



2023 Report on Fighting Modern Slavery

May 31, 2024

1. INTRODUCTION

ABOUT THIS REPORT

Blinds To Go Inc. (referred to as “BTG, the “Company”, “we”, “us” or “our”) has prepared this report in accordance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) and the related guidance from Public Safety Canada, for its financial year ending on February 3, 2024.

BTG recognizes the importance of fighting against forced labour and child labour. Forced labour is generally defined under international law as work or service which a person must do under the menace of penalty, in any form, for which said person did not agree to perform the work or service voluntarily.¹ Under the Act, it also includes labour or service provided or offered to be provided by a person under circumstances that could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service.²

Child labour comprises, amongst other, labour or services provided or offered to be provided by persons under the age of 18 years and that are provided (i) under circumstances that are mentally, physically, socially or morally dangerous to them, (ii) under circumstances that are contrary to the laws applicable in Canada, (iii) interfere with their schooling, or (iv) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention.³

For the purposes of this report, forced labour and child labour will collectively be referred to as “Modern Slavery”.

This report describes the steps taken by BTG to assess, prevent and reduce the risk of Modern Slavery in its operations and supply chains.

¹ Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

² Section 2 of the Act.

³ Article 3 of the Convention defines the worst of child labour as comprising, inter alia, (i) all forms of slavery, including sale and trafficking of children, and forced and compulsory labour of children, (ii) the use, procuring or offering of a child for prostitution or pornography, (iii) the use, procuring or offering of a child for illicit activities, and (iv) work which is likely to harm the health or safety or morals of children (see Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999).

2. STEPS TAKEN TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR

As all of BTG's manufacturing operations are based in North America, mostly in Canada and the United States, the risk of Modern Slavery in its own operations is very low. As is explained in this report, BTG is committed to ensuring that its operations respect labour laws and standards and that there is no Modern Slavery in its operations. BTG is committed to engaging with business partners who within our supply chains share our dedication to integrity and workplace respect. We uphold all human rights, in accordance with applicable laws and international standards such as the Voluntary Principles on Security and Human Rights, core conventions of the International Labour Organization, and the United Nations' declarations and principles on human rights.

This Report also details BTG's current processes and highlights the actions planned for the near term: over the next period, BTG's objective is to strengthen its policies on business conduct and supplier due diligence, with the ultimate goal of better addressing the risk of Modern Slavery. In preparation of this Report, we have conducted an internal assessment of the risks of Modern Slavery within our organization's activities and supply chains, we have consulted with experts on the issue of addressing Modern Slavery, and we have developed a roadmap outlining the planned initiatives to address Modern Slavery in the upcoming year.

3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Company overview

BTG (doing business as Le Marché du Store in Québec) is a vertically integrated manufacturer and retailer of window blinds, shades, shutters and drapes. Over the course of the last 70 years, BTG has grown to become North America's leading manufacturer-retailer with over 90 showrooms and operations in Quebec and Ontario, as well as in the United States through its wholly-owned subsidiary, Blinds To Go (U.S.) Inc. (BTG US).⁴

Although we are a manufacturer in addition to being a retailer, we have made the strategic decision of only manufacturing for our own retail locations. Therefore, BTG is not involved in wholesaling or otherwise selling to other stores, and focuses on delivering its products to the end-users, primarily individuals and households.

⁴ Blinds To Go (U.S.) Inc. does not meet the definition of an "entity" under Section 2(1) of the Act.

BTG's business model is primarily built on the concept of custom-made blinds, shades, shutters and drapes marketed at factory-low prices and ready at the point-of-sale store for customer pick-up or delivery from our installation service providers within a short delivery timeframe.

Blinds To Go Operations in Canada

Our Canadian operations are organized into three main functional areas: Corporate, Retail and Manufacturing Plant. Across all of these three functional areas, we employ more than 600 employees in Canada.

a) Corporate

BTG's head office and support centre is located in Montreal, Quebec, and is comprising certain of our core functions, including but not limited to Finance, Human Resources, Legal, Information Technology, Customer Service and Real Estate.

b) Retail.

The Canadian retail locations are located in Ontario, where the stores are operated under the "Blinds To Go" banner, and in Quebec, where the stores are operated under the "Le Marché du Store" banner. There are also shop-at-home representatives in Canada. In addition, we have an e-commerce platform (see www.blindstogo.com) where customers can purchase our products online.

c) Manufacturing.Plant

The manufacturing process is labor intensive, given the specifics of each custom order. Our Canadian manufacturing plant is located in Montreal and is responsible for receiving and fulfilling customers' orders for certain types of window coverings. Once complete, the orders are shipped directly to our showrooms/distribution centres for ultimate delivery to the customers.

Blinds To Go Products and Services

BTG offers several custom-made products to its clients, including the following:

- Horizontal blinds
 - Natural woods;
 - Faux woods;
 - Mini vinyl; and
 - Mini aluminum.
- Shades
 - Cellular;
 - Pleated;
 - Woven wood;

- Roller;
- Serenity; and
- Roman.
- Vertical blinds and shades
 - Vertical vinyl blinds;
 - Vertical fabric blinds; and
 - Panel track shades.
- Shutters
- Drapes

BTG also offers measuring services to its customers and installation services through third-party service suppliers.

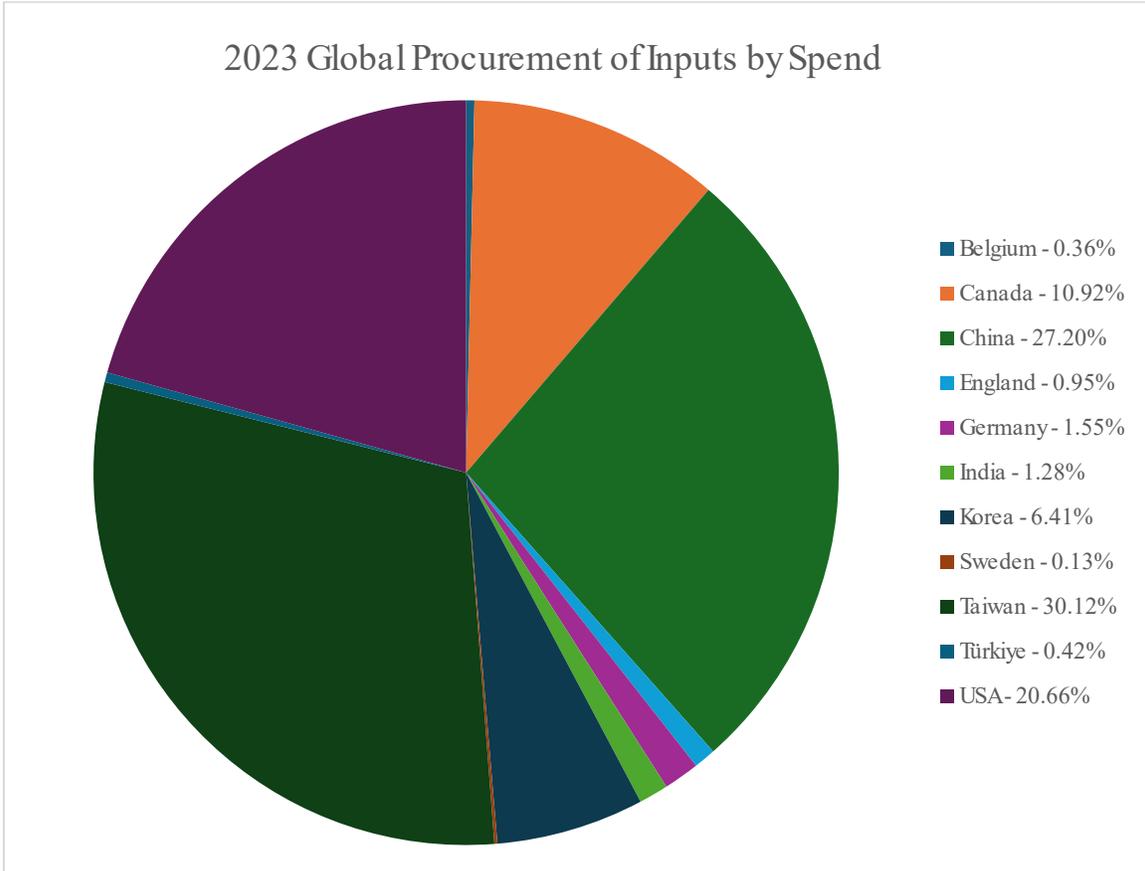
Blinds To Go Supply Chains

BTG purchases intermediary goods and raw material used as inputs from about 70 third-party suppliers located primarily in Canada, the United States, as well as Asia and Europe. These inputs are used strictly for the production of its blinds, shades, shutters and drapes.

The types of goods constituting the majority of goods procured are set out below.

| Segment | Type of Goods Procured | Description |
|---------------|------------------------|--|
| Retail | Product for sale | Produced by one of the manufacturing plants. |
| | Office Supplies | Furniture, computers and equipment, software, etc. purchased from third-party suppliers. |
| Manufacturing | Inputs (Raw Materials) | Slats Fabric Head Rails Other Components |
| | Office Supplies | Furniture, computers and equipment, software, etc. purchased from third-party suppliers. |
| | Other | Machinery and equipment, personal protective equipment (PPE), packaging materials, office and retail equipment, etc. |
| Corporate | Office Supplies | Furniture, computers and equipment, software, etc. purchased from third-party suppliers. |

Below is a breakdown of the proportion of BTG’s inputs purchased in Canada and abroad by country of supplier:

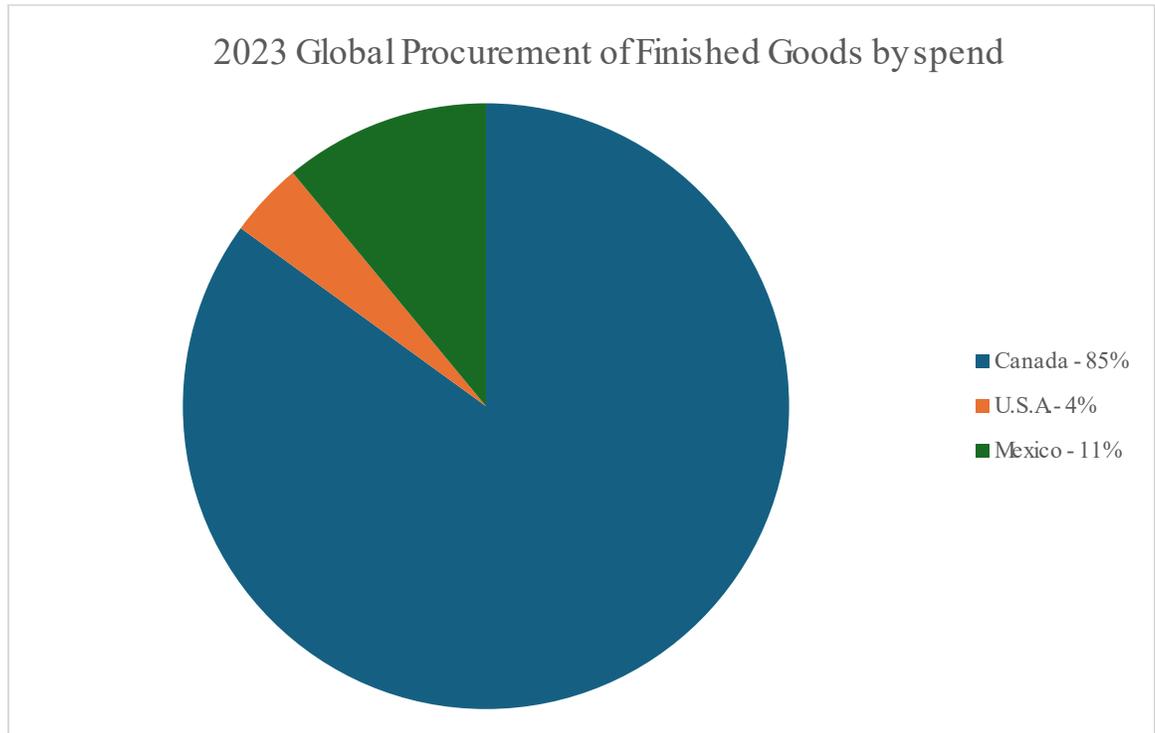


After receiving the inputs, BTG manufactures all of its window coverings in one of the four plants listed below:

- The manufacturing facility located in Montreal, Quebec, and operated by BTG;
- The two manufacturing facilities operated by BTG US, located in Lakewood, New Jersey and in Hannover, Maryland;
- A manufacturing facility located in Saltillo, Mexico owned and operated by a third-party service provider, which manufactures all overflow products for BTG’s Canadian and US customers.

Therefore, all of BTG final products are manufactured in North America with the vast majority of our products being manufactured domestically.

Below is a breakdown of the proportion of BTG’s final products by country of production:



4. POLICIES AND DUE DILIGENCE PROCESSES

BTG’s operations and activities are driven by its strong values which are shared among all of its employees.

While BTG did not have formal policies specifically aimed at addressing Modern Slavery risk in its supply chains over the reporting period covered by this report, the Company initiated a review in the current financial year of said policies, procedures and programs to specifically address corporate Modern Slavery risks and legislative requirements within its operations.

Our Corporate Values and Policies

The core values of BTG are the following, as indicated in our employee handbook:

- Will and drive to be the best
- Integrity
- Committed to our vision
- Customer focused
- Entrepreneurial
- Results-driven

- Team Player
- Developing and promoting internally

Each BTG employee is expected to share and champion these core values, which promotes engagement. They are also expected to respect the various policies put in place by our human resources department.

BTG is also committed to helping its community and the environment, which can be shown with its involvement with World Vision and other charities and our programs to donate blinds. It is very important for us to give back. We are also proud to mention that BTG employees participate in a charity event during the BTG Annual Meeting.

Our Processes regarding our Supply Chains

BTG follows strict processes for the onboarding of new suppliers through a checklist. Each member of the supply chain team is trained to ask and fill out a questionnaire for each new vendor. It is BTG's intention to create a new Supplier's Code of Conduct in 2024 to strengthen such processes and to add questions related to fighting Modern Slavery in its onboarding questionnaire in order to help assess and prevent risks of Modern Slavery in our supply chains.

5. FORCED LABOUR AND CHILD LABOUR RISKS ASSESMENT

While BTG did not have a formal risk assessment process in place during the reporting period covered by this report to appropriately identify Modern Slavery risks within its operations or supply, in the context of preparing this report, BTG has conducted an internal risk assessment of its supply chains and will be working on standardizing the assessment process in the near term.

6. BUSINESS AND SUPPLY CHAINS COMPONENTS THAT MAY CARRY RISKS OF FORCED LABOUR AND CHILD LABOUR

Our Operations

BTG operates offices and stores in Canada and BTG US operates offices and stores in the United States, two countries where the risks of Modern Slavery are very low. Our human resources department makes sure that we respect local applicable labour and employment standards and legislation, such as the Employment Standards Act, the Act Respecting Labour Standards, the Charter of Human Rights and Freedoms, the Act Respecting Industrial Accidents and Occupational Diseases, the Act Respecting Occupational Health and Safety, Quebec's Labour Code and the Civil Code of Quebec. These legislations have established minimum standards which aim at reducing and eliminating risks of Modern Slavery.

As explained above, our products are manufactured in four plants in North America: one in Canada, two in the United States and one in Mexico, over which BTG has direct or indirect (for the Mexico plant) control. Therefore, we assess the risk of child labour in these plants as also very low. Each facility follows strict labour law legislations and standards, and no minors are allowed to work in any of the manufacturing plants (please note that for the Mexican plant, we ensure that these points are respected through the agreement between BTG and the third party managing such plant).

In addition, the following employment practices that are put in place in all of our business operations, including the manufacturing facilities, also ensure that our workforce does not face exploitative treatment:

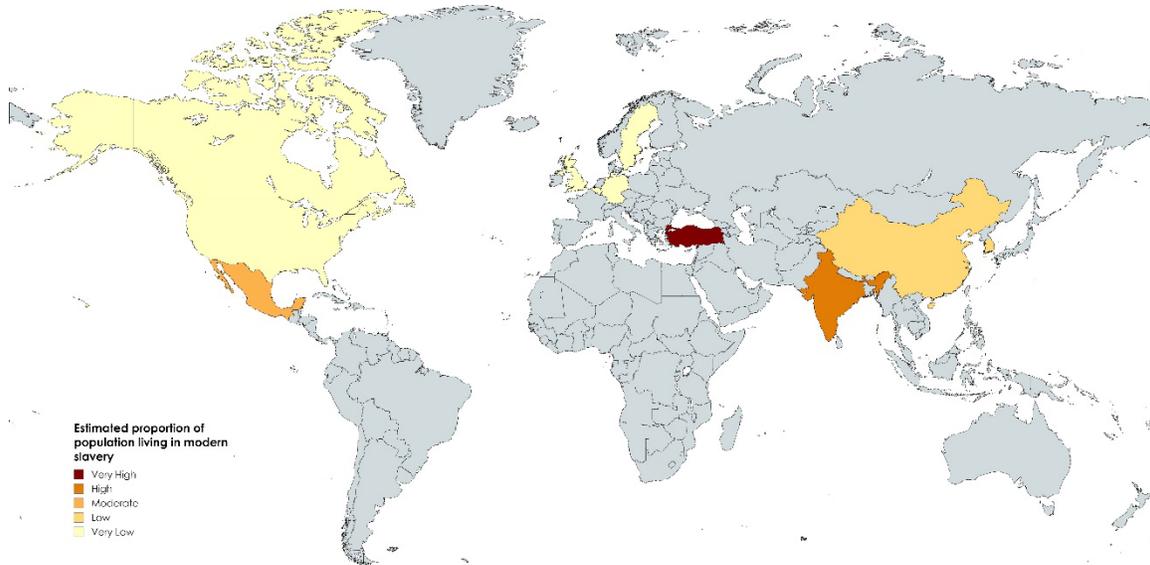
- Entry level salary is above legislative minimum wage;
- Working hours are within legislative framework;
- Robust recruitment and development processes; and
- Minimum age to work is 18 years old.

Our Third-Party Suppliers

The majority of the goods we purchase are identified as low risk based on a review of information provided by global providers of risk data and publicly available information.

We understand that certain manufacturing regions and materials carry higher risk of Modern Slavery by virtue of the prevalence of risks in similar activities in particular countries. There are also risks linked to certain industries.

The map below displays out risky areas from which BTG purchase goods for its operations. The countries are ranked according to the estimated proportion of population living in modern slavery in each country.⁵



Giving the foregoing information, we assess the overall risk of Modern Slavery in our supply chain as being low.

BTG has acknowledged the elevated risk associated with its direct suppliers located in countries such as Türkiye and India, where there is a higher likelihood of forced and child labour in existing supply chains. When looking at the 10 countries with the highest prevalence of Modern Slavery (from the Walk Free, Global Slavery Index), we only purchase goods from Türkiye and such purchases account for less than 0.5% of our inputs, which we consider minimal. In addition, only three countries from which we import are found in the report on the List of Goods Produced by Child Labor or Forced Labor prepared by the U.S. Bureau of International Labor Affairs on September 28, 2022.⁶

As of the date of this Report, there has been no identified instances of Modern Slavery in BTG’s supply chains, and we have not been subject to any investigation related to these matters. Over the remainder of the current financial year, the Company intends to prioritize additional due diligence activities with identified high-risk suppliers, to better assess the risks of Modern Slavery practices and determine if remediation actions may be required.

⁵ The estimates are based in the data of the [Walk Free Global Slavery](#) Index specific to forced labour risks.

⁶ See: [2022-TVPRA-List-of-Goods-v3.pdf \(dol.gov\)](#) .

7. REMEDIATION MEASURES OF FORCED LABOUR OR CHILD LABOUR AND LOSS OF INCOME

Based on our risk assessment above and as of the date of this Report, BTG has not identified any instances or allegations of forced or child labour or of loss of income of vulnerable families within its own workforce or supply chain. Therefore, no remediation measure has been determined to be required.

In the event that BTG assesses that it has caused or contributed to forced or child labour or to loss of income, we undertake to cooperate with impacted parties to develop the appropriate remediation approach.

8. TRAINING

While BTG did not have any dedicated training modules on modern slavery during the reporting period covered by this report, we are currently preparing a new training program with a focus on Modern Slavery. Such training will be prepared in-house and will focus on identifying, preventing and reporting risks of Modern Slavery. It will also include the new policies that will be put in place before the end of the year. The training will be mandatory for our supply chain team as well as our human resources team.

By adopting this proactive approach, BTG wants to exemplify its commitment to addressing and mitigating the potential risks associated with Modern Slavery.

9. EFFECTIVENESS ASSESSMENT

As this is BTG's first-ever Modern Slavery Report, it is premature to assess and report on the effectiveness of the anti-modern slavery measures planned for implementation this year. In future reports, BTG intends to establish measurable key performance indicators (KPIs) that can be monitored on an annual basis. This will enable us to evaluate the efficacy of these measures over time and make any necessary adjustments. This commitment to continuous evaluation and improvement underscores BTG's dedication to combating Modern Slavery and continually enhancing its efforts in this important area.

BTG is committed to continuous improvements of all aspect of is operations and to put in place measures to prevent Modern Slavery. As indicated above, over the remainder of the 2024 reporting period, BTG plans to:

- Review its current policies and procedures;

- Develop a new Supplier's Code of Conduct with a focus on preventing Modern Slavery; and
- Develop a new training program.

As we continue to develop our program and implement the procedures and policies listed above to prevent Modern Slavery within our operations and our supply chain, we will monitor the effectiveness of these actions on a year-over-year basis to assess our effectiveness, and we will review and update our processes, as required.

Over the remainder of the next reporting period, we expect to measure:

- The number of vendors identified as high-risk with respect to Modern Slavery concerns; and
- The number of employees undergoing training sessions on Modern Slavery.

10. APPROVAL AND ATTESTATION

This report was approved by the Board of Directors of BTG on May 29, 2024.

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.

Signed on May 31, 2024



I have the authority to bind Blinds To Go Inc.

Richard Shiller

Assistant-Secretary