

## Modern Slavery Report FY24

### Who We Are

At The Canadian Brewhouse Group of Companies (the “Group”), our core purpose is to be the place people want to be. This commitment drives everything we do. Our exceptional training programs, generous discounts, and exciting competitions with our BrewCrew are all designed with one goal in mind: to be the place all people want to be, for our guests and for our team.

### Our Values

At The Canadian Brewhouse, we live by six Core Values that keep the team strong and customers coming back: Take Care of Each Other and Yourself, Think Like A Customer, Support Your Community, Hurry Don’t Rush, Embrace Innovation, and Be Persistent.

### Overview

This report covers the Group’s response to Canada’s Modern Slavery Act (the “Act”). The document outlines our Supplier Code of Conduct and Fair Labour Practices, as well as our attestation and public disclosure statements. These components demonstrate our commitment to living through our core values by upholding high standards of ethics, labour rights, and transparency in our operations.

**THE CANADIAN BREWHOUSE**

**CORE VALUES**

- TAKE CARE OF EACH OTHER AND YOURSELF**  
The Brew Crew is our number one priority.
- THINK LIKE A CUSTOMER**  
Ask yourself regularly how you would like to be treated as a customer and what you would like to get out of a similar experience.
- SUPPORT YOUR COMMUNITY**  
Food saving and community involvement is a fundamental part of who we are.
- HURRY, DON'T RUSH**  
Always act with a sense of urgency, without sacrificing quality in the final product.
- EMBRACE INNOVATION**  
Change is necessary for professional and personal growth. The Canadian Brewhouse is a proud leader of innovation in the restaurant industry.
- BE PERSISTENT**  
Do not stop until you get the desired result. Be persistent in working towards all of your goals.

**OUR HOUSE IS YOUR HOUSE**

## Supplier Code of Conduct

The Group is committed to conducting its business in an ethical, legal, and socially responsible manner. This commitment extends to our suppliers and partners, who play a crucial role in our supply chain. Our Supplier Code of Conduct (the “Code”) outlines the principles and expectations we have for our suppliers regarding business conduct, labour practices, environmental stewardship, and compliance.

We expect all suppliers to adhere to this Code, which includes:

### Compliance with Laws and Regulations

Suppliers must comply with all applicable laws, regulations, and industry standards in the jurisdictions where they operate. This includes but is not limited to laws related to labour, human rights, environmental protection, anti-corruption, and health and safety.

### Ethical Business Conduct

Suppliers must conduct their business with integrity, honesty, and transparency. This includes:

- Avoiding bribery, corruption, extortion, and other unethical practices.
- Respecting intellectual property rights and confidentiality agreements.
- Providing accurate and truthful information in all dealings with the Group and other parties.

### Labour Practices

Suppliers must uphold fundamental labour rights and provide safe, fair, and healthy working conditions for their employees. This includes:

- Prohibiting child labour and forced labour in all forms.
- Respecting freedom of association and the right to collective bargaining.
- Providing fair wages, reasonable working hours, and benefits in compliance with applicable laws and industry standards.
- Ensuring a workplace free from discrimination, harassment, and abuse.

### Environmental Stewardship

Suppliers must minimize their environmental impact and strive to operate in an environmentally sustainable manner. This includes:

- Complying with environmental laws, regulations, and permits.
- Implementing practices to conserve resources, reduce waste, and minimize pollution.
- Promoting the use of renewable energy sources and environmentally friendly technologies.
- Encouraging the adoption of eco-friendly practices throughout their supply chain.



### Health and Safety

Suppliers must prioritize the health and safety of their employees, contractors, and visitors. This includes:

- Providing a safe and healthy work environment, free from recognized hazards.
- Implementing appropriate safety policies, procedures, and training programs.
- Conducting regular inspections and assessments to identify and mitigate health and safety risks.
- Ensuring access to necessary personal protective equipment and medical facilities.

### Continuous Improvement

Suppliers are encouraged to continually improve their business practices and performance in line with this Code of Conduct. This includes:

- Setting measurable goals and targets for ethical, social, and environmental responsibility.
- Regularly assessing and reporting on progress towards these goals.
- Engaging with the Group and other stakeholders to share best practices and lessons learned.

By adhering to this Supplier Code of Conduct, suppliers demonstrate their commitment to ethical business practices, social responsibility, and sustainable development. The Group reserves the right to assess supplier compliance with this Code and take appropriate action in cases of non-compliance.

### **Fair Labour Practices**

The Group has implemented measures to prevent and mitigate the risk of forced and child labour throughout the production of goods, both in Canada and internationally. These efforts are part of our broader commitment to maintaining ethical business practices and ensuring the integrity of our company and global supply chains.

Our efforts have been particularly focused on enhancing the mechanisms through which we monitor and improve labour standards throughout our production and distribution networks. These efforts include:

### Employee Training

During company training, we emphasize our stance against forced labour to all employees by integrating the Act into our onboarding and orientation process. Refer to our New Hire Package for further details on training and reporting protocols.

### Recruitment and Selection Policy

We have updated our labour policies to offer clearer guidelines on ethical recruitment and treatment of workers. Canada's Temporary Foreign Worker (TFW) Policy and our Internal Recruitment Policy are both disseminated throughout our network, ensuring that they are understood and implemented uniformly.

### Risk Assessments

Regular risk assessments help us identify potential vulnerabilities within our operations and supply chain. These assessments inform our strategies and resource allocation, allowing us to preemptively address possible issues before they arise. Our Procurement Purchasing department oversees these assessments comprehensively, while our People Programs and Partnerships department specifically manages the labour-related aspects of the assessments.

### Immediate Remediation Response

If risks are identified, the company will reassess continued relations with the supplier, pending their own review of our findings. Should the supplier fail to appropriately address our findings, the employer may terminate the relationship with the supplier.

### Public Accessibility and Transparency

Public accessibility and transparency are centered in the disclosure available on our website. This transparency is fundamental to our commitment to corporate responsibility and ethical business practices.

### Continuous Improvement

The effectiveness of our policies and strategies is evaluated through both internal and external mechanisms, including the following performance indicators:

- Audit Program: We voluntarily use external auditors, such as KPMG, to audit our company policies to ensure we are meeting these ethical standards.
- Employee Awareness Levels: We regularly update our orientation process to ensure employees are thoroughly trained and updated on our policies.



## Approval and Attestation

The Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of the Canadian Brewhouse Group of Companies.

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.



**Mike Wheeler**

Chief Operating Officer

May 31, 2024

I have the authority to bind The Canadian Brewhouse Group of Companies.

## Public Disclosure

At The Canadian Brewhouse Group of Companies (the “Group”), we are deeply committed to protecting human rights across every level of our operations and throughout our entire supply chain. We firmly believe that every individual has the right to work in an environment that ensures safety, fairness, and equal opportunities for success. Upholding these values is not just a policy, but a core principle that shapes our corporate culture and business practices. We are dedicated to creating and maintaining workplaces where respect and dignity are upheld for all.

Any act of forced labour or child labour within our supply chain is unacceptable and, if identified, will be addressed in compliance with our policies and procedures.

The Group has consistently shown a deep commitment to enhancing practices across our entire supply chain to mitigate the risk of human rights violations. We hold our suppliers to the highest human rights standards, as detailed in our Supplier Code of Conduct.

In addition, the Group continuously works to ensure that all aspects of our operations reflect our dedication to ethical practices, as outlined in our Fair Labour Practices document. Our initiatives include a voluntary external auditing process to monitor company compliance and expanding our employee training programs to cover newer regulations and ethical considerations. These efforts ensure that both our staff and partners are well-versed in identifying and addressing potential human rights abuses effectively.

We understand the importance of keeping our stakeholders informed and involved in our continuous journey towards a more ethical and sustainable business model. Thank you for your ongoing support as we strive to make a positive impact in the world.



**Mike Wheeler**

Chief Operating Officer