



## Introduction

This Report is published pursuant to the Canadian “Fighting Against Forced Labour and Child Labour in Supply Chains Act” (the “Act”) and sets out the steps that NF Bosa Holdings Inc. and its subsidiaries (the “Companies” or “Bosa Development”), have taken and are continuing to take to combat forced and child labour in the business and supply chains. The Report is a joint report and covers activities for the financial year ending December 31, 2023.

## Steps to Reduce Forced Labour

Bosa Development recognizes its responsibility to combat global forced and child labour, and is dedicated to acting ethically, with integrity and transparency. It is in the process of implementing controls to safeguard against forms of forced and child labour within its operations and supply chain. Bosa Development does not engage with business that it knows to be involved with forced and child labour.

In general terms, to reduce the risk of forced and child labour within its operations Bosa Development reviewed its Anti-Harassment and Bullying policy, distributed it to all employees and provided training on its applications. In addition, all new employees were provided training on this policy, the Code of Conduct, Core Values, Open-Door policy, and how to report workplace incidents and concerns. Employees can raise workplace concerns by speaking with a manager at any level, per the Open-Door policy, or through an online form. Employees are not required to include their names when using this form to raise concerns. Bosa Development’s recruitment and hiring processes are designed to ensure that all prospective employees are legally entitled to work in the location of the position they are applying to.

## The Business

Headquartered in Vancouver, BC, Bosa Development’s business includes the design and construction of residential buildings and management of commercial properties; primarily operating in Vancouver BC, with operations in Alberta, Washington, California, and Hawaii. The buildings that Bosa Development creates are modern-city apartments that aim to elevate the livability of each city it operates in. Bosa Developments has a diverse



commercial portfolio and is constantly seeking new opportunities to expand. The properties it manages include hotels, shopping centres, storefront retail, apartment rentals, warehouses, office buildings and film studios.

Bosa Development is the parent company for several subsidiaries and has determined that the following companies meet the reporting requirements set out in section 2 of the Act.

- BDC (Empress Hotel) Investment Corporation
- Bosa Development (Dockside Phase 1 Tower 1) GP Ltd
- Bosa Development (Dockside Phase 1 Tower 1) LP
- Bosa Development (Dockside) Ltd.
- Bosa Development Group Inc.
- J.J.R Developments Ltd.
- NF (Dockside Phase 1) LP Ltd.
- Bosa Development (320 Granville) Ltd.
- Bosa Development (Dockside Phase 1 Tower 2) GP Ltd
- Bosa Development (Dockside Phase 1 Tower 2) LP
- Bosa Investment (2003) Inc.
- M6 Realty Group Inc.
- NF Bosa Holdings Inc.

## Supply Chain

Materials used in the construction of Bosa Development's buildings are procured via its contractors and their subcontractors. Building finishes are procured through various vendors. All its contractors and vendors operate within North America, however, the materials they source come from around the world. This may include countries where there is an increased risk of forced and child labour.

Those involved with the construction of Bosa Development's buildings are mostly employed by its contractors, however, its employees are involved with site supervision and project management. It has direct contact with its trade contractors, who supply their own labour to work on Bosa Development's construction sites. The trade contractors may employ their own subcontractors to complete specific jobs, in this case, Bosa Development's contact is only with the trade contractor.

In addition to office employees, Bosa Development uses consultants in the development of its buildings. These include, but are not limited to, interior designers, engineers, architects, and lawyers. They are hired on a contract basis to perform services that are beyond the scope of its employees' duties.

## Policies and Due Diligence Processes

Human rights are embedded in Bosa Development's policies, governance, and business conduct; it expects its employees to act with integrity and transparency. It expects the same from its contractors and vendors. As it has established long-term, close-knit relationships with these parties, Bosa Development can easily monitor these expectations.

Bosa Development's commitment to promoting safe working conditions and ethical labour practices are reflected in its company policies, codes, and core values.

### Core Values

Bosa Development's goal is to be the most trusted and reputable builder, landlord, and employer. Its core values are trust, respect, integrity, and humility. These values are the foundation of its culture and are prevalent in the way it conducts business. Employees are expected to trust and respect all stakeholder, speak up when a problem is identified, and resolve issues using ethics and morals.

### Code of Conduct

The code of conduct applies to all employees whenever they are on Bosa Development property and/or conducting business on behalf of the company. It addresses ethical conduct in the workplace and outlines examples of misconduct. Engaging in any conduct that Bosa Development deems inappropriate may result in corrective action, up to and including termination.

### Anti-Harassment and Bullying Policy

Bosa Development is committed to the prevention of bullying and harassment in the workplace, and strives to provide a safe, respectful work environment for staff, vendors, and clients. It recognizes that unsafe workplaces may be linked to an increased likelihood of forced labour occurring, including in its supply chain. Anti-Harassment and Bullying policies are reviewed and distributed annually. This policy applies to all Bosa Development employees and consultants. Every employee is required to complete the Anti-Harassment and Workplace bullying training within 3 months of employment.

### Open Door Policy

Bosa Development actively encourages open communication between all levels of its employees. The purpose of this policy is to encourage feedback and discussion about



important matters and encourage employees to raise workplace concerns. It includes the assurance that an individual has the right to talk to any level of management and will experience no retaliation or interference from an immediate manager.

## Forced Labour and Child Labour Risks

Bosa Development has identified two areas in which there is a risk of forced and child labour within its operations, amongst personnel and within its supply chain.

### Among Personnel

Bosa Development believes the risk of forced and child labour amongst its personnel is low. Most of its employees and contractors reside within Canada and the US and are therefore subject to Canadian and US labour laws. However, a small portion of its accounts payable functions are outsourced to an Indian company, Outsourcing Hub India (OHI). While it has no knowledge of their involvement with forced and child labour, Bosa Development is not privy to the treatment of their staff and working conditions. In addition, OHI operates in a high-risk region, Bosa Development acknowledges that this relationship increases the risk of forced and child labour within its operations.

### Within the Supply Chain

Globally, construction sectors are considered to be high-risk sectors for forced and child labour due to high levels of subcontracting and complex building material supply chains. Bosa Development is often several steps removed from the procurement of materials used in the construction of its buildings. It recognizes that trade contractors and their subcontractors may procure materials from outside North America, increasing the risk of forced and child labour within its operations.

In relation to the supply of materials used in building finishes, Bosa Development does not procure any materials directly from manufacturers. All its vendors operate within North America; however, it recognizes that they may procure materials from outside North America, increasing the risk of forced and child labour within Bosa Development's operations.



The following are some high-risk areas that materials may originate from, however, Bosa Development believes that most materials are sourced from North America and Europe.

- Afghanistan
- Bangladesh
- Brazil
- Cambodia
- China
- India
- Nepal
- North Korea
- Pakistan
- Vietnam

## Remediation Measures

During the 2023 fiscal year, Bosa Development did not identify any incidents of forced or child labour within its operations or supply chain, and therefore did not need to take any remediation measures. Should it discover any incidents of forced or child labour within its operations or supply chains, it will consider the appropriate remediation measures in compliance with governing standards.

## Training

Bosa Development employees receive training on ethical topics and company policies on an annual and semi-annual basis. All new employees must complete anti-harassment and bullying training within 3 months of commencing employment. Included in the onboarding process is training on Bosa Development's Code of Conduct, Open-Door policy, and Core Values. Employees are also trained on how to raise concerns, report workplace incidents and, on the process to investigate any reported incidents.

In 2024, Bosa Development intends to include the topic of forced and child labour in its annual, semi-annual and onboarding training.

## Assessing Effectiveness

During the 2023 fiscal year, Bosa Development had not yet taken any measures to assess the effectiveness of its efforts to reduce forced and child labour within its operations and supply chain. It intends to do so once controls to safeguard against forms of forced and child labour are implemented and established within its operations.



## Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of NF Bosa Holdings Inc.

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.

I have the authority to bind NF Bosa Holdings Inc.

Clark Lee  
Chief Financial Officer, NF Bosa Holdings Inc.  
May 31, 2024