

# **Canadian Modern Slavery Act Report**

**Canadian Contract Cleaning Specialists, Inc.  
(Business No. 887769073)**

**STATEMENT AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS MADE PURSUANT TO THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT, REFERRED TO AS THE “MODERN SLAVERY ACT” (THE “ACT”) FOR THE YEAR ENDING DECEMBER 31, 2023**

**I. Introduction**

This Report is made pursuant to the reporting requirements contained in *Fighting Against Forced Labour And Child Labour In Supply Chains Act* (S.C. 2023, c. 9) on behalf of Canadian Contract Cleaning Services, Inc., (“CCCSI”) a privately-held Corporation organized under the laws of Canada, with a principal place of business in Alberta. This Report sets out CCCSI’s actions to identify and understand any forced labour or child labour risks related to its business and describes the policies and processes the Company has in place to combat these potential risks in our business and supply chain.

This Report has been approved by CCCSI’s board of directors (the “Board of Directors”). All information provided in this Report pertains to Canadian Contract Cleaning Services, Inc., as the entity required to report pursuant to Section 11(1) of the Act. All information presented in this Report is current as of the date set forth above unless otherwise indicated.

**II. Our Company Structure, Activity, and Supply Chain**

CCCSI<sup>1</sup> is a food safety company with a team of skilled sanitators, food safety experts, technical design experts, and safety specialists armed with science to protect the food supply chain in Canada. CCCSI positions itself as a specialized independent contractor retained by food processors throughout Canada. Our services are typically performed in the early morning hours at the conclusion of our customers’ second-shift operations, and before first-shift production. As a function of our contracting and partnerships with companies and brands, CCCSI must agree to uphold the highest ethical standards as part of our customer’s supply chain and processing operations, and observe all premises rules and regulations while our employees are deployed on their properties.

CCCSI sustains and grows its business through long-term relationships and credibility amongst food processors for operational excellence, personal and food safety, and a shared commitment to strict standards of ethics and compliance. As part of our growth strategy, we target prospective customers who value and seek partnership because of our differentiating safety and compliance culture. Prospective and current customers seriously consider business, ethical, and reputational risks associated with outsourcing any part of their operations, and hold CCCSI to a high standard as a condition of winning and retaining sanitation services opportunities with them. In turn, CCCSI must prioritize compliance, ethics, and safety, in addition to demonstrating operational excellence, to remain competitive.

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<sup>1</sup> CCCSI has a registered trade name that is operates under in Canada, “PSSI.”

CCCSI is a wholly-owned subsidiary of Packers Sanitation Services, Inc., Ltd., a United States-based limited liability company, organized under the laws of the State of Ohio. Packers Sanitation Services, Inc., Ltd. does not have any operations in Canada.

### **III. Our Commitments**

CCCSI fully supports efforts to end forced labour, human trafficking, child labour, and modern slavery. The Company's commitments are absolute: we do not want a single person coerced into employment in any capacity for CCCSI, nor do we want anyone working for CCCSI before reaching age 18. These commitments begin at the highest levels: with our Executives and Board of Directors. The Executives and Board of Directors begin all meetings by first reviewing Company safety and compliance metrics, before discussing commercial and operational matters. CCCSI's executive leadership team reviews and tracks all Company-wide compliance and ethics metrics, receives updates on key issues and emerging trends, and provides oversight to the Company to continually improve.

### **IV. Our Risk Assessment**

In assessing the risk points where, unbeknownst to the Company, such commitments could be violated, CCCSI considered: its role as a contractor, its limited sourcing of products and materials from outside of Canada, its industry, geography, work type, working hours, and hiring and supervision structure.

Our assessment viewed our supply chain exposure as low risk. Because CCCSI positions itself as a specialty contractor, and because it does not in turn use recruiting firms, staffing agencies, temporary agencies, or other forms of labour sourcing or subcontracting, our assessment identified downstream supply chain exposure as low. CCCSI does not have a significant import or materials footprint, as most inputs to the business are at the property where we work and are sourced by the customer.

CCCSI identified and has focused its programming on labour and employment risks within the Company, and its hiring and management of CCCSI personnel. More generally, the food processing and associated industries are among several sectors in developed economies that could be susceptible to labour violations because employers offer competitive wages and on-the-job training for workers with little or no prior experience, technical skills, or language proficiency. In other words, the food processing industry and associated industries provide high-paying "gateway" employment for immigrants, and other disenfranchised and marginalized workers. Monitoring and mitigating this risk required CCCSI to invest and enhance several areas to strengthen its compliance culture and bolster a multi-layered compliance program with redundant preventative steps. Together, these enhancements realistically and substantially impact the Company's protections against the employment of underage or exploited workers.

### **V. Our Policies and Programs Prohibiting Modern Slavery, Human Trafficking, and Child Labour**

CCCSI has established a variety of relevant policies and training programs to address modern slavery, human trafficking, and child labour.

1. **Company Code of Conduct and Ethics:** The Company Code and Ethics outlines the required minimum standards we expect each and every employee, whether managerial or non-managerial, to meet or exceed while working for the Company. The expectation is not merely compliance with all applicable laws, rules, and regulations, but also responsible and ethical behaviour, and compliance. We do not tolerate behavior from any employee which deviates from these standards.
2. **Team Member Handbook:** All employees are presented with a Handbook outlining the Company's policies governing the workplace, the standards with which the Company must treat them, and the standards the Company expects the employees to maintain during their employment. The handbook provides every employee with numerous avenues to escalate concerns both within their Facility and through independent channels such as PSSI's Ethics hotline, described in greater detail below. Moreover, the handbook details the Company's whistleblower protections and strong position against retaliation for anyone who reports a concern.
3. **Anti-Human Trafficking Policy:** The Company published an Anti-Human Trafficking Policy affirming our commitment to eliminating coercion and trafficking in the Company or through any subcontractor or agent. The policy outlines many exemplary practices which are strictly forbidden, from the use of misleading information or fraud to recruit and retain employees, failing to disclose term and conditions of employment, charging employees for applications or work, and harassment, blackmail, or extortion. The policy and accompanying poster include numerous ways to report concerns to the Company or to third-party compliance specialists.
4. **Ethics Hotline:** Another aspect of CCCSI's controls is its adoption, publication, and promotion of a toll-free hotline, which employees were encouraged to utilize to report compliance concerns, anonymously or otherwise. Hotline reports are investigated by an independent Human Resources investigator.
5. **"See Something, Say Something" Campaign:** The Company also launched a "See Something, Say Something" campaign with its workforce, outlining the Company's absolute prohibition against child labour, and the team members' duty to speak up if they see anything suspicious relating to a team member's age warranting further investigation. During the training, PSSI is recomunicating information to all team members on how they can anonymously report any concerns, including age-related concerns, to a toll-free hotline.

6. **No Minors Pledge:** The company requires all employees as a condition of employment to sign a “No Minors Pledge.” With this, employees are notified that the Company does not allow anyone under age 18 to work in sanitation in any capacity, and that they should promptly report anyone who appears to be under age 18 they see at work regardless of whether they work for CCCSI, or another employer at a Facility. Finally, all employees agree that they will do their part in ensuring the protection of minors by keeping them out of hazardous work, such as sanitation. The Company’s goal with the pledge was to encourage all employees to feel agency in protecting vulnerable and exploited populations, and to mobilize them to work in the best interests of vulnerable populations.

CCCSI will continue to develop and maintain training modules that support our commitment to human rights, including the prohibition of slavery and human trafficking, adherence to labour laws, adherence to truthful and trustworthy practices when dealing with employees, proper disclosure of information, and verification processes.

## **VI. Monitoring & Remediation Measures**

CCCSI did not discover nor was made aware of any instances of forced labour or child labour in its operations during 2023 and, consequently, no remediation measures were required. If we do identify incidents of forced labour within our activities or supply chains, we will consider the appropriate remediation strategies in compliance with domestic and international standards.

## **VII. Assessing Effectiveness**

The Company primarily assesses the effectiveness of its policies and programs through monitoring and evaluating concerns raised through its Code of Conduct and Ethics Hotline and by conducting ongoing audits of its workforce. The Company also provides its employees a forum to raise any concerns through regular, confidential employee engagement surveys, the results of which are used to inform updates on the Company’s policies and changes to our workplace. To date, CCCSI has had no issues relating to forced labour or child labour raised through the Code of Conduct and Compliance Hotline nor any employment engagement survey.

## **VIII. Attestation**

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Canadian Contract Cleaning Specialists, Inc.

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.

CCCSI

By



Name

Douglas M. Steenland

Its

Chairman, Board of Directors

Date:

May 30, 2024