

Notre Dame Agencies Limited

Forced Labour and Child Labour Supply Chain Assessment



Notre Dame Agencies Limited is committed to the protection of human rights in all our business practices and operations. This includes the prevention of modern slavery, forced labour and child labour in both our internal business practices and supply chains. Notre Dame Agencies Limited abides by all regulations from the Province of Newfoundland and Labrador that governs occupational health and safety and employment standards. Our company code of conduct policies are documented in the employee handbook which was updated in 2024. We have begun the process of incorporating practices in our operation to fight against forced labour and child labour.

Structure, Activities & Supply Chain

Notre Dame Agencies Limited is a private company incorporated in 1952 (business#103945564RT0001) and operates Notre Dame Castle Building Centres, Notre Dame Home Furnishings and Notre Dame Recreation locations across Newfoundland and Labrador. Our organization's financial reporting year covered in this report is March 1, 2023 – February 29, 2024 and has a staff of 180 people. Notre Dame Agencies Limited satisfies the definition of an Entity as defined within the act.

Structure

Notre Dame Agencies Limited is a retailer of building materials and hardware, furniture, electronics and appliances as well as recreational vehicles parts and accessories through its stores throughout Newfoundland and Labrador. Head office management is located in Lewisporte.

The company is a member of two major Canadian buying groups, Castle Building Centres with its head office located at 100 Milverton Drive, Suite 400, Mississauga Ontario, and a furniture, electronics and appliance buying group, Cantrex which is located at 9900 Cavendish, Suite 400, St. Laurent, Quebec.

The majority of goods purchased for resale are bought within the buying groups. The company does purchase directly from other major Canadian manufacturers as well.

Notre Dame Agencies does not have any reporting requirements in any other jurisdictions.

Activities

Notre Dame Agencies operates within the retail sector of Newfoundland and Labrador. The company has locations in the following areas:

Notre Dame Castle Building Centres

- Lewisporte, Twillingate, Grand Falls Windsor, Springdale, Corner Brook, Port aux Basques, Gander, Pound Cove, Clarenville and Happy Valley Goose Bay

Notre Dame Home Furnishings

- Lewisporte, Twillingate, Grand Falls Windsor, Port aux Basques, Gander, Clarenville and Happy Valley Goose Bay

Notre Dame Recreation

- Lewisporte, Happy Valley Goose Bay

The following chart lists the main categories of retail consumer goods that Notre Dame Agencies Limited offers to customers in their stores:

| | | |
|-------------------|-------------------------|----------------------|
| Appliances | Paint | Insulation |
| Furniture | Concrete | Kitchen |
| Electronics | Custodial | Lumber, plywood, OSB |
| Lumber | Doors | Metal Products |
| Roofing Products | Drywall | Mouldings |
| Hardware | Electronics & Lighting | Outdoors |
| Housewares | Flooring | Plumbing and Bath |
| Off road clothing | Recreational Vehicles | Siding |
| Boats | Rec Parts & Accessories | Tools |
| Lawnmowers | Windows | |

Supply Chain

Notre Dame Agencies procures most of its goods for retail sales from its two main purchasing channels: Castle Buying Group for the building supply and hardware business and Cantrex buying group for its purchases of furniture, appliances and electronics. Suppliers have to be approved by the respective buying groups before Notre Dame Agencies can purchase through them. Companies approved through these buying groups are mostly based in Canada and the United States. We have reviewed our supplier list through these groups and have found the majority are Canadian businesses.

The company retails products from many well-known manufacturers with examples such as GE Appliances, Bombardier recreational vehicles, Honda, Husqvarna, Suzuki and Samsung. Notre Dame Agencies also retails Canadian commodity goods for the building supply industry such as lumber and plywood.

Notre Dame Agencies currently has limited visibility on the full geographical reach of its suppliers' locations and limited knowledge of the origination of where suppliers source their goods. Notre Dame Agencies has not yet preformed an analysis of indirect suppliers, for the purposes of reporting under the act.

Policies

Notre Dame Agencies has the following internal policies in place relevant to this Act:

1. Workplace Harassment and Violence
 - a. Outlines Notre Dame Agencies Limited stance against harassment and violence and establishes procedures and guidelines for reporting incidents of violence, intimidation, harassment, sexual harassment and bullying on company premises, at company events or while conducting company business.
2. Open Door Policy
 - a. Fosters a culture of transparency and trust, where employees feel empowered to voice their concerns, ideas and feedback directly to supervisors or company management.
3. Code of Business conduct
 - a. Notre Dame Agencies has a policy manual which details appropriate behaviour and ethical standards for employees. This promotes integrity, professionalism and ethical decision making and good judgement.

Due Diligence & Risk Assessment

Notre Dame Agencies has contacted its buying groups concerning the act and have viewed the report findings by Castle Building Centres. The company has also procured the online reports of many of its major direct suppliers to ensure compliance. Notre Dame Agencies has no grounds based on this research to believe a supplier is operating in violation of the act.

The company has also had a representative determine risk in our supply chain by reviewing the Walk Free's Global Slavery index online, they have also taken a detailed review of the US Department of Labor's list of Goods produced by Child Labour or Forced labour. Through this research, it was deemed that the company has a low inherent risk of child or forced labour in their supply chain activities.

While we know that some of our vendors purchase goods from foreign countries, we do not know the full extent to where our vendors purchase their goods from. We are also aware that we purchase highly finished goods built with multiple materials and that each material may contain a different risk profile for supply chain risks.

Assessing Effectiveness & Training


Notre Dame Agencies does not currently have specific training in place relevant to forced labour or child labour. However, Notre Dame Agencies requires each employee to review the policy handbook to ensure they understand company expectations, standards and code of ethics. Sections of this handbook address workplace harassment and violence and an open-door policy. Notre Dame Agencies recognizes the opportunity to enhance employee training relevant to this Act, by incorporating training on forced labour and child labour. Notre Dame Agencies will evaluate applicable trainings for staff in the foreseeable future.

Approval for this statement

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.

Name: Tina Belbin

Title: President

Signature: 
I have the authority to bind Notre Dame Agencies

Date: May 30, 2024