Report for the Financial Year Ended January 31, 2026

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") requires certain entities doing business in Canada to disclose their efforts to in an effort to identify and remove forced labour and child labour in their supply chains.

Giampaolo Investments Limited (the "organization") supports the goals of the Act and takes seriously its responsibility to promote safe labour practices. To address the requirements of the Act, the organization discloses the following:

Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

The Act requires reporting entities to describe what steps they have taken in the previous financial years to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced or imported into Canada by the organization. As described below, the organization does not produce goods but, rather, recycles them. The source of material to be recycled originates both domestically and internationally. The organization has established corporate policies and due diligence processes to reduce the risk of forced labour and child labour within its supply chains.

Structure, Activities and Supply Chains

Structure. The organization is a privately held corporation incorporated in the Province of Ontario pursuant to articles of amalgamation on 2/1/2016.

Activities. Giampaolo Investments Limited (GIL) is an industry-leading, innovative real estate and land development company focused on delivering high-quality residential, industrial, and design-built solutions throughout North America.

Supply Chains. Due to the nature of this business there are no material suppliers; however, for the items used in the day-to-day business which require a supply of equipment or material (primarily office supplies) this entity sources operating equipment and supplies (including PPE) from established vendors.

Policies and Due Diligence Processes in relation to Forced Labour and Child Labour

(i) Policies

This organization has adopted a code of conduct and policies based on our core values and which has a focus on customer service, excellence and integrity (the "Policies").

The Policies apply to all employees and employees are provided training on the Policies as well as any updates to the Policies. All employees must read, understand, and comply with the Policies. Employees are provided with training related to human rights and are instructed to be mindful when assessing business activities for actions or omissions which might be contrary to applicable law.

Further, in conjunction with the organization's Policies, it strives to hold suppliers accountable to applicable legal requirements and best practice standards related to human rights.

(ii) Processes

The organization's due diligence process consists of both direct and indirect efforts. Internal controls to monitor processes have not identified any material risk of forced or child labour. Indirectly, the protocols which have been established through the supply chain are monitored but there is an inherent risk when receiving metal given its ability to be formed, melted and reused. Full tracing of metal to its origin is rarely possible.

The organization strives to hold suppliers accountable to applicable legal requirements and best practice standards related to human rights. Reputable suppliers are engaged while relationships with non-reputable suppliers are not.

Employees are empowered to monitor for compliance, including through requests for suppliers to submit information and documentation.

Identifying Forced Labour and Child Labour Risks

The organization acknowledges that no industry can be assumed to be entirely free of forced labour and child labour risks and is aware of the need to identify risks in its supply chains. Through internal assessments, the organization has identified the potential for these risks in certain categories of goods that it procures from foreign jurisdictions with a history of known or suspected forced and child labour violations, specifically mining, packaging, garments, and metal/mineral extraction.

The organization is not aware of any active risks but recognizes that change is constant. The organization consistently looks at opportunities for improvement to our risk assessment.

At this time, the organization believes its policies and procedures are sufficient to address the potential risks of forced labour and child labour. The organization will continue to monitor for potential risks and risk factors of forced labour and child labour in its activities and supply chains.

Remediation Measures (including Remediation of Loss of Income)

The organization has not identified any instances of forced labour or child labour in its supply chains and therefore the question of remediation is not applicable.

Training

When the Policies were implemented, as well as during the onboarding process for new employees, the organization made the document readily accessible and provided employees with awareness-raising activities about the Policies and their related issues and concerns. Employees are required to acknowledge the policies and procedures provided to them.

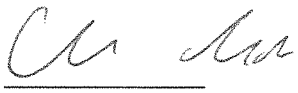
Assessing Effectiveness

To assess the effectiveness of the foregoing measures, the organization engages in a process of continuous improvement which includes, but is not limited to, periodic reviews of its corporate policies to determine whether updates are warranted, and a review of and engagement with ethical supply chains.

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 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 on this 27th day of February, 2026.



Christopher Galifi
Chief Executive Officer