



May 10th, 2024

## **Modern Slavery Act Report (Fiscal Year 2024)**

### **1. Introduction**

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a joint report for: Prairie Communications Ltd., WCI Whyte Communications Inc. and 596266 Saskatchewan Ltd. (collectively “PMC”) which are all active entities in the Prairie Mobile group of companies. This report refers to the fiscal year ending March 31, 2024.

PMC is committed to sourcing products and providing services of the highest quality in a way that is socially responsible. We recognize human rights standards in addition to complying with laws and regulations.

PMC does not manufacture goods, nor do we export goods or services outside of Canada. As a wholesale and retail operator across five provinces in Canada, PMC works with our vendors to ensure they respect internationally recognized standards in addition to complying with the laws and regulations of their home country as well as countries and regions where they conduct business.

Pre-existing measures have been in place for the majority of our vendors, who are internationally recognized companies with excellent reputations. These measures include well-documented controls and grievance mechanisms.

### **2. Due Diligence**

We undertook a review of our existing processes to manage forced labour and child labour risks in our internal operations and then identified any gaps against the requirements of the Act and international human rights leading practice.

#### **Internal Processes-Human Resources**

No gaps or risks were found in PMC’s hiring practices or human resource processes. All employees in our branches across Canada go through the same high-quality recruitment processes (voluntary and equitable application process, reference checks and third-party credit & background checks,) and all are managed through our “Hire, Train, Treat them Right” policies and procedures, including quarterly performance updates.

Our brand statement, “We hear you” is our commitment to creating a culture where every voice matters and people feel valued. Feedback mechanisms are in place with front line staff and management teams as well as annual Connection Sessions where all staff can interact directly with the executive leadership team.

We maintain internal controls to ensure that all workers are legally entitled to work in Canada; are fairly compensated; comply with local labour standards (including minimum age and hours of work); and meet all health and safety requirements and laws. We are in the process of implementing a new Human Resource Information System (HRIS) which will assist in reporting compliance on worker recruitment and labour standards.

## Internal Processes-Procurement

Our supplier relationships span multiple decades, some since we began operations in 1968. We are in the process of creating a due diligence checklist for new suppliers or contractors to ensure compliance with the Act before any business is transacted.

In addition to the checklist, if the company does not have a public statement on the Act, we have developed a Supplier Certification document that must be signed by an authorized signing officer of the company. This document acknowledges that no forced or child labour is used by them or within their supply chain.

### 3. Supply Chain Risk

We have worked with our business partner's (supply chain) to understand their processes of managing forced labour and child labour risks and sought to identify any gaps against the requirements of the Act and international human rights leading practice.

This began with a risk analysis identifying major suppliers. Our focus for this first reporting year was on suppliers that represented more than eighty percent of annual purchases.

All of the vendors identified operate in markets with existing legislative requirements, therefore they have plans and processes in place for compliance with Bill S211. These vendors comply with The United Kingdom's *Modern Slavery Act 2015*, Australia's *Modern Slavery Act 2018* as well as California's *Transparency in Supply Chains Act*. Supply chain mapping, which is undertaken by our vendors, is included in their Modern Slavery statements.

The PMC leadership team is satisfied with the diligence shown by these suppliers with respect to the potential use of forced labour or child labour in any step of the production of goods we import into Canada.

In the event we engage a contractor for services, we will require either their statement on modern slavery or their acknowledgement of compliance via our supplier certification form. Our contractors are typically local businesses with connections in the community and long-standing relationships. In addition, they can provide Work Safe clearance certificates upon request.

### 4. Remediation and Reporting

To date, there have been no reported instances of forced or child labor nor any reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate forced or child labour.

Should any instances of forced or child labour be detected within our supply chain, we commit to transparently reporting such incidents to relevant authorities & stakeholders and to work with our suppliers to ensure corrective measures are implemented.

### 5. Training

Our human resources team have undergone extensive training in human rights and labour laws to ensure we remain in compliance. We are committed to incorporate training on the Act into our onboarding process for new hires. This will include sessions for all existing employees across all branches.

We will outline our policies and due diligence practices to address modern slavery, in addition to promoting awareness of our obligations under legislation what to do if they become aware of any breaches or have concerns. This will be developed and implemented over the next fiscal year.

### 6. Ensuring compliance

During annual vendor review meetings, we will incorporate a discussion of the Act, compliance and a risk assessment.

Internally, we will develop a compliance monitoring/reporting system for our supply chain as well as our internal labour practices.

## Attestation

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in this report. Based on my knowledge and having exercised reasonable due 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.



Kimberley Bishop, President

May 10th, 2024