

GOODWILL INDUSTRIES ONTARIO GREAT LAKES
PREVENTING FORCED AND CHILD LABOUR STATEMENT

ARTICLE 1: INTRODUCTION:

- 1.1 Goodwill Industries Ontario Great Lakes (“**Goodwill**”) is committed to acting ethically and with integrity in our business and our supply chains (collectively, our “**business**”) and protecting the dignity and human rights of all people connected to our business. Goodwill seeks to foster inclusive workplaces and sourcing products responsibly and strive to work closely with our vendors and suppliers (collectively, “**suppliers**”) to ensure these objectives are implemented and maintained in their workforce and their supply chains.
- 1.2 This is Goodwill’s first modern anti-forced labour statement made pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the “**Supply Chains Act**”), This statement will be reviewed and, if necessary, revised annually.
- 1.3 Goodwill acknowledges that it cannot stop forced and child labour globally, but it does acknowledge that preventing forced and child labour within its supply chains is an important step in the long process of halting the practices of modern slavery worldwide.
- 1.4 This statement outlines the measures Goodwill has in place and the efforts Goodwill have implemented to assess and address risks of forced and child labour in our business.

ARTICLE 2: GOODWILL STRUCTURE AND ACTIVITIES

- 2.1 Goodwill is an Ontario not-for-profit corporation and registered charity with a financial reporting year ending on March 31st on each year. Its business number is 119023810 RR0002. Goodwill is a non-profit social enterprise that provides work opportunities, skills development and employee and family strengthening for people who face barriers such as disability or social disadvantage. The aim is to advance individuals, families and communities toward economic self-sufficiency and prosperity. Goodwill is a seller of goods in the non-profit thrift retail sector. Goodwill employs 1,210 people over 51 locations in Ontario only. Goodwill has a subsidiary entity, (the “Career Center”) whose activities include a team of professional trainers, employment specialists and counsellors offering a vast range of services for job seekers and employers seeking to hire. The unemployed, under-employed and those facing barriers can turn to the Career Centre for access to training, career exploration, job search, resume development and interview techniques. The Career Center does not produce or import any goods and does not independently meet the reporting thresholds set out in the Act.
- 2.2 To learn more about Goodwill, please see: <https://www.goodwillindustries.ca/>.
- 2.3 The activities of Goodwill involve:
 - (a) the receipt and resale of donated goods through Goodwill’s thrift retail stores;
 - (b) recycling programs;
 - (c) logistics and packaging services; and

- (d) food and hospitality services.

ARTICLE 3: OUR POLICIES

- 3.1 Goodwill has implemented an internal Anti-Modern Slavery Policy post March 31, 2024, that reflects our commitment implementing and maintaining processes to prevent forced and child labour from taking place in our business.
- 3.2 Goodwill raises awareness to its suppliers of its anti-modern slavery policies and requires its suppliers to adhere to the same high standards. Goodwill has implemented post March 31, 2024, a Supplier Code of Conduct that sets forth our expectations of all suppliers to Goodwill related to ethical business practices. A copy of our Supplier Code of Conduct can be found on our website at: <https://www.goodwillindustries.ca/anti-modern-slavery-policy>. Suppliers must sign a declaration acknowledging the Supplier Code of Conduct.

ARTICLE 4: OUR DUE DILIGENCE PROCESSES

- 4.1 Goodwill conducts background checks and annually reassesses our employment practices to ensure that Goodwill at the minimum meet employment standards in the locations Goodwill employs workers.
- 4.2 Post March 31, 2024, Goodwill reviewed its approach to supplier due diligence, and has completed a supplier risk-mapping assessment, starting with our key suppliers, in order to identify forced and child labour risks in our business. As part of this assessment, Goodwill has asked the majority of its suppliers to complete a supplier declaration supporting the Code of Conduct. Subsequently, Goodwill will ask the remaining suppliers to complete the same declaration. As Goodwill receives responses from its suppliers, Goodwill may undertake additional verifications and audits.

ARTICLE 5: ASSESSMENT OF RISK OF FORCED OR CHILD LABOUR

- 5.1 Within Goodwill's business operations, Goodwill has assessed a low level of risk based on the following risk criteria:
 - (a) **Country risk:** The Global Slavery Index describes the countries in which forced, or child labour is most prevalent.
 - (b) **Sector or industry risk:** Certain sectors have a higher risk of forced or child labour.
 - (c) **Business or transaction risk:** Certain business relationships or transactions have a higher risk of forced or child labour.
 - (d) **Raw materials risk:** Certain raw materials have a higher risk of forced or child labour.
- 5.2 The risk of forced or child labour is likely not present in our business in areas for the following reasons:
 - (a) **Country Risk.** Goodwill operates solely in Canada and all suppliers are located within Canada. All Goodwill employees are located in Canada, which has robust labour and human rights legislation, including the Act.

- (b) **Sector or Industry Risk.** Although Goodwill's activities include the sale of garments, which has been identified by the Global Slavery Index as being high risk for forced labour, Goodwill sells only donated garments. Goodwill does not purchase any garments from garment producers or wholesalers.
- (c) **Business or Transaction Risk.** Although Goodwill has volunteers who provide services for no monetary compensation, Goodwill maintains strict compliance with all applicable human rights and labour legislation. Goodwill seeks legal counsel where necessary and holds itself to the highest moral standards with respect to its volunteers.
- (d) **Raw Materials Risk.** Goodwill does not use any raw materials in any of its activities.

5.3 Goodwill recognizes that its suppliers have employees and workers. Since Goodwill does not employ such workers, Goodwill has less control and visibility over their working conditions and employment terms, and Goodwill continues to tailor our risk management actions to address those risks. Goodwill will continue our efforts to classify our supplier risks to identify and prevent forced and child labour.

ARTICLE 6: ACTIONS TAKEN TO COMBAT THE RISK OF FORCED OR CHILD LABOUR:

- 6.1 Building on the policies and procedures Goodwill has put into place. Goodwill is developing strategies in order to:
- (a) assess and further its understanding in the areas of potential risk for forced and child labour in our business;
 - (b) monitor such potential risk areas; and
 - (c) reduce or mitigate such risks.
- 6.2 Goodwill additionally seeks to only do business with suppliers that have similar ethically business practices, including those related to human rights. Goodwill will not tolerate any form of forced or child labour within its supply chain. To manage such risk, Goodwill will continue to develop appropriate contractual obligations, including, but not limited to, compliance with Goodwill Code of Conduct and audit provisions.

ARTICLE 7: EMPLOYEE TRAINING

- 7.1 Goodwill is developing a mandatory management employee training program to make our employees aware, knowledgeable, and capable of reporting the risks of forced or child labour in our business.
- 7.2 Goodwill is developing employee onboarding materials to ready employees for the training program noted in Section 7.1.

ARTICLE 8: MEASURES TAKEN TO REMEDIATE:

- 8.1 As of the date of this statement, Goodwill has not identified any instances of forced or child labour in our business. Therefore, Goodwill has not been required to take remedial measures.

ARTICLE 9: ASSESSING EFFECTIVENESS

- 9.1 Goodwill has not taken any actions to assess the effectiveness of its actions in preventing and reducing risks of forced and child labour in our business. In the future, Goodwill will begin assessing the effectiveness of our actions by evaluating key performance indicators, namely the number of staff trained, the number of suppliers and contractors screened, the number of reported breaches, and the instances of remedial actions being taken.

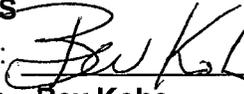
ARTICLE 10: APPROVAL OF THE STATEMENT

- 10.1 This statement is made in accordance with Section 11 of the Supply Chains Act and represents Goodwill's statement for the financial year ending on March 31, 2024.
- 10.2 Goodwill has acted in consultation with Siskinds LLP in preparing this statement.
- 10.3 This statement was approved by the Board of Directors of Goodwill pursuant to Paragraph 11(4)(a) of the Supply Chains Act on May 29th, 2024.
- 10.4 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.

[Signature page follows]

DATED 29th of May 2024

**GOODWILL INDUSTRIES ONTARIO GREAT
LAKES**

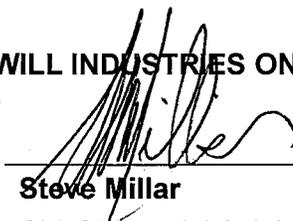
Per: 

Name: **Bev Kobe**

Title: President & CEO

I have the authority to bind the
corporation

**GOODWILL INDUSTRIES ONTARIO GREAT
LAKES**

Per: 

Name: **Steve Millar**

Title: Chief Financial & Administrative Officer

I have the authority to bind the
corporation