



Pattison Media

Modern Slavery Report 2023

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2023 to December 31, 2023 and has been prepared in compliance with Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (Canada) (the “Act”).

This initial Report is made on behalf of **Pattison Media Ltd. (“PML”)** and is not a joint report.

I. INTRODUCTION

Forced or child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the media industry, PML recognizes the important role that we have in ensuring that the supply chains that support our operations and products adhere to the highest ethical standards, including the prevention and identification of forced or child labour in our supply chain.

II. CORPORATE OVERVIEW AND SUPPLY CHAINS

PML is a division of the Jim Pattison group of companies. PML is operated by an executive team including the President, Director of Metro Sales, Director of Non-Metro Sales, Director of Finance, Director of Programming, Director of Technical Services, Director of Digital as well as eleven General Managers. General Managers are responsible for the operations of the individual locations. The executive team provides the framework to operate their locations.

PML is incorporated under the *Canada Business Corporations Act*. Headquartered in Kamloops, BC, PML operates in both the traditional and digital media landscape. With 51 radio stations, three television stations, over 20 digital news portals along with a podcasting division and two digital marketing sales and design divisions, PML is one of the largest western Canadian based media companies. The registered head office of PML is 460 Pemberton Terrace, Kamloops, BC, V2C1T5.

PML employs over 600 employees in the four western provinces. It strives to create a diverse and inclusive culture everywhere it operates. PML's radio content is almost exclusively produced in Canada, with a limited amount of syndicated programming produced by global media companies in the US. PML's radio products are sold through various offices of PML or by Canadian broadcast sales in Toronto.

PML's television content is primarily supplied by City TV, owned by Rogers Media Inc., which includes content licenced from the major US networks.

PML seeks long-term relationships with direct and indirect suppliers for the delivery of services, major systems and components to produce and deliver our programming and advertising content. Within its supply chain, PML has built relationships with suppliers in Canada and the US in production and indirect goods and services. PML currently does business with approximately 1,200 – 1,500 service and product suppliers located almost exclusively in Canada and the US.

Our key suppliers are long term stable partners in the areas of broadcast and telecommunications network equipment; information technology hardware, software and services; construction and maintenance services; and general business consultancy services.

PML's supply chain includes the procurement of:

- Goods needed for everyday operations, including office supplies;
- Services needed for everyday operations, including professional services such as legal, and non-professional services such as IT, telecommunications, freight and cleaning;
- Goods and services needed to produce, transmit and promote audio visual content, including equipment, digital technology, transmission services, advertising services and merchandise;

- Production services from external production companies and pre-produced content (and rights) from studios; and
- Goods and services needed to produce and deliver advertising campaigns and sponsored events.

PML's total procurement spend for the previous two financial years totaled 15.6 million in 2023 and \$14.8 million in 2022.

III. POLICIES AND DUE DILIGENCE PROCESSES

Corporate Ethics Policy (May 2004)

PML's Corporate Ethics Policy expects all operations to comply with lawfully instituted municipal, provincial, and federal laws and regulations which affect our operation.

We also expect our employees to comply with these laws and regulations. We operate a company with a reputation of high moral standards and good character, and we expect our employees to reflect this intent in their conduct. Employees are responsible for behaving in a highly ethical manner as they conduct business. Employees must not knowingly help another person conduct business unethically.

Whistle Blower Policy (February 2013)

PML's Whistleblower Policy and Workplace Concerns Policy provide a mechanism for employees to report concerns regarding wrongdoing without fear of victimization, subsequent discrimination, or disadvantage. The policy is intended to encourage and enable employees to raise concerns within PML rather than overlooking a problem or seeking a resolution outside the organization. The policy applies to all employees and contractors working for PML. It is also intended to provide a method for other stakeholders (suppliers, customers, shareholders, etc.) to voice their concerns regarding PML's business conduct.

Equality, Diversity, and Inclusion Policy (February 2021)

PML embraces an environment where equity, diversity and inclusion are cultural norms and where all individuals, regardless of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status or disability, are respected and valued.

We believe our core values, purpose and aspiration are all strengthened when all members have a voice and are encouraged to contribute to a supportive space. Therefore, we take a collective responsibility to create an environment where everyone feels included, respected, and comfortable to bring their whole self to work. It is the collective responsibility of PML leadership, management, and staff to ensure we operate with good intent and practice.

As part of our Policy Statement, we confirm the following:

Valuing and managing diversity means that Pattison Media will:

- *Help to build a safe work environment by taking action against inappropriate workplace and business behaviour that does not value diversity including discrimination, harassment, bullying, victimisation and vilification.*

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the highest importance on respecting human rights while conducting our business activities everywhere we operate. We expect the same of our business partners.

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

To mitigate potential forced labour and child labour risk, we follow a due diligence approach that includes the following steps:

- Conducting a preliminary internal assessment of the risks of forced labour and/or child labour in our supply chains to enhance our supplier third-party due diligence process;
- Supplier visits;
- Supplier confirmation, including appropriate language on this issue representing and warranting that no such practices are involved or incorporated in their systems/work; and
- Embedding responsible business conduct into policies and management systems.

IV. RISK ASSESSMENT AND MANAGEMENT

Most of the PML supply chain operates in the US and Canada where the risk of forced labour and child labour is low. Nevertheless, we are potentially exposed to this risk when we source goods (directly or indirectly) from countries with a higher risk of forced labour and child labour. PML refuses to knowingly partner with any supplier that engages in forced labour and child labour, however it is possible this risk remains, especially for indirect suppliers.

Based on a comprehensive assessment of our supply chain, we have identified the highest modern slavery risks for each of our spend categories in our supply chain as follows:

Production & Broadcasting

Exploitation in media production, particularly in underpaid labour in entertainment and content creation.

Information Technology Equipment & Services

Hardware and software components can be produced by vulnerable, low skilled and low wage labour in high-risk countries.

Infrastructure

Exploitation of low skilled migrant workers for construction and maintenance projects.

Marketing and Communications

Marketing and promotional items can be manufactured in high-risk countries or developing economies by low wage or child labour.

Office Supplies

Consumables can be manufactured in high-risk countries or developing economies by low wage or child labour.

Consultants & Contractors

Risks may involve exploitation of workers in consulting and contracting services, especially in global supply chains.

Program Rights & Royalties

Concerns may arise in the content creation industry regarding royalties, particularly in lower-wage regions.

Property Services

Exploitation of low skilled migrant workers.

Travel & Fleet

Potential issues can include exploitation in transportation services or fleet maintenance.

V. MODERN SLAVERY REMEDIATION MEASURES

If through our risk assessment and vendor inquiry we find any unethical business practices or use of forced or child labour, we insist the entity take all reasonable action to address or remove these practices, including where relevant addressing any practices of other entities in its supply chains. If they are unable to remediate the practices, we make a business decision on the continuation of the relationship.

No instances of forced labour and child labour were identified in PML's business activities in 2023.

VI. LOSS OF INCOME – REMEDIATION MEASURES

There are currently no measures in place to remediate any forced or child labour in our supply chain. As of the writing of this Report we have no knowledge of forced or child labour being used in our supply chain, but we are committed to the addition of processes to help identify these instances and support the development of an appropriate remediation approach.

VII. TRAINING

PML's employees receive regular training on ethical topics and our policies. All new office employees are assigned a mandatory onboarding training package which includes training on our Code of Ethics. On an annual basis, all employees are required to certify their abidance by our company policies.

In 2023, we did not have specific, formalized training in place to understand and mitigate the risk of forced labour or child labour.

VIII. ASSESSING EFFECTIVENESS

PML has in place a number of measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. However, we have not taken or planned any activities to assess the effectiveness of our policies, processes, and practices.

IX. APPROVAL AND ATTESTATION

This Report was approved pursuant to paragraph 4(a) of the Act by PML's President Rod Schween on May 31, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at www.pattisonmedia.com.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for PML. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Rod Schween on behalf of Pattison Media Ltd.

President, May 31, 2024

I have the authority to bind PML