

Andrews Senior Care Inc

2023 Modern Slavery Act Report

Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023

Submitted May 31, 2024

Identifying Information

This report is submitted by Andrews Senior Care Inc, a single entity, as required in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, also known as the Modern Slavery Act (the “Act”). The period to which this report relates commenced on February 1, 2023 and ended on January 31, 2024. This is not a revised version of a previously-submitted report.

Andrews Senior Care’s provides assisted living and long term care accommodation services to seniors in PEI and New Brunswick. The organization prides itself on providing exceptional resident care and treating all residents and employees with person centred care that reflects the way we would want to be treated

Policy Statement on Human Rights

Andrews fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour, including in our operations and our supply chains. Respect for human rights and person centred care is fundamental to our values and to the well-being of our residents and team members.

As set out in the United Nations Guiding Principles on Business and Human Rights (“**UNGPs**”), business enterprises have a responsibility to respect internationally recognized human rights. The responsibility to respect human rights requires that business enterprises: (a) Avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur; and (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.

In 2024, we will begin to assess the potential for our operations to cause, contribute to, or be directly linked to adverse human rights impacts, including forced labour and child labour. Currently, we are of the view that there is low risk that our operations have caused or contributed to adverse human rights impacts. We note that the guidance implies that Andrews Senior Care would not be required to report under the Act, however there is friction between the guidance and the act. We have decided to submit a report in the interest in meeting the spirit of the initiative, which we agree with overall. However we note that our purchases outside of Canada are minor at best and that we feel that our overall activities are low risk from a human rights and modern slavery perspective.

Andrews Senior Care is headquartered in Charlottetown, PE and operates in PEI and NB.

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

What steps have been taken to prevent and reduce the risk that forced labour and/or child labour is used at any step in the production of goods? – Section 11(1)

Andrews has begun to consider more fully the minor purchases from overseas and whether they warrant the inherent risks, however minimal. Overall, Andrews fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour, including in our homes and our supply chains. Respect for human rights is fundamental to our values and to the well-being of the communities in which we operate.

In 2024, Andrews will begin to take steps to promote the objectives of the Act and is considering implementing actions to achieve that goal that may include:

- Monitoring employee recruitment for indications of forced and child labour
- Gathering information, including conducting an internal assessment of risks of forced labour and/or child labour in our organization’s activities and supply chains
- Updating existing relevant policies and procedures
- Creating a supplier code of conduct

Structure, Activities, Supply Chains

Structure of Andrews Senior Care – Section 11 (3)(a)

Andrews Senior Care Inc is a corporation registered in Canada and doing business in PEI and NB. It has 6 subsidiaries, each of which provides assisted living and long term care accommodation to seniors. The organization owns its own land and buildings and employs over 400 people.

Activities involving supply chains – Section 11 (3)(a)

The majority of Andrews operating expenses relate to employee wages (70%+) with the remainder being primarily building related expenses, equipment and food. All labour costs are incurred within Canada and the vast majority of other expenses are local, or used to purchase supplies or equipment from large reputable suppliers within Canada. Foreign purchases are extremely limited and considered to be minor relative to the intent of the Act.

Policies and Due Diligence Processes

What policies and due diligence processes are in place related to forced and/or child labour? – Section 11(3)(b)

Currently, Andrews does not have specific policies or due diligence in place specifically related to forced and or child labour. However, Andrews is committed to monitoring and reducing the risks of forced and/or child labour in its operations and supply chains. Andrews intends to continue to monitor supply chains and associated risks and will develop or amend appropriate policies, procedures, and codes of conduct to promote the objectives of the Act.

Activities and Supply Chains that Carry Risk of Forced and Child Labour

Has the organization identified activities and supply chains that carry a risk of forced and/or child labour being used? – Section 11 (3)(c)

Andrews has not identified activities and supply chains that carry a risk of forced and/or child labour; however, Andrews anticipates taking steps to begin assessing the process of identification as discussed above.

Measures to Remediate Forced or Child Labour

Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains? – Section 11(3)(d)

Andrews has not identified any forced or child labour in its activities or supply chains and, therefore, has not taken any measures to remediate.

Measures to remediate loss of income to vulnerable families

Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour in its activities and supply chains? – Section 11(3)(e)

Having not identified any forced or child labour in its activities or supply chains, Andrews has also not identified any loss of income to vulnerable families resulting from measures taken, as no measures were taken.

Training for Employees on Forced and Child Labour

Does the organization currently provide training to employees on forced labour and/or child labour? – Section 11(3)(f)

Andrews does not currently provide training to employees on forced and/or child labour given the low risk associated with its business activities. The topic is covered more generally by our values and code of conduct however.

Assessing Effectiveness

Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and/or child labour are not being used in its activities and supply chains? – Section 11(3)(g)

Andrews has not taken steps to assess its effectiveness in ensuring that forced labour and/or child labour are not being used in its activities and supply chains. As we continue to review our risk profile we will make changes as required.

Approval and Attestation

Approval of the annual Modern Slavery Act report by the governing body of SaskAbilities' – Section 11(4)(a).

Our Board of Directors passed the following motion:

In accordance with Section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the Board of Directors reviewed and approved Andrew's Modern Slavery Act Report.

An attestation shall be signed by a member of the governing body of SaskAbilities – Section 11(5)(a)(b).

I attest, on behalf of the Board of Directors of Andrews Senior Care Inc., that the Board of Directors reviewed the information contained in its Modern Slavery Act Report and that the information contained in the report is true, accurate, and complete.

This report is prepared pursuant to the criteria for a single entity and is approved by:

Jeff Murphy

Jeff Murphy
President
Andrews Senior Care
May 31, 2024