

Statement wording

Introduction

This statement sets out MacLeod Group Health Services Limited actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending December 31, 2023.

As part of the Health Industry, the organization recognizes that it has a responsibility to take a robust approach to slavery and human trafficking.

The organization is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organizational structure, activities and supply chains

MacLeod Group Health Services Limited is a trusted name in retirement living and nursing care. An incorporated company located in Nova Scotia, Canada, we directly employ our approximate 850 employees, and we follow Canadian employment law. MacLeod Group Health Services Limited will seek to raise staff awareness relating to this subject matter.

MacLeod Group Health Services Limited supply chain includes a wide range of suppliers and vendors who provide support for our residents. MacLeod Group Health Services Limited's suppliers include direct and indirect suppliers and vendors, both in Canada and outside Canada. MacLeod Group Health Services Limited will endeavour to have policies and procedures in place for our vendors and suppliers.

Policies and Due Diligence Processes

a. **Policies:** The organization operates the following policies:

- **Complaint policy** - The organization encourages all its workers, customers and other business partners to report any concerns that alleges wrongdoing or operational inefficiency by the home.
- **Code of conduct policy** - The organization's code makes clear the desire to protect all of our residents, employees, vendors, and the organization itself from any illegal or damaging actions committed by individuals either knowingly or unknowingly.
- **Formal investigations** – in the event of a breach in policies or additional investigation is required; the organization has a process in place for this.

MacLeod Group Health Services Limited will continue to look to identify modern slavery risks and steps in an effort to prevent slavery and human trafficking in its operations.

b. **Due diligence processes:** Although the organization did not have supply chain due diligence in place during the existing fiscal year, it is aware of the importance of supply chain due diligence and is committed to exploring, and requiring, additional due diligence procedures when considering taking on new suppliers, and regularly reviewing its existing suppliers.

Risk Assessment

The organization has not yet assessed parts of the business and supply chain that carry a risk of forced or child labour, but is committed to doing so in the upcoming year. A risk-based approach will take into account the following factors:

- Geographical location of the supplier.
- Extraction of raw materials.
- Ingredients used in food products.
- Goods and materials sourced.
- Delivery of items in supply chain.

Remediation Measures Against Forced Labour or Child Labour

During the year ended December 31, 2023, the organization did not identify any instances of forced or child labour within the organization or its supply chains.

Remediation measures Against Loss of Income to Vulnerable Families

During the year ended December 31, 2023, the organization did not identify any instances of forced or child labour within the organization or its supply chains.

Employment Training

MacLeod Group Health Services Limited will ensure proper staff training and education modules are developed within the organization on modern slavery in the upcoming year. It is our intention to make training mandatory for all within the organization as required covering the following areas:

- our business's purchasing practices, which influence supply chain conditions;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organization;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organization should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organization's supply chains.

Entity Assessment

Although the entity did not have an existing process in place for assessing the effectiveness of forced labour and child labour not being used in its business and supply chains, MacLeod Group Health Services will look to assess our effectiveness in preventing and reducing risks of forced labour and child labour as policies, training and education are established.

Approval

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.

A handwritten signature in blue ink, appearing to read 'Ramsay Duff', written over a horizontal line.

Ramsay Duff
Chief Executive Officer

May 28, 2024

I have the authority to bind MacLeod Group Health Services Limited