



Forced Labour and Child Labour Report

Introduction

This Forced Labour and Child Labour Report (this “**Report**”) for the financial year ending March 31, 2024 is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), also known as the Modern Slavery Act (the “**Act**”).

This Report is a single-entity report which applies to, and describes the reasonable steps taken by, Saskatchewan Association of Rehabilitation Centres (“**SARC**”) to mitigate forced labour and child labour in its operations and supply chains. SARC has 3 operating divisions including a recycling division, SARCAN Recycling Division, which under agreement with the Province of Saskatchewan operates a depot-based collection and recycling system. SARC’s other divisions include its Member Services Division and Finance Division.

Respect for Human Rights

SARC fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour in its operations and its supply chains. Respect for human rights is fundamental to SARC’s values, the long-term stability and growth of its business and to the wellbeing of the communities in which it operates.

As set out in the United Nations Guiding Principles on Business and Human Rights (“**UNGPs**”), business enterprises have a responsibility to respect internationally recognized human rights. The responsibility to respect human rights requires that business enterprises: (a) avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; and (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. In applying the lens of the UNGPs, SARC has assessed the potential for its operations to cause, contribute to, or be directly linked to adverse human rights impacts, including forced labour and child labour. For the reasons described in this Report, SARC remains of the view that there is low risk that its operations have caused or contributed to adverse human rights impacts. SARC has started to review its own policies and procedures to assess whether the operations of its suppliers who provide goods and services used in the production and distribution processes cause or contribute to adverse human rights impacts.

SARC and its facilities, offices and divisions, including the SARCAN Recycling Division facilities, are primarily located on the traditional territory of Cree, Saulteaux, Assiniboine, Anishinabek, Dene, and Dakota; lands that are now known as part of Treaties 2, 4, 6, and 10 and homeland of the Métis. SARC respects the sovereignty, lands, histories, languages, knowledge systems, and cultures of First Nations, Métis and Inuit nations.

Corporate Structure, Activities and Supply Chains [Section 11(3)(a) of the Act]

Corporate Structure

SARC was established in 1968. It is a non-profit corporation incorporated under *The Non-Profit Corporations Act* in Saskatchewan and is a registered charity under the *Income Tax Act*. SARC is an association of over 100 Community-Based Organizations (“CBOs”) with approximately 80 percent of its CBOs providing core, daily services to thousands of people experiencing disability across Saskatchewan so that they can live in, work in, and enjoy their communities. As a provincial association, SARC provides services to non-profit organizations to expand their potential and support the work they do in their communities. SARC has over 50 years of experience helping CBOs develop their own capacity. In the 2023 calendar year, SARC achieved and maintained its accreditation through Imagine Canada’s Standards Program. This rigorous standards program assesses a non-profit organization’s board governance, financial accountability and transparency, fundraising, human resources, and volunteer involvement, and verifies a non-profit organization’s excellence in governance and non-profit management.

SARC’s membership is comprised of 3 categories of Members: (i) Regular Members, which are non-profit corporations that provide services to adults experiencing intellectual or developmental disabilities and have a stake in the SARCAN Recycling Division; (ii) Associate Members, which are non-profit corporations that provide services to adults experiencing intellectual or developmental disabilities; and (iii) Affiliate Members, which are non-profit corporations with an expressed interest in SARC. Each SARC Member is an independent, non-profit organization, governed by its own board of directors. Each SARC Member is the direct and legal employer of its workforce and is responsible for all employer obligations.

Activities and Divisions

SARC is committed to respect for human rights, inclusion, and equal opportunity throughout the organization and upholds these foundational principles in its 3 operating divisions: (1) Member Services Division, (2) SARCAN Recycling Division, and (3) Finance Division.

(1) Member Services Division

SARC’s Member Services Division has primary responsibility for supporting CBOs in the areas of training, consulting, services, and leadership and for leading advocacy efforts aimed at enhancing the Disability Service Sector in the Province of Saskatchewan. SARC’s Member Services Division operates out of SARC’s Saskatoon administration office. SARC Members pay an annual membership and are entitled to certain voting, representation, notices and announcements, and services (including, for example, the ability for a SARC Member’s employees to participate in a group benefits plan or pension plans administered by SARC) as set out in SARC’s bylaws based on their membership class. All services provided to each SARC Member through the Member Services Division are provided upon request by the SARC Member.

(2) SARCAN Recycling Division

In May of 1988, SARC entered into its first contract with the Province of Saskatchewan to collect and recycle non-refillable beverage containers in Saskatchewan and established its recycling division, SARCAN.

Under contract with the Government of Saskatchewan, SARC operates its SARCAN Recycling Division, which consists of a network of 73 recycling depots located in 65 communities throughout the Province of Saskatchewan. SARCAN Recycling Division also operates 2 processing plants located in Saskatoon,

Saskatchewan and Regina, Saskatchewan, and central leadership of this division is provided through the Saskatoon administration office.

SARCAN Recycling Division directly operates 34 recycling depots and contracts with SARC Regular Members for the operation of the remaining 39 depots. Throughout SARCAN Recycling Division, approximately 900 permanent and casual employees provide recycling services to the people of Saskatchewan. SARC directly employs 459 individuals through the 34 SARCAN Recycling Division-operated depots, 2 processing plants, and its Saskatoon administration office. Employees working in any of SARC's 3 operating divisions (SARCAN Recycling Division, Member Services Division and Finance Division) are all employed within the Province of Saskatchewan. SARC has no employees located outside of the Province of Saskatchewan or outside of Canada. Each SARC Regular Member contracted for the operation of a depot is the direct and legal employer of the employees working at that depot, however they remain contractually bound under the terms of the SARC Member Centre SARCAN Recycling Agreement to adhere to all policies and procedures prescribed by SARC for operating a SARCAN Recycling Division depot. These include SARC's employment policies, guidelines for hours of operation, reporting requirements, standards of conduct, and safety policies and procedures.

Additionally, SARC expects its contracted SARC Regular Members to comply with all applicable laws and regulations, and compliance with applicable laws and regulations are specific covenants provided by SARC Regular Members under the SARC Member Centre SARCAN Recycling Agreement to operate a contracted SARCAN Recycling Division depot.

Aside from operating the deposit refund system for beverage containers sold in Saskatchewan, the network of SARCAN Recycling Division depots also serve as a collection and consolidation system for various household recyclable materials, including (i) used paint and cans, collected on behalf of Product Care who is responsible for recycling processes thereafter; (ii) end-of-useful-life electronics, collected on behalf of Electronic Products Recycling Association, who is responsible for recycling processes thereafter (iii) household batteries, collected on behalf of Call2Recycle Canada, Inc., who is responsible for recycling processes thereafter; and (iv) non-beverage household glass, which is collected and sold by SARCAN Recycling Division within Canada. The deposit-paid beverage materials, which are collected at the 73 SARCAN Recycling Division depots, are sent to the 2 processing plants located in Saskatoon and Regina where they are sorted, crushed, or broken, then consolidated and prepared for transport and sale within Canada and the United States.

While SARCAN Recycling Division depots collect a number of materials, their primary role is operating a deposit refund system for beverage containers by collecting and paying deposits to customers returning a beverage container that was sold in Saskatchewan and where the customer had paid a deposit at the time of purchase. Materials collected through the deposit refund system are outlined below:

Material	Volume Recycled for financial year ending March 31, 2024	Destination	Commonly Recycled Into/End Use
Aluminum	9,001,133 lbs. / 4,082,845 kg.	United States	Aluminum cans
Plastic	10,547,951 lbs. / 4,784,470 kg.	Canada	Clothing, furniture, carpet, recycled content for bottles
Beer Bottle	3,255,696 bottles	Canada	Refilled with beer

Coloured Glass*	6,304,411 lbs. / 2,859,632 kg.	Canada	Fiberglass
Clear Glass	11,021,791 lbs. / 4,999,400 kg.	Canada	Luminescent beads in highway road paint and aggregate blasting material
Aseptic*	838,614 lbs. / 380,388 kg.	United States	Fibre wallboard, fibre extraction
Tin	99,748 lbs. / 45,244 kg.	Canada	Rebar and pipe
Cartons (Polycoat)*	1,448,058 lbs. / 656,828 kg.	United States South Korea	Toilet paper, paper products
Cardboard (OCC)	566,995 lbs. / 257,184 kg.	United States	Corrugated Containers

* *These materials traditionally have a negative value, meaning SARCAN Recycling Division pays downstream recyclers to accept these “hard-to-recycle, low value” products.*

During SARC’s 2024 financial year, Saskatchewan citizens made over 1.6 million visits to SARCAN Recycling Division depots to recycle their beverage containers, paint, electronics, household batteries and glass. SARCAN Recycling Division does not have access to any information related to the original point of customer purchase or country of origin of products recycled.

(3) Finance Division

SARC’s Finance Division provides day-to-day financial information and accounting services that support the work of the SARCAN Recycling Division and Member Services Division. Employees of the Finance Division work in SARC’s administration office in Saskatoon.

Supply Chains

SARC acknowledges the risk of forced labour and child labour existing in any complex supply chain. SARC recognizes that the level of risk for forced labour and child labour within its supply chain is dependent on 4 factors:

1. Vulnerable populations
2. Business models structured around high-risk work practices
3. High-risk products and services categories
4. High-risk geographies

The scope, nature, and categories of SARC’s business, activities, and procurement of goods and services generally limits exposure to modern slavery risks in its supply chain. The suppliers of goods which SARC imports are primarily located in Canada and the United States, and SARC acknowledges that these suppliers may have their own supply chains in overseas locations.

Mandates and operational objectives of each of SARC’s 3 operating divisions are varied. While each division utilizes goods and services specific to its operations, SARC procures various goods and services to support all of its operations, and its specific supply chain profile remains largely the same year-over-year.

During its 2024 financial year, SARC procured \$17,977,562.93 in goods and services utilized throughout its operations and divisions from 795 different Canadian and United States-based third-party manufacturers and vendors. The majority of SARC’s procurement spend was spent on suppliers located within North America. SARC has limited information available to it regarding the operations and supply chain of its suppliers.

Below is a list of the types of goods and services procured by SARC, and the key forced labour and child labour risks identified that are likely to exist further down the supply chain in each of the main categories of goods and services procured by SARC:

Type of goods / services	Common Use in Operations	Generally known forced labour and child labour risks	Supply Chain
Office Equipment, Furniture, Supplies	Desks, chairs, kitchen appliances, paper, office supplies	Furniture - There are increased forced labour and child labour risks associated with producing and sourcing raw materials such as timber, bricks, PVC in flooring, fabrics, metals, and glass as well as risks in the manufacturing industry located in countries with a greater prevalence of, and vulnerability to, forced labour and child labour.	SARC purchases these goods and services through third party vendors located in Canada and the United States.
Technology and IT	Electronics, tablets, laptops, desktops, phones, printers Cloud-based services and software	Forced labour and the worst forms of child labour are present in the supply chains that provide IT companies with the necessary raw materials to produce electronic goods, and parts of those goods. The manufacture of electronics has been associated with labour exploitation, including child labour and forced labour.	SARC primarily purchases these goods and services through third party vendors located in Canada and the United States. SARC contracts with a company located in Ireland for its online learning management system.
Shipping and Transport	Mail, courier, and transport	The global shipping industry has been identified as being particularly susceptible to modern slavery, due to factors such as labour shortages and a higher prevalence of temporary labour use.	SARC contracts for shipping and transport services through third party vendors located in Canada and the United States.
Travel, Food Services, and Accommodation	Hotel accommodations and event space, catering, airlines	The hospitality and food services industry, irrespective of jurisdiction, has elevated risks driven by parallel factors described below in relation to the cleaning sector. Food Services - Food-related supply chains have a high risk of forced labour and child labour due to the reliance on ingredients sourced globally, often from countries with a higher prevalence of, and vulnerability to, forced labour and child labour. For example, coffee, tea, cocoa, rice, palm and derivative products and seafood are some of the many products linked to forced labour and child labour.	All travel related purchases for business purposes occur within Canada and the United States. Hospitality services, including catering, hotel stays, and event space are purchased within Canada and the United States.

Facilities Management	Equipment maintenance (e.g. furnace, cleaning, snow, and garbage removal)	<p>The cleaning industry is considered a higher risk industry for forced labour and debt bondage due to factors such as employers withholding wages, excessive working hours, complex and opaque subcontracting arrangements, and workers on temporary visas with limited bargaining power and awareness of their rights at work.</p> <p>Similar to the cleaning sector, the prevalence of subcontracting in the facilities maintenance industry can lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed due to a lack of transparency.</p>	SARC contracts for these services through third party vendors located in Canada.
Parts and Equipment	Forklifts, operational equipment, flatteners, compacting machines, trailers, and transport vehicles	The manufacturing of heavy equipment, if produced with components sourced from countries with a greater prevalence of, and vulnerability to, forced labour and child labour increases the risks associated with forced labour and child labour being used in the supply chains for these products.	SARC contracts for these services through third party vendors located in Canada and the United States.
Professional Services (e.g. Payroll, Legal, Audit and Financial)	Legal, payroll, audit, financial and banking, professional development, research	The prevalence of, and vulnerability to, forced labour and child labour being used in the supply chains for these products and services are considered low.	SARC contracts for these services through third party vendors located in Canada and the United States.
Advertising, Marketing	Public awareness campaigns, advertising, corporate-branded merchandise	Corporate Merchandise - Mass-produced items and garments, particularly if produced in countries with a greater prevalence of, and vulnerability to, forced labour and child labour have a higher risk of child labour and forced labour.	SARC contracts for these services through third party vendors located in Canada.

SARC’s suppliers which support its 3 operating divisions are primarily domiciled in Canada. While SARC is of the view that its supply chains and activities for the types of goods and services procured by SARC carry a low risk of the use of child labour and forced labour, SARC has a zero-tolerance policy in relation to any form of modern slavery. SARC prohibits its people from engaging in, suggesting, allowing or ignoring modern slavery, including forced labour, child labour, sexual exploitation or abuse and human trafficking, in the conduct of its business. This commitment is implemented through SARC’s Modern Slavery Policy and Code of Ethics Policy. SARC also strives to procure goods and services as local to Saskatchewan as possible for use in its operations.

Steps Taken During SARC’s 2024 Financial Year to Prevent and Reduce Risk of Forced Labour and Child Labour in its Supply Chains [Section 11(1) of the Act]

During the 2024 financial year, SARC mapped its activities and supply chains for its 3 operating divisions to understand the activities and suppliers that may carry the risk of forced labour and child labour being used. This involved undertaking an analysis of risks in SARC’s supply chains and activities associated with

vulnerable populations, SARC's workplace and operational practices, reliance or usage of SARC on high-risk products and services and categories of goods and identifying the geographical location of its suppliers.

SARC has also taken steps towards developing due diligence processes for identifying, addressing and prohibiting the use of forced labour and child labour in SARC's activities and supply chains. These processes and steps involved:

- a) Introducing and approving the Modern Slavery Policy. In February 2024, as detailed below, SARC's Board of Directors approved the implementation of a Modern Slavery Policy which applies to all SARC employees, officers, directors, volunteers and agents, and to SARC's external consultants, third-party representatives, contractors and business partners, to target forced labour and child labour risks in SARC's supply chains and activities
- b) Increasing the awareness of SARC's Board of Directors and Administration Team regarding modern slavery and forced labour. This process was started in February 2024, through training sessions and presentations delivered by SARC's external legal advisors and members of the SARC executive, and is currently ongoing
- c) Initiating the review of SARC's procurement processes, which started in February 2024 and is currently ongoing. SARC expects to comment on any due diligence policies and processes arising from this process in next year's report
- d) Starting the review of its contracts with its SARC Regular Members contracted to operate SARCAN Recycling Division depots and with its suppliers for opportunities to address forced labour and child labour risks in their terms and conditions. This work was initiated towards the end of the financial year in March 2024 and is underway. SARC expects to comment on any due diligence policies and processes, and any changes to contractual language and the obligations imposed on its SARCAN Recycling Division depots and suppliers, arising from this process in next year's report
- e) Starting the review of SARC's Human Resources practices. This work was initiated towards the end of the financial year in March 2024 and is underway. SARC expects to comment on any due diligence policies and processes arising from this process in next year's report; and
- f) Beginning to research and explore available training and awareness programs that could be implemented throughout the organization to educate on the risks of forced labour and child labour. This work was initiated towards the end of the financial year in March 2024 and is underway. SARC expects to comment on any due diligence policies and processes arising from this process in next year's report.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour [Section 11(3)(b) of the Act]

SARC has certain internal policies and processes in place to promote and ensure compliance with applicable laws (including in respect of employment and human rights, forced labour and child labour) in Saskatchewan where SARC has operations. These policies include: Complaints Policy for handling internal and external complaints received about SARC; a Code of Ethics Policy and Conflict of Interest Policy, which both govern the conduct of employees of SARC and the members of SARC's Board of Directors; and Health and Safety, Discipline, Risk Management, Workplace Accommodation, Whistleblower, Violence and Abusive Behavior, and Diversity, Equity and Inclusion policies.

Employment Policies and Standards

SARC maintains an employee compensation program that supports the organization's mission and values and is designed to attract, motivate, retain, and reward talented and high performing employees who drive the organization's success and work to achieve organizational goals. SARC's compensation program is designed to support, reinforce, and align its values, business strategy, operational and financial needs with

a goal of growth and sustainability of the organization. SARC views compensation comprehensively as including not only wages, but retirement savings and health and other benefits. In determining compensation to be paid to its employees, SARC considers factors such as external equity, internal equity, and affordability to ensure a fair and equitable pay structure is established.

SARC has established a wage grid, which reflects fair, reasonable, and equitable compensation for the effort and work achieved by its employees. Compensation is reviewed annually by the SARC Board of Directors, and adjustments to compensation consider several factors, including but not limited to economic indicators such as the Consumer Price Index and/or Canadian wage surveys. SARC complies with all mandatory benefits prescribed by applicable laws. SARC also encourages its employees' planning for retirement and offers to eligible employees an employer-matched Retirement Savings Plan which includes pension and RRSP contributions. SARC provides its employees with a comprehensive employer-paid Group Health Benefit Plan and an employer-paid Employee Assistance Plan (EAP).

In SARC's own hiring practices, SARC employs best practice methods during the hiring process for prospective candidates to ensure that it hires employees in accordance with applicable laws. In March 2024, SARC reviewed and updated its existing Hiring Policy, and implemented its Hiring Employees Under Age of 16 Policy to address the intent of the Act by targeting the risks of child labour in its own activities. SARC's Hiring Employees under Age of 16 Policy requires that SARC obtain parental consent before hiring employees under the age of 16, and restricts these employees from working during school hours, limits the number of hours they are able to work during a school week, and prohibits the time of evening and morning that can be worked on any school day or day prior to a school day. SARC anticipates reviewing the above policies every 3 years.

SARC employees over 19 years of age are required to complete a criminal record check, which also verifies age, as per SARC's Hiring Policy. All employees are required to provide their Social Insurance Number ("SIN"), and where their SIN begins with a 9, SARC requires a copy of the employee's Work Visa. In preparing this Report, SARC has identified a gap in its due diligence processes as SARC currently does not verify the age of employees between the ages of 16 to 18. Beginning in May 2024, SARC has started the process of reviewing and adjusting its hiring practices to eliminate this gap and expects to comment on any due diligence policies and processes arising from this process in next year's report.

As noted earlier in this Report, SARC has established organization policies, guidelines and standard operating procedures which apply to all SARC divisions and all 73 SARCAN Recycling Division depots. These policies, guidelines and operating procedures govern operations, including the depots' hours of operation, employee job descriptions, and safety policies and procedures for employee protection. Any overtime hours worked must be voluntarily and mutually agreed to by the employee and their manager. Any work outside of usual hours, such as in the evening, overnight or weekend, or calls into work of an employee, are paid in accordance with the applicable report-to-duty rates. All SARC employees are paid their wages via an electronic transaction and receive a pay slip.

Changes to Site Visits

In May 2024, in anticipation of preparing this Report and after its 2024 financial year, SARC has included in its site visit report template, which are completed by the 5 regional managers employed in its SARCAN Recycling Division that are responsible for attending at and overseeing operations at the SARCAN Recycling Division depots at minimum every 6 weeks, space to record any observations of child labour and forced labour being utilized. This includes observations of any school-aged children employed and any observed staffing shortages that may result in increased overtime for employees. Completed site visit reports are shared with the Supervisor and Manager of the SARCAN Recycling Division depot site, which includes without limitation sharing any identified deficiencies, violations or concerns and expectations

regarding remediation measures. A copy of the site visit report is also filed at SARC's administration office in Saskatoon and reviewed by the Director of Collections for SARCAN Recycling Division. As the addition to the site visit report template regarding forced labour and child labour observations is new, SARC has not at this time implemented any specific measures to track this addition's success in preventing and reducing the risks of forced labour and child labour being used in its activities, however it anticipates considering in its 2025 financial year how the success of this addition can be tracked through its current site visit reports review process.

Risk Assessment and Management [Section 11(3)(c) of the Act]

During its 2024 financial year, SARC was in the early stages of assessing and identifying parts of its supply chains which may carry a risk of forced labour and child labour, however gaps remain in SARC's assessments. In SARC's assessments that have been completed, while confident that SARC's own activities and operations carry a low risk of child labour and forced labour being used, in SARC's view further assessment of its direct and indirect suppliers' activities as they pertain further down in SARC's supply chain in the manufacturing, accommodation and food services, cleaning and janitorial services, fabrication, and textiles industries is required given the associated risks of forced labour and child labour being used in those industries, as identified previously in the overview of SARC's supply chains provided in this Report.

In mapping its supply chains and identifying the generally known risks of child labour and forced labour associated with the types of goods and services procured by SARC as detailed above, SARC has identified that its indirect suppliers of its promotional textiles, such as the suppliers of t-shirts and hats to local companies located in Saskatchewan that affix SARC's brands and corporate logos before selling these items to SARC, may have a higher risk of forced labour or child labour having been used if they are mass-produced in countries with a greater prevalence of, and vulnerability to, child labour and forced labour. SARC has limited information regarding these indirect suppliers and recognizes procuring these items may increase the risk of forced labour and child labour being used further down in its supply chain. Further, SARC has identified that the procurement of janitorial services may have an increased risk of forced labour being used due to the nature of the industry employing individuals that may be more vulnerable to exploit, such as temporary foreign workers that are unaware of their rights at work. SARC does not currently have any policies or processes in place with its direct suppliers that specifically reference or address the use of child labour and forced labour in such suppliers' operations or supply chains, or which require SARC's suppliers to carry out due diligence on their own contractors and suppliers in prohibiting the use of child labour and forced labour in SARC's suppliers' activities and supply chains.

SARC's Senior Management Team and Senior Manager of Human Resources continue to meet monthly with the task of reviewing SARC's current practices and considering new or revisions to existing practices to manage and address the risk of forced labour and child labour in its activities and supply chains, and to review opportunities to improve SARC's due diligence processes and procedures.

Remediation Measures [Section 11(3)(d) of the Act]

In its 2024 financial year, SARC was not aware of any occurrences of forced labour or child labour practices occurring within its supply chain and activities. Accordingly, SARC did not take any measures to remediate any forced labour or child labour.

Loss of Income Resulting from Remediation Measures [Section 11(3)(e) of the Act]

In its 2024 financial year, SARC was not aware of any occurrences of forced labour or child labour practices occurring within its supply chain and activities and has therefore not taken any measures to eliminate the

use of forced labour or child labour. Accordingly, SARC did not take any steps to remediate any loss of income to the most vulnerable families as no remediation measures were taken.

Training Provided to Employees [Section 11(3)(f) of the Act]

Other than its Modern Slavery Policy, described in further detail below, SARC does not currently provide formal training to its employees on forced labour and child labour.

Assessing Effectiveness in Ensuring Forced Labour and Child Labour are Not Used in SARC's Activities or Supply Chains [Section 11(3)(g) of the Act]

In February 2024, SARC introduced a Modern Slavery Policy with the intent of ensuring that forced labour and child labour are not being used in its activities and supply chains. This policy, approved by SARC's Board of Directors, applies to all employees, directors, officers, volunteers and agents of SARC, and is applicable to its external consultants, third-party representatives, contractors and business partners. The policy requires all levels of management within SARC to ensure their direct reports comply with the policy. Additionally, the policy requires that all employees and members of SARC's Board of Directors read and comply with the policy. Training on the Modern Slavery Policy and on the risks faced by SARC of modern slavery in its supply chains will be provided as needed.

The Board of Directors of SARC has committed to reviewing this policy annually. At this time, SARC does not have any practices in place and has not taken any steps to assess the effectiveness of this policy, or to measure and track SARC's success in preventing and reducing the risks of forced labour and child labour in its activities and supply chains.

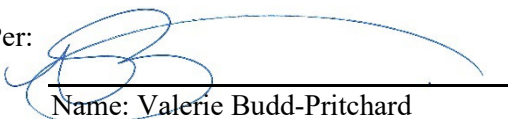
Approval of Report and Attestation [Section 11(4) and (5) of the Act]

This Report has been approved by the Board of Directors of Saskatchewan Association of Rehabilitation Centres in accordance with Section 11(4)(a) of the Act.

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 2024 financial reporting year.

SASKATCHEWAN ASSOCIATION OF REHABILITATION CENTRES

Per:



Name: Valerie Budd-Pritchard

Title: Board President, Director

Date: May 25, 2024

Per:



Name: Amy McNeil

Title: Executive Director

Date: May 25, 2024

I/we have authority to bind Saskatchewan Association of Rehabilitation Centres