI prioritize ethical standards. Their approach, coupled with a focus on fostering strong vendor relationships, acts to mitigate risks of forced and child labour and other unethical practices.

In the previous fiscal year, neither BEC nor BPI had a formal due diligence policy specifically targeting the management and mitigation of forced or child labour risks within their operations and supply chain. Despite this, both entities have opted to collaborate with reputable vendors, inherently reducing exposure to unethical labour practices.

Given their strong commitment to ethical business conduct, both BEC and BPI intend to enhance scrutiny. This is evident through their performance of the risk assessment process specified and detailed in Section C of this report. These efforts, along with other initiatives detailed in this report, highlight the company's dedication to upholding high standards of ethical labour practices and promoting a sustainable, responsible supply chain.

## Section C – Forced Labour and Child Labour Risks

In the previous fiscal year, neither BEC nor BPI initiated the process of identifying risks. However, to ascertain potential areas of forced or child labour risks within their supply chains, both entities recently conducted a risk assessment. This assessment drew insights from sources such as the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour. These documents were relied upon for their relevance to Canadian entities regarding forced or child labour risks. Through this process, BEC and BPI were able to identify potential risks associated with certain countries in their supply chains.

It is important to note that this risk identification exercise does not presume the actual occurrence of forced or child labour within operations or supply chains. Rather, its aim is to recognize potential scenarios where such risks could emerge, facilitating the implementation of preventative measures. The assessment acknowledges that no industry is entirely immune to the risks of forced and child labour, particularly in sectors where regulatory frameworks and enforcement mechanisms may be less robust.

The analysis delved into specific geographic regions flagged as presenting heightened risks of forced and child labour practices, based on credible sources like the Walk Free Global Slavery Index. Furthermore, it encompassed an examination of at-risk categories of goods, allowing for a targeted approach to the risk assessment process.

### Risk Assessment Findings

Through the analysis, BEC and BPI have identified that their suppliers are all local (i.e., in Canada) presenting a low risk of forced or child labour, according to the Walk Free Global Slavery Index.

Moreover, BPI and BEC factored in data from the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour. This step is crucial in pinpointing specific goods within the import portfolio that might be vulnerable to forced or child labour. Upon evaluating this data against the imported products, no product group was flagged as having a higher risk of being associated with forced or child labour practices.

Overall, the risk assessment findings suggest that BEC's and BPI's exposure to forced and child labour risks within the supply chain is limited. However, this does not diminish the commitment to acknowledging risks and implementing corresponding risk management procedures and policies. Regarding the identified risks above, BEC and BPI intend to explore avenues for directing additional resources and efforts towards mitigating and managing forced and child labour risks.

## Section D – Remediation Measures

In the previous fiscal year, neither BPI nor BEC identified any occurrences of forced or child labour within their operations or supply chains, and consequently, no remedial actions were initiated.

In accordance with the United Nations Guiding Principles on Business and Human Rights, BEC and BPI acknowledge the necessity of robust remediation protocols. Although no instances of forced or child labour were detected within their operations or supply chains, prompt measures will be taken if such incidents arise in the future. Understanding the complexity of supply chains, BEC and BPI are dedicated to working closely with suppliers to ensure the implementation of remediation measures.

## Section E – Remediation of Loss of Income

In the previous fiscal year, BEC and BPI have not identified any instances of forced or child labour in our operations or supply chains, and by way of a supply chain risk assessment has determined itself to carry a low overall supply chain risk as it relates to forced or child labour. Thus, no measures have been taken to remediate the loss of income to vulnerable families.

Recognizing the importance of being prepared to take immediate and effective action should any such issues arise, BEC and BPI are committed to rectifying any potential situations that may arise.

## Section F – Training

During the preceding fiscal year, BEC and BPI did not administer any mandatory or optional training to employees regarding the company's code of conduct, particularly regarding forced and child labour in the supply chain.

Going forward, we remain dedicated to maintaining ethical standards. Both BEC and BPI strive to develop a supply chain and a team of professionals who are collectively vigilant and committed to combating forced and child labour.

## Section G – Assessing Effectiveness

In the previous fiscal year, BEC and BPI did not have specific policies and procedures to evaluate their effectiveness in preventing the use of forced labour and child labour in its operations and supply chains. However, they are committed to enhancing measures should concerns arise or best practices evolve.

## Attestation

In accordance with the requirements of Bill S-211, 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 Bill S-211, for the reporting year listed above.

Full Name: Colin Bosa  
Title: Secretary  
Date: March 31, 2024

Signature:  \_\_\_\_\_

Full Name: Dale Bosa  
Title: Authorized Signatory  
Date: March 31, 2024

Signature:  \_\_\_\_\_

\* We have the authority to bind Bosa Enterprise Corporation.

Full Name: Colin Bosa  
Title: President  
Date: March 31, 2024

Signature:  \_\_\_\_\_

Full Name: Dale Bosa  
Title: Secretary  
Date: March 31, 2024

Signature:  \_\_\_\_\_

\* We have the authority to bind Bosa Properties Inc.