



Bill S-211 Report

2025-05-31

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Introduction

The following report has been drafted by Axiom Builders in alignment with section 11 of Bill S-211 for the financial year ending December 31, 2024. The entity covered by this report is Axiom Builders Inc. (Business Number: 893119156).

Axiom Builders meets the definition of a reporting entity under the act by having a place of business in Canada and doing business in Canada. In addition, Axiom Builders meets two out of the three size-related thresholds for revenue, assets, and employees, and meets the criteria related to importing goods.

Axiom Builders is steadfast in its commitment to upholding honesty and integrity in all its business operations. In alignment with Bill S-211, this report has been prepared to disclose the measures that Axiom Builders has implemented to mitigate the risks associated with forced and child labour within its business framework.

Section A: Structure, Activities, and Supply Chains

Axiom Builders is a trusted construction partner for many well-known developers and is active in residential and commercial construction. With over 12 million square feet under construction in Canada and the U.S., Axiom Builders has become one of the leading builders in the industry.

Axiom Builders' supply chain predominantly relies on Canadian sources.

Section B: Policies and Due Diligence Processes

At Axiom Builders, we prioritize ethical practices throughout our operations and supply chain. Our dedication to this principle, coupled with our approach to cultivating robust vendor relationships, serves as a safeguard against potential threats such as forced or child labour, as well as other unethical behaviours within our operational and supply networks.

Over the previous fiscal year, Axiom Builders did not have a formal due diligence policy specifically aimed at managing and mitigating the risks of forced or child labour within its operations and supply chain. However, the company is intentional in partnering with top-tier vendors, a choice that inherently reduces the likelihood of encountering unethical labour practices.

Looking forward, Axiom Builders is dedicated to further enhancing its due diligence efforts to actively mitigate the risk of forced and child labour in its supply chain. This is demonstrated by recent due diligence endeavours, during which we conducted a thorough risk assessment process outlined in detail in Section C below. These endeavours, alongside other initiatives outlined in this report, underscore the company's current stance and commitment to maintaining high standards of ethical labour practices, while fostering a sustainable and responsible supply chain.

Section C: Forced Labour and Child Labour Risks

During the previous fiscal year, Axiom Builders started the process of identifying forced and child labour risks by carrying out a risk assessment process.

This process was guided by insights provided by 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. Axiom Builders has relied on these documents for the risk identification process; they are considered a credible source of information for Canadian entities as it relates to the risk of forced or child labour. In conducting the supply chain forced and child labour risk analysis, Axiom Builders was able to highlight potential risks of forced or child labour associated with certain countries.

In conducting this risk identification exercise, it is imperative to clarify that it does not presuppose the presence of forced or child labour within our operations or supply chains. Rather, its purpose is to identify potential circumstances where such risks could arise. This approach is designed to empower our organization to implement proactive and effective preventative measures. Our assessment acknowledges the ubiquitous nature of the risks associated with forced and child labour across industries. Furthermore, it recognizes the inherent vulnerabilities within certain sectors of our supply chain, particularly in regions where regulatory oversight and enforcement mechanisms may be less stringent.

The analysis considered specific geographic regions that, according to the Walk Free Global Slavery Index, present a higher risk of forced and child labour practices. This geographic risk assessment was combined with an assessment of at-risk-goods categories, further enabling a targeted lens to our risk assessment.

Risk Assessment Findings

Through comprehensive analysis, Axiom Builders has identified suppliers in two countries, Canada and Singapore, as posing a low risk of forced or child labour. This is according to the Walk Free Global Slavery Index, with the majority of the total expenditure sourced from Canada and less than 1% from Singapore.

Furthermore, Axiom Builders reviewed data from the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour. This critical step involved isolating specific goods from our import portfolio that might be vulnerable to forced or child labour. Upon cross-referencing this data with our imported products, no items were found to be at an elevated risk of association with forced or child labour practices.

Overall, the results from our risk assessment indicate that our exposure to forced and child labour risks within the supply chain is low, based on consideration of jurisdictional risk and product risks. However, this does not diminish our commitment to assessing risks and aligning our risk management procedures and policies accordingly.

Axiom Builders will further explore how to allocate additional resources and engagement to support the mitigation and management of forced and child labour risks.

Section D: Remediation Measures

Over the previous fiscal year, we have not encountered any instances of forced or child labour within our operations or supply chains, and consequently, no remedial actions have been necessary.

While no occurrences of forced or child labour within our operations or supply chains have been identified, should any arise in the future, we will take action. Acknowledging the intricate nature of supply chains, we are committed to collaborating closely with our suppliers to ensure the effective implementation of remediation measures.

Section E: Remediation of Loss of Income

Over the previous fiscal year, Axiom Builders has 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.

Section F: Training

During the previous fiscal year, Axiom Builders did not conduct mandatory in-house training specifically focused on the prevention of forced and child labour within the supply chain. However, we remain fully committed to upholding ethical standards and fostering a culture of vigilance. Should circumstances warrant, our in-house supply chain professionals are prepared to engage proactively, and we are positioned to consult with external industry experts to ensure appropriate action and alignment with evolving best practices.

Section G: Assessing Effectiveness

In light of Axiom Builders' internal risk assessment and the nature of our supply chain, which is primarily composed of on-shore sources, the organization has not, during the previous fiscal year, established specific policies or procedures to assess the effectiveness of measures aimed at preventing the use of forced labour or child labour within our operations and supply chains. Notwithstanding, Axiom Builders remains committed to implementing enhanced due diligence processes as warranted by emerging concerns, regulatory developments, or evolving industry best practices.

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.

X Jordan Thomas

Full Name

X Executive Vice President

Title

X 2025-05-31

Date

X

Signature*

* I have the authority to bind Axiom Builders Inc.