

Jayman Built Group of Companies Statement on Fighting Against Forced Labour and Child Labour in Supply Chains Act or Bill S-211

Bill S-211, *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*, the “Act”, requires the Jayman Group of Companies to prepare an annual Fighting Against Forced Labour and Child Labour in Supply Chains Report and publish it on our website. This is our first annual public disclosure, it addresses the period from January 1, 2023, to December 31, 2023, and we will continue to publish our activities through this channel.

The Act requires entities to determine whether they are affected within the definition of the Act. We have determined that the following entities are affected and are listed below, further described as “Jayman Built”:

- Jayman Legacy Holdings Inc.,
- Jayman Built Ltd.,
- Jayman Built,
- Jay Westman Holdings Ltd.,
- JWI Investments, LP,
- Jay Westman Portfolio Inc.,
- Jayman Built Multifamily Ltd.

The Report must include the following:

- Its structure, activities, and supply chains.
- Its policies and due diligence processes in relation to forced labour and child labour.
- The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.
- Any measures taken to remediate any forced labour or child labour.
- Any measures taken to remediate the loss of income to the most vulnerable families because of child labour or forced labour.
- Any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.
- The training provided to employees on forced labour and child labour.
- How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

Organizational Structure, Business Activities and Supply Chain

Jayman Built is a residential and commercial developer operating across the Edmonton and Calgary metropolitan areas and has been in operation for over 43 years. We are headquartered in Calgary Alberta and employ over 220 people directly. Jayman Built was built on a platform of honesty, integrity, and family values. Our vision statement is:

“Jayman Built will be a legendary company that has sustainable competitive advantages in residential homebuilding.”

At Jayman Built, our main operations include:

- The development of Master Planned communities.
- Single family and Multi Family residential construction.
- Owning and operating:
 - Residential rentals,
 - Seniors' facility,
 - Retail and Commercial units,
 - Various other real estate investments.

Jayman Built acts as a principal contractor, its supply chain consists of:

- Consultants and designers,
- Material suppliers from whom materials are purchased either directly or through subcontractors,
- Subcontractors who carry supply and installation contracts for various projects,
- Labour agencies that provide temporary staff,
- Various overhead components including personnel and overhead supplies,
- Software purchased from third parties.

Policies and Due Diligence Processes

At Jayman Built through our existing organizational and governance procedures, we convey our corporate expectations and values. We are committed to being a good corporate citizen setting a high standard for ourselves and all our business partners and trade suppliers. At this time, we are assessing the requirements of the Act through our supply chain and potential impact to our current policies and procedures. We endeavour to monitor the performance of our suppliers to ensure our activities do not have a negative impact on human rights and establish appropriate policies as they relate to the Act. Our relevant policies are discussed in detail below:

Code of conduct

Our Code of Conduct is a foundational pillar at Jayman Built and sets out principles for professional conduct and lawful and ethical behavior in performing job duties. Jayman Built employees must refrain from doing anything that would be considered improper conduct, which includes illegal, fraudulent, dishonest, unethical, or negligent behaviour.

Supplier Code of Conduct

At Jayman Built, we engage with suppliers that are committed to the same principles as we are, and suppliers commit to these standards as a condition of doing business with us. We review our supplier contracts (our Subcontractor Agreement) annually to ensure that our contract is in line with best practices and applicable legislation. Our Subcontractor Agreement details requirements and expectations that we have of our suppliers specifically around compliance with the:

- Alberta Occupational Health and Safety Code,
- Jayman BUILT Safety Protocol,

- Alberta Employment Standards.

Due Diligence

We acknowledge that there is a potential risk of child labour and forced labour within our supply chain. Currently, we are assessing the requirements of the Act and potential impact to our policies and procedures. Our existing policies require that we evaluate our suppliers and third parties to adhere to business principles and values similar to our own. In addition, we require them to comply with all applicable laws and regulations. We are committed to working with our suppliers to ensure they have a clear understanding and appreciation of the Act and make an effort to combat forced and child labour.

Assessing the Risk of Forced and Child Labour

Jayman Built has conducted a preliminary review of its business and supply chain and found that our exposure to the risk of forced and child labour increases when we engage with third parties. Jayman Built has identified that the following activities may carry some risk of forced and child labour:

- Offshore sourcing of materials and products, either directly by Jayman Built or indirectly through its subcontractors and subtrades,
- Use of subtrades, subcontractors, and temporary labour on Jayman Built construction sites.

Remediation Measures and Remediation Loss of Income

At Jayman Built, we are in the preliminary stages of conducting assessments of our activities and supply chain as well as developing a remediation plan in relation to the Act. We understand the importance of a strong remediation plan and taking the required steps to assist any parties affected by either child or forced labour within our supply chains and business operations. As of December 31, 2023, we have not been made aware of any incidents of forced labour or child labour being used within our operations or by our suppliers. Therefore, we have not yet needed to take any measures to remediate an incident of forced labour or child labour.

Employee Training

At Jayman Built, we pride ourselves in providing extensive training for both our employees and business partners. Given that we are still in the process of determining requirements, as of December 31, 2023, we have not included training related to child or forced labour into our current programs. As we progress, Jayman Built will be committed to incorporating such training to ensure that we are following best practices as they relate to the Act.

Assess Effectiveness

As discussed previously, Jayman Built currently uses its Code of Conduct, Supplier Code of Conduct, and vendor due diligence processes to manage exposure to the risk of forced and child labour. Jayman Built is reviewing its existing processes and procedures as they relate to forced and child labour, and assessing their effectiveness in ensuring that forced and child labour are not being

used in its business and supply chains. To date, no significant concerns or complaints have been identified.

Approval and 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 this Report for the Company. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Jay Westman

A handwritten signature in black ink, appearing to read 'Jay Westman', with a stylized flourish at the end.

President and Chairman of the Board