

**REPORT ON MODERN SLAVERY**

**FOR THE YEAR ENDED DECEMBER 31, 2023**

**RENTOKIL CANADA CORPORATION**

**Approved by the Board of Directors on May 30, 2024**

**Rentokil Canada Corporation  
600 – 1741 Lower Water Street  
Halifax, Nova Scotia B3J 0J2**

## 1. Introduction

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires that certain entities report on the measures they have taken during the fiscal year to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains. This Report on Modern Slavery (the “**Report**”) is being prepared and filed by Rentokil Canada Corporation (the “**Corporation**”) in compliance with its reporting requirements under the Act. This Report refers to the 2023 fiscal year (i.e. January 1, 2023 to December 31, 2023) (the “**Reporting Period**”) and describes measures taken by the Corporation during the Reporting Period.

The Corporation does not tolerate child labour, forced labour or any other form of modern slavery and strives to maintain the highest standards of ethical behaviour and governance compliance. The Corporation recognizes its responsibility to manage its business and supply chains to identify and alleviate any potential or actual human rights violations, including modern slavery. The Corporation is committed to working with its suppliers to address potential areas of risk and to work together to mitigate any areas of concern.

## 2. Steps taken to prevent and reduce the risk of forced labour or child labour

The Corporation considers the respect of human rights to be a fundamental corporate responsibility and a value governing all of its activities. The Corporation will under no circumstances make use of forced labour or child labour and will only employ individuals who are working of their own free will.

During the Reporting Period, the Corporation took the following steps to prevent and reduce the risk that forced labour or child labour was used in its business and supply chains:

- **Continued commitment to upholding and respecting human rights:** The Corporation’s ultimate parent company, Rentokil Initial plc (the “**Parent**”), has developed several policies and procedures which govern the business and affairs of the Parent and its subsidiaries, including the Corporation (collectively, the “**RI Organization**”). These policies include the Code of Conduct, the Supplier Code – 2<sup>nd</sup> Edition (the “**Supplier Code**”), the Dignity at Work & Human Rights Policy (the “**Human Rights Policy**”), the RI Supplier Management Standard (the “**Supplier Standard**”) and the global “Speak Up” whistleblower policy (the “**Speak Up Policy**”). The Corporation continues to uphold, enforce and promote these policies, which emphasize a commitment to ethical standards and legal compliance.
- **Careful selection of suppliers:** All suppliers to the RI Organization must comply with required standards developed by the Parent. The RI Organization does not source goods from suppliers that do not conform to the required standards during the pre-selection evaluation and will terminate contracts when existing suppliers refuse necessary corrective action.
- **Human rights and modern slavery training initiatives:** During the Reporting Period, the Parent offered modern slavery training and awareness programs to the Corporation’s employees. The Parent also offers modern slavery training and awareness programs to suppliers that provide goods to the RI Organization.

More details on the above actions are set out in this Report.

### **3. Corporate structure, activities and supply chains**

The Corporation is incorporated under the Nova Scotia *Companies Act*. The Corporation is a privately-held company and has no subsidiaries. The Corporation is the Canadian subsidiary of the ultimate Parent, whose common shares are listed for trading on the London Stock Exchange. The Parent is based in Crawley, England and is a global leader in the provision of route-based services which protect people and enhance lives. The RI Organization operates in 90 countries and employed approximately 62,900 employees during the Reporting Period.

Headquartered in Halifax, Nova Scotia, the Corporation is one of Canada's leading pest control companies and a leading provider of pest control services. The Corporation has been providing pest control services in Canada since 1987. The Corporation is focused on high-quality, reliable services and has earned a reputation in Canada for full-service pest solutions delivered through cutting-edge technology and uncompromising quality. As of December 31, 2023, the Corporation had approximately 911 employees.

The Corporation provides a comprehensive range of pest control services, specializing in both commercial and residential sectors. The Corporation's services consist of pest control, digital pest control and odour management services. The Corporation employs environmentally and economically sensible pest management services, ensuring minimal creation of waste and the management of unavoidable waste in an environmentally considerate manner whenever possible.

The Corporation sells and distributes certain goods, which consist of, but are not limited to, products for pest management and DIY garden pest products. However, the majority of the revenues earned by the Corporation come from pest control-related services carried out by employees of the Corporation. The products used in the performance of these services are an essential but relatively minor component of the operation, making up between 5% and 15% of the service cost, depending on the business category. These products include rodenticides, insect control equipment and other products used to control the multiple varieties of pests encountered. These products are sourced by the Parent's procurement and supply chain teams from international suppliers who are audited both before being commissioned and regularly thereafter on a risk-based frequency. More information regarding the RI Organization's suppliers can be found in the Parent's Modern Slavery Statement 2023 (the "**Parent's Modern Slavery Statement**"), which is available on the Parent's website at [www.rentokil-initial.com](http://www.rentokil-initial.com).

As indicated above, the Parent has developed and implemented the Supplier Code which outlines the standards and controls that are expected from all suppliers of goods and services to the RI Organization. All major contracts and agreements for the supply of goods and services by both individuals and companies include a clause requiring compliance with the Supplier Code in addition to the specific clauses that relate to bribery, corruption and modern slavery.

### **4. Policies and due diligence processes in relation to forced labour and child labour**

Through the Parent, the Corporation has policies and due diligence processes in place that address modern slavery concerns and outline the principles of conduct and ethics to be followed by the Corporation.

## Policies

As indicated above, the Parent has developed several policies and procedures which govern the business and affairs of the entire RI Organization, including the Corporation. These policies include the Code of Conduct, the Supplier Code, the Human Rights Policy, the Supplier Standard and the Speak Up Policy (each of which is available on the Parent's website at [www.rentokil-initial.com](http://www.rentokil-initial.com)). Brief summaries of these policies are provided below:

- **Code of Conduct:** Outlines the commitment of the entire RI Organization (including the Corporation) to achieving and maintaining the highest levels of professional behaviour, standards and conduct in all of its business and affairs. The Code of Conduct is a fundamental commitment to comply with all applicable legal requirements and with high ethical standards. The Human Rights section of the Code of Conduct states that the RI Organization will under no circumstances make use of forced or coerced labour, servitude or slavery and will only employ individuals who are working of their own free will.
- **Supplier Code:** Outlines the standards and controls that are expected from all suppliers of goods and services to the RI Organization, including the Corporation. The RI Organization has a zero-tolerance approach to its suppliers relying upon the use of forced or child labour in connection with the provision of services or products to the RI Organization, including the Corporation. All major contracts and agreements for the supply of goods and services by both individuals and companies include a clause requiring compliance with the Supplier Code in addition to the specific clauses that relate to bribery, corruption and modern slavery. Awareness of the Supplier Code is checked during supplier audits.
- **Human Rights Policy:** Outlines the commitment of the RI Organization (including the Corporation) to ensuring dignity at work and upholding the human rights of all colleagues, customers, suppliers and everyone the RI Organization engages with in its business and affairs.
- **Supplier Standard:** Outlines the standards expected of suppliers of goods or services to the RI Organization, including the Corporation. All critical suppliers of the RI Organization are audited on a prescribed frequency. These audits are conducted against the Supplier Standard, which was updated in 2023 to include more specific details on Environmental, Social and Governance factors.
- **Speak Up Policy:** The RI Organization operates a global 'Speak Up' or whistleblowing policy. The Speak Up Policy is designed to allow employees across the RI Organization to raise concerns internally to the Internal Audit team and to disclose information which the individual believes highlights or would indicate illegality, unethical behaviour or other serious malpractice, including any instances or suspicions of modern slavery. A separate "Supplier Speak Up" line is available for suppliers and their employees or other stakeholders to report genuine concerns over malpractice, illegal acts or failures to comply with recognized standards of ethical behaviour that they observe at any point within the RI Organization's global supply chain.

## Due Diligence Processes

The RI Organization abides by robust policies and due diligence processes to address forced labour and child labour concerns. As mandated in the Supplier Code, the RI Organization has a zero-tolerance approach

to its suppliers relying upon the use of forced or child labour in connection with the provision of services or products to the RI Organization, including the Corporation. Pursuant to the Supplier Code, all suppliers to the RI Organization (including suppliers to the Corporation) must comply with certain requirements relating to human rights and anti-slavery. Among other things, the Supplier Code outlines that all suppliers will: (i) not use child labour; (ii) comply with all applicable labour laws and best practices in their industry; (iii) implement policies and procedures to ensure that they, their staff, their suppliers and subcontractors comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force; (iv) only employ individuals who are working of their own free will; (v) report any actual or suspected slavery or human trafficking in a supply chain which has a connection to the work they carry out for the RI Organization; (vi) maintain a complete set of records tracing the supply chain of all goods and services provided to the RI Organization; and (vii) implement ongoing due diligence procedures for their subcontractors and suppliers to ensure that there is no slavery or human trafficking in their supply chain.

In all sourcing decisions, compliance with the RI Organization's standards for a responsible and sustainable business approach is used as a go/no-go gate rather than as a weighting factor for decision making. Suppliers that do not conform to required standards during the pre-selection evaluation are eliminated from the tender process. If an area of non-compliance is discovered at a new or existing supplier, they are given the opportunity to address and resolve the issue, with the RI Organization's support where required. It is important that suppliers are made aware of the specific issue and the actions considered necessary to remedy the situation. The ultimate sanction of terminating a contract is implemented when the supplier refuses to work with the RI Organization to implement the required action, which has only been used twice in the last seven years.

## **5. Areas of risk and steps taken to manage risk**

During the Reporting Period, the Parent worked to identify and address risks within the RI Organization's activities and supply chains (including the activities and supply chains of the Corporation) and will continue to strive to identify and address emerging risks. The Parent has accomplished this by (among other things): (i) conducting an internal assessment of risks of forced labour and child labour in its activities and supply chains; (ii) developing and implementing grievance mechanisms; (iii) continuing to monitor its own operating procedures; (iv) auditing suppliers; (v) continuing to monitor its suppliers; (vi) developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and child labour in the RI Organization's activities and supply chains; (vii) developing and implementing anti-forced labour and child labour contractual clauses; (viii) developing and implementing anti-forced labour and child labour standards, codes of conduct and compliance checklists; (ix) developing and implementing training and awareness materials on forced labour and child labour; and (x) requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and child labour in their activities and supply chains.

For the Reporting Period, the Parent's Group Risk Committee concluded that the risk of modern slavery occurring in the RI Organization's immediate lines-of-business remains low. However, there is always a risk of modern slavery occurring in areas of the RI Organization's operation using second-tier suppliers, where there is less visibility of their standards and values. The risk of modern slavery in the RI Organization's extended supply chains is assessed using data from the International Labour Organization, Walk Free and the International Organization for Migration as presented in Walk Free's flagship report, the Global Slavery Index (GSI) 2023. More information regarding the Parent's assessment of risks in the RI

Organization's supply chains, and how these risks have been addressed, can be found in the Parent's Modern Slavery Statement, which is available on the Parent's website at [www.rentokil-initial.com](http://www.rentokil-initial.com).

The Corporation recognizes that risks relating to modern slavery are complex and evolving, and the Corporation is committed to continuing to work on identifying and addressing any such risks in its business.

#### **6. Measures taken to remediate any forced labour or child labour**

During the Reporting Period, the Corporation did not identify any instances of forced labour or child labour in its activities and supply chains, nor were any such instances of forced labour or child labour reported to the Corporation. As a result, the Corporation did not take any measures to remediate any forced labour or child labour during the Reporting Period.

#### **7. Measures taken to remediate the loss of income**

The Corporation acknowledges that efforts to prevent and reduce the risk of forced labour and child labour may lead to a loss of income for vulnerable families. However, during the Reporting Period, there were no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in the Corporation's activities and supply chains. As a result, the Corporation did not take any measures to remediate any loss of income to vulnerable families during the Reporting Period.

#### **8. Training provided to employees on forced labour and child labour**

During the Reporting Period, the Parent offered modern slavery training and awareness programs to the Corporation's employees. These programs are designed to educate employees on forced labour and child labour. The Parent also offers modern slavery training and awareness programs to suppliers that provide goods to the RI Organization. The modern slavery training and awareness programs offered to the Corporation's employees are optional online classes which have been developed by both external organizations and the Parent.

One online training module offered to the Corporation's employees is entitled "Modern Slavery Awareness" which was developed to raise awareness of modern slavery through the RI Organization's supply chain. Upon completion of this program, employees should be able to: (i) explain what modern slavery is; (ii) recall the Parent's Modern Slavery Statement and Code of Conduct requirements; (iii) identify certain behaviours that hint at a person being a victim of slavery; (iv) explain what the RI Organization has already done to ensure that it does not take part in slavery; and (v) explain what to do when you suspect someone of being a victim of slavery. This particular program is offered to all employees of the Corporation, takes about thirty minutes to complete and concludes with a quiz. As per the Supplier Code, the RI Organization also offers and encourages its suppliers to participate in this online training module which is offered free of charge to all suppliers.

In addition to the above training, the Parent has also developed a number of policies to ensure a high standard of social, governance and ethical compliance (the policies are explained in greater detail above). All policies of the RI Organization are available internally on the RI Organization's intranet, with key policies available on the Parent's website at [www.rentokil-initial.com](http://www.rentokil-initial.com).

## 9. How we assess effectiveness

The Corporation does not tolerate child labour, forced labour or any other form of modern slavery, and is committed to supporting and respecting the protection of human rights in its business and supply chains. As of December 31, 2023, the Corporation itself has not taken any actions to assess the Corporation's effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains. However, the Parent does have policies and procedures in place which may be used to assess the RI Organization's effectiveness as a whole. These policies and procedures include the Code of Conduct, the Supplier Code, the Human Rights Policy, the Supplier Standard and the Speak Up Policy. As indicated in the Parent's Modern Slavery Statement, the RI Organization also regularly conducts audits of its suppliers. Audit procedures include site inspections, interviews with management and employees, and subsequent corrective action plans for suppliers. Suppliers audited receive a "Corrective Action Plan" within two days of their audit and must return an initial response within two weeks. Updates on actions are requested at appropriate times, and photographs are requested to demonstrate actions taken or revisits are carried out.

## 10. Approval and Attestation

**Pursuant to Section 11(4)(a) of the Act, this Report was approved by the Board of Directors of the Corporation on May 30, 2024.**

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 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.

Full name: Steven Tsambalieros

Title: President and Director

Date: May 30, 2024

(signed) "Steven Tsambalieros"  
I have the authority to bind Rentokil Canada Corporation