

# Code of Conduct Policy for Suppliers

## Forced and Child Labour and Human Rights

### Introduction

This document outlines the code of conduct policy for suppliers of our company, which is based on the principles of bill S-211, the Modern Slavery Act, in Canada. The purpose of this policy is to ensure that our suppliers respect and uphold the human rights and dignity of all workers in their operations and supply chains, and to prevent any form of forced or child labour, human trafficking, or modern slavery.

### Scope and Application

This policy applies to all suppliers of goods and services to our company, as well as their subcontractors, agents, and affiliates. Suppliers are expected to comply with this policy, as well as all applicable laws and regulations in the countries where they operate. Suppliers are also expected to communicate this policy to their workers, subcontractors, agents, and affiliates, and to monitor and report on their compliance.

### Definitions

For the purposes of this policy, the following definitions apply:

- **Forced labour:** any work or service that is exacted from a person under the threat of penalty or coercion, and for which the person has not offered themselves voluntarily. This includes debt bondage, bonded labour, human trafficking, and involuntary prison labour.
- **Child labour:** any work that deprives children of their childhood, their potential, and their dignity, and that is harmful to their physical and mental development. This includes work that interferes with their education, exposes them to hazardous or harmful conditions, or is performed by children below the minimum age of employment as defined by the International Labour Organization (ILO) or the national law of the country, whichever is higher.
- **Human rights:** the rights and freedoms that are inherent to all human beings, regardless of their race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. These include the rights and freedoms enshrined in the Universal Declaration of Human Rights and other international human rights instruments.
- **Modern slavery:** a term that encompasses various forms of exploitation and abuse of workers, such as forced labour, child labour, human trafficking, servitude, and slavery. Modern slavery occurs when a person is deprived of their freedom and is exploited for personal or commercial gain.

## Policy Statement

Our company is committed to conducting its business in a responsible and ethical manner, and to respecting and protecting the human rights and dignity of all workers in its operations and supply chains. We do not tolerate any form of forced or child labour, human trafficking, or modern slavery in our business or in our supply chains. We expect our suppliers to share this commitment and to adhere to the following principles:

- Suppliers shall not use or benefit from any form of forced or child labour, human trafficking, or modern slavery in their operations or supply chains.
- Suppliers shall ensure that all workers are employed voluntarily, and that they have the freedom to terminate their employment at any time, without penalty or coercion.
- Suppliers shall not retain or withhold any personal documents, identity papers, or wages of their workers, or impose any fees or charges on their workers for recruitment, placement, or employment.
- Suppliers shall not subject their workers to any physical, verbal, sexual, or psychological abuse, harassment, intimidation, or discrimination.
- Suppliers shall respect the right of their workers to freedom of association and collective bargaining, and to participate in or form trade unions of their choice.
- Suppliers shall pay their workers at least the minimum wage and provide them with the legally mandated benefits and overtime compensation, as well as a safe and healthy work environment.
- Suppliers shall not employ any children below the minimum age of employment as defined by the ILO or the national law of the country, whichever is higher, or expose them to any hazardous or harmful work.
- Suppliers shall respect and uphold the human rights of all workers in their operations and supply chains and prevent any adverse human rights impacts or violations.

## Compliance and Reporting

Suppliers are required to comply with this policy, as well as all applicable laws and regulations in the countries where they operate. Suppliers are encouraged to report any concerns or violations of this policy, or any suspected or actual cases of forced or child labour, human trafficking, or modern slavery in their operations or supply chains, to our company through the following channels:

- Email: [compliance@modernsales.ca](mailto:compliance@modernsales.ca)
- Phone: 705-798-0154

Our company will treat all reports confidentially and will not tolerate any retaliation or reprisal against anyone who reports in good faith. Our company will investigate all reports promptly and thoroughly and will take appropriate actions to address any confirmed violations or risks. Our company reserves the right to terminate its relationship with any supplier who fails to comply with this policy, or who engages in any form of forced or child labour, human trafficking, or modern slavery in their operations or supply chains.

## Review and Update

This policy will be reviewed and updated periodically to reflect any changes in the legal and regulatory environment, the industry best practices, or the expectations of our stakeholders. Suppliers will be notified of any changes and will be expected to comply with the updated policy.