

# Colin Munro Pharmacy Group

## Modern Slavery Statement

May-24

The Colin Munro Pharmacy Group, which is a group of pharmacies located in various locations of British Columbia, Canada.

As a retail pharmacy, employer and member of our communities, we are committed to acting ethically and with integrity to ensure all our stakeholders are treated fairly. Our approach is to ensure the vendor products and service that we provide also operate with our values.

### **Organization structure and supply chains**

The Colin Munro Pharmacy Group's main business focus is retail pharmacies (99%) that have pharmacy and front store product offerings. The organization employs 300-350 employees who provide customer service and support the organization operations. In addition to our main business, there is some Canadian real estate holdings.

Our product purchases are 100% Canadian sourced. With 85-90% for our product line purchased from two Canadian wholesale suppliers

Our main source of goods are from Canadian Wholesalers that have the anti-slavery guidelines in place. The balance of our product purchases are from Canadian vendors who are expected to follow and provide ethical products within the anti-slavery guidelines.

The Colin Munro Pharmacy group is not an importer products under the guidelines of the Canadian Customs Act.

### **Our policies on slavery and human trafficking**

The Colin Munro Pharmacy Group of companies is committed to a zero-tolerance approach to modern slavery within its business, supply chains and partners.

We are committed to act ethically and with integrity in all business-related transactions and relationships.

### **Due diligence processes**

The Colin Munro Pharmacy Group will ensure that its employees are aware of the zero-tolerance policy when doing business with-in the companies and with Vendors, suppliers and services.

Complying with the policy is part of the terms and conditions of employment.

Our processes will include vetting of potential vendors and continuous monitoring of existing vendors.

### **Risk assessment and management**

We recognize that Modern Slavery exists in the world. Our policy is a zero-tolerance policy, which is communicated to our staff.

Consideration of the following key risk areas that may be open to modern slavery for our business are:

- Importing goods into Canada-Currently not part of our business practices.

- By ensuring that our vendors and suppliers in our supply chain follow our the Anti-Slavery policy of zero-tolerance in any anti-slavery practices.

**Key performance indicators to measure effectiveness of steps being taken**

Modern Slavery Act compliance is expected to be followed by our supply chain vendors and that our major vendors Modern Slavery policy to be available to ensure compliance.

**Training on modern slavery and trafficking**

Our Policies & Procedure and Code of Conduct forms are provided to each employee at time of hire, plus periodic reviews of the documentation and online access to the policies. Within this documentation, we outline what Modern Slavery is and our zero-tolerance towards Modern Slavery which includes guidelines for the employees to follow and how to report incidents.

We will provide training and guidelines for staff who are directly responsible for Procurement of goods and services

**Processes for reporting slavery and human trafficking**

We have/are providing training for our team to help prevent Modern Slavery:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

We have no reason for concern in relation to any current member of the supply chain and their compliance with the Modern Slavery Act.

**Reporting of modern slavery**

The Munro's Pharmacy Group policy & procedure manual will include instruction on how and where to report any incidents.

**Assessing effectiveness**

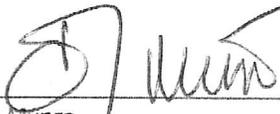
An assessment of the Modern Slavery policy will be performed by May 31 each year

The assessment will determine if the current policy is effective and whether additional criteria should be added to our policy for the prevention of reducing the risk of modern slavery in our supply chain.

**Approval and Attestation**

In accordance with the requirements of the Modern Slavery Act, I attest that I have reviewed the information contained in the report for the Colin Munro's Pharmacy Group. Based on my knowledge, and having exercised reasonable diligence.

I attest that the information in the report is true, accurate and complete.



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Colin Munro  
President & Shareholder  
Colin Munro's Pharmacy Group  
23-May-24