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# BIG WHITE SKI RESORT LTD.

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## 2024 Modern Slavery Report

### 1. **INTRODUCTION**

This Report is prepared by Big White Ski Resort Ltd. (“Big White” or the “Corporation” or “our” or “we”) for the financial year ending May 31, 2024 (the “Reporting Period”) and sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Corporation.

This Report constitutes the first report prepared by the Corporation pursuant to Canada’s new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

### 2. **STEPS TO PREVENT AND REDUCE THE RISK OF FORCED LABOUR OR CHILD LABOUR**

Big White is committed to the ethical sourcing and procurement of goods and services, with a strong focus on preventing and reducing the risks of forced labour and child labour within our supply chain. The Company recognizes the importance of upholding human rights and ensuring fair labour practices within the resort with respect to the services provided as well as in the products sold.

One of the key initiatives undertaken by Big White is the review of all new suppliers of retail goods to understand where the products are made and our selection of vendors based on their reputation on quality and commitment to sustainable practices. Big White prioritizes selecting vendors from Canada whenever possible as part of its commitment to supporting local businesses and communities, and understanding that Canadian establishments would be subject to a higher level of governance, reducing the risk of child and forced labour in its supply chain.

### **3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

Big White is a Corporation incorporated under the Business Corporations Act, with operations at Big White Ski Resort near Kelowna, BC. Big White is a destination resort attracting visitors from all over the world for the world class skiing and snowboarding experience, as well as mountain biking and hiking in the summer months.

Big White's primary business activities consist of the following:

- Operating and maintaining ski runs and chairlifts for ticket holders and events
- Food & Beverage service
- Retail sale of goods
- Rental of equipment
- Lessons
- Other ancillary resort activities and services for guests

This report covers our in-scope activities where goods are imported into Canada by Big White, however these activities are generally low in both volume and value. Big White primarily deals with Canadian brokers when purchasing our goods for sale or for use, however occasionally will source products directly if needed.

Our major suppliers for the ski lifts, equipment and related parts are located in Canada or in the European Union. As these are specialized products in the ski industry there are only a handful of large vendors that manufacture and supply to Big White.

Big White operates a number of retail outlets offering hard goods (ski and snowboard equipment, bikes and accessories), clothing and protective gear, as well as souvenir products. Many of our major suppliers are part of publicly traded entities that must meet the sustainability, social, and environmental requirements of multiple jurisdictions including the the UK where its Modern Slavery Act of 2015 required these companies operating in the UK to be compliant with its regulations.

### **4. COMPANY POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR**

During the Reporting Period, Big White has implemented a number of improvements in our processes to reduce the risk of forced labour and child labour in our supply chains. The areas of focused improvement in our processes included the following initiatives:

- a. Supplier due diligence – review of publicly available reports, and tailored questionnaire
- b. Risk assessment based on product and region of production

- c. Updating our Code of Conduct and Employee Handbook to include a policy against child labour, or any form of forced labour without proper consent
- d. Documentation of our review

#### **5. ASSESSING AND MANAGING THE RISK OF FORCED LABOUR OR CHILD LABOUR IN OUR SUPPLY CHAINS**

Big White uses a risk-based approach to assess and manage its risk of forced labour and child labour. This is used in combination of country risk indicators, the type and volume of products purchased, and any prior findings related to the suppliers.

#### **6. REMEDIATION OF ANY FORCED LABOUR OR CHILD LABOUR**

Our Code of Conduct and Employee Handbook is updated to include our policy against forced labour or child labour with a mechanism for reporting, investigation, and documentation for our employees to report actual or suspected violations or risk areas. The updated documents will be provided to our employees for review and acknowledgement starting in the next reporting period. In the event of non-compliance, Big White will work to develop and implement a corrective plan to improve and remedy the situation. There have not been any reported instances of forced labour or child labour in the Reporting Period.

#### **7. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR**

The team responsible for the procurement of goods in the retail business are senior managers who understand Big white's commitment to its sustainable and social practices. This team is also responsible for the recommendations to improve our review procedures for new vendors and supplier due diligence. In addition, our employees are trained on the Code of Conduct each season at the annual employee orientation and will be required to review and acknowledge their understanding of the Code.

#### **8. ASSESSMENT OF EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT BEING USED IN OUR BUSINESS AND SUPPLY CHAINS**

Our assessment of effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains will be through the annual review of documentation and ensuring that procedures designed are being followed as intended, through the use of checklists and review sign-offs. These measures will be implemented and tracked in future reporting periods.

**9. APPROVAL AND ATTESTATION**

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Big White Ski Resort Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Big White Ski Resort Ltd.

Per: 

Jeanie McLean, CFO & Director

Big White Ski Resort Ltd.

Date: May 29, 2024