

MODERN SLAVERY STATEMENT



Updated: May 8, 2024

INTRODUCTION

This statement outlines the steps we have taken to prevent modern slavery within Great Canadian Railtour Company Ltd. (Rocky Mountaineer) and our supply chains, while also outlining our plans for future improvements.

Please contact compliance@rockymountaineer.com with comments, questions, or suggestions about this statement.

STATEMENT

Rocky Mountaineer condemns all forms of modern slavery, including but not limited to forced labour, child labour, sexual exploitation, and human trafficking. We do not tolerate modern slavery within our business or our supply chain. We work to uphold the highest standards of ethical conduct and corporate responsibility across all aspects of our business. These efforts extend to combating modern slavery and human trafficking in all its forms. We recognize the importance of respecting human rights and ensuring fair labour practices within our operations and throughout our supply chain.

STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

Rocky Mountaineer is a privately-owned luxury tourist train, operating in Western Canada and the Southwest United States. We operate train journeys in Western Canada and the Southwest US, which feature scenic landscapes, high-quality cuisine, commentary on the regions, and friendly service by our onboard hosts.

We employ approximately 350 year-round employees, located in Canada, the United States, the United Kingdom and Australia. During our travel operations season, from April to October annually, we hire an additional 600 seasonal employees who, primarily, work onboard the train and in our destinations. Our organizational structure comprises eight departments: operations; global sales; marketing and customer experience; communications and sustainability; revenue maximization; people and culture; information technology; and finance.

To ensure maintenance and safe operations of our trains, we source supplies, services, and specialty equipment from companies within Canada and we import specialty parts and equipment from countries outside of Canada, including Italy, Germany, Czechia, US, and the UK. As part of the onboard services we provide guests, we procure food and beverage products that are, in part, locally sourced to feature regional cuisine. We purchase linens, dishes, and other culinary supplies to maintain cleanliness and comfort for our employees and guests. We also procure catering, maintenance, security, and other hospitality services to support our operations.

RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

As a tourist train operating in Western Canada and Southwest United States, we recognize we may be indirectly linked to the risk of modern slavery, including:

- Vulnerability in our supply chain: Risks may exist in regions with less stringent labour standards, which can be identified and addressed through our supply chain management efforts.
- Contract, subcontract or seasonal employees: These people may be more vulnerable to exploitation without adequate safeguards in place.

- Training and awareness: Our employees may not recognize potential risks without education and protocols.
- While we have not identified individuals or communities that may experience the loss of income due to modern slavery within our operations or supply chain, this is a risk we will continue to monitor.

We manage modern slavery risks through the policies, processes and practices outlined in this statement. Our supply chain encompasses a wide range of goods and services from both domestic and international suppliers. As part of our supply chain management practices, we are monitoring and evaluating suppliers to identify and address any potential risks to modern slavery.

POLICIES, PROCEDURES, AND DUE DILIGENCE

We continuously review and improve our policies, procedures, and practices to enhance our ability to prevent and detect modern slavery within our operations and supply chain. Our business, operations, and adherence to the codes of conduct below are governed by our Board of Directors.

Code of Conduct: At Rocky Mountaineer, our purpose is to be creators of life-changing experiences for our guests, partners, and each other. Our values are to be one team, achieve extraordinary outcomes, and create meaningful moments. Our purpose and values guide our employees. These are reflected in our Code of Conduct, which outlines expectations for how we operate. Our Code of Conduct, which all employees and contractors must adhere to, outlines our Modern Slavery Statement and efforts to combat modern slavery within our operations and supply chain. Any actual or possible violations of our Code of Conduct are required to be reported to ensure they are reviewed, and appropriate actions are taken.

Supplier Code of Conduct: We are in the process of evaluating our vendors to identify any high-risk suppliers with regard to modern slavery in our supply chain. We are introducing due diligence assessments of our suppliers to evaluate their compliance with modern slavery regulations. These assessments will include evaluating their policies, procedures, and practices related to labour rights and working conditions. Our Supplier Code of Conduct requires suppliers to have policies and procedures in place to prevent modern slavery, and to quickly resolve any issues identified.

Employee empowerment and training

We provide guidelines to all employees to increase awareness about modern slavery, how to identify potential risks, and where to send questions or report concerns. We nurture a culture of continuous improvement and learning within the business, where employees are empowered to contribute ideas and innovations for addressing modern slavery risks. We will continue to improve our training and employee engagement practices to reflect best practices and regulatory requirements.

Reporting

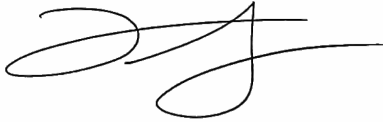
Rocky Mountaineer condemns all forms of modern slavery and we do not tolerate it within our business or our supply chain. We maintain a confidential whistleblower mechanism that enables employees to report any suspicions or concerns related to modern slavery. All reports are investigated to ensure appropriate actions are taken to address any violations.

We will publish this Modern Slavery Statement on our website, annually, to detail the actions we have taken to address modern slavery and our plans for future improvements.

ATTESTATION

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.

Signed by

A handwritten signature in black ink, appearing to be 'Tristan Armstrong', written in a cursive style.

Tristan Armstrong
Chief Executive Officer
Rocky Mountaineer
May 8, 2024

This Modern Slavery Statement reflects the financial year, which ended on December 31, 2023.