



**SASKATCHEWAN ROUGHRIDERS**

*Saskatchewan Roughrider Football Club Inc.*

# **Modern Slavery Act Report**

*(Fiscal Year 2023-24)*





## **SASKATCHEWAN ROUGHRIDERS**

### **Modern Slavery Act Report Saskatchewan Roughrider Football Club Inc.**

This Modern Slavery Act Report (the “**Report**”) addresses the period from April 1, 2023 to March 31, 2024 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This Report is made on behalf of the Saskatchewan Roughrider Football Club (“**SRFC**” or the “**Company**”).

## **1. Introduction**

Modern slavery encompasses a range of exploitative practices, including forced labor, bonded labor, human trafficking, and child labor. It thrives in conditions of vulnerability, poverty, and inequality, preying on the most marginalized individuals and communities worldwide. Despite international efforts to eradicate it, modern slavery continues to affect millions of people, generating illicit profits for perpetrators while perpetuating suffering and human rights abuses.

While the sports industry is often associated with athleticism, competition, and entertainment, it is not immune to the scourge of modern slavery. Throughout the global supply chains that support sporting events, from the production of athletic apparel and equipment to the construction of stadiums and infrastructure, instances of exploitation and abuse have been documented across the world. Migrant workers, often lured by false promises of employment and better opportunities, find themselves trapped in exploitative labor conditions, deprived of basic rights, and subjected to physical, psychological, and financial coercion.

As a leading sports team in Canada, SRFC is dedicated to fostering a culture of integrity, respect, and social responsibility both on and off the field. In alignment with global efforts to combat modern slavery and uphold human rights, this report outlines SRFC’s commitment to ethical practices, measures taken to mitigate modern slavery risks, and the progress towards compliance with the Act.

## **2. Our Business**

SRFC is a professional football team within the Canadian Football League (“**CFL**”) based in Regina, Saskatchewan. SRFC was founded in 1910 and is a community-owned, non-for-profit company. The Club operates a diversified business model with revenue from tickets, concessions, sponsorship, merchandise as well as various other fundraising activities. The Club’s football operations, administration, retail operations and ticket operations are primarily based out of Mosaic Stadium in Regina, SK, with one retail store in Saskatoon. SRFC is affiliated with a charitable foundation, the Saskatchewan Roughrider Foundation Inc., which focuses on three community pillars being education, health, and amateur football. The Club employs just over 70 full-time staff as well as a full complement of part-time and seasonal staff primarily in the Club's merchandise and game day business. The Club is



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governed by a Board of Directors who have several sub-committees of the Board, an Audit & Finance Committee, Marketing Committee, and a Governance and HR Committee.

SRFC is a prominent professional sports team representing Saskatchewan on the national and Canada on the international stage. With a passionate fan base and a diverse range of stakeholders, we recognize the importance of ethical conduct and accountability in all aspects of our operations.

### **3. Our Policies & Values**

Our commitment to ethical practices is enshrined in our organizational values and policies. We are dedicated to promoting human rights, fair labor practices, and environmental sustainability throughout our supply chains and partnerships. We do not tolerate child, forced or bonded labour in any of our operations or the operations of those we do business with. We recognize that our responsibility goes beyond the boundaries of our organization, and through collaboration with stakeholders, industry peers, and relevant authorities, we are dedicated in preventing our activities from having a negative impact on any human rights. The following are some of SRFC's regularly reviewed policies that help support our efforts to respect human rights and mitigate risks related to Modern Slavery within our supply chain.

#### **Saskatchewan Roughrider Football Club Inc. Code of Conduct**

As an integral part of our business philosophy, we adhere to the highest standards of ethical conduct, integrity, and professionalism. The Club's Code of Conduct outlines the principles and guidelines that govern our interactions with customers, employees, partners, and the community. By upholding these principles, we ensure the sustainability and success of our business while contributing positively to society.

This Code of Conduct serves as a guiding framework for our business practices and reflects our commitment to ethical behavior, social responsibility, and continuous improvement. We expect all employees, directors, officers, players, and volunteers ("**Club Personnel**") to familiarize themselves with this Code and to adhere to its principles in all aspects of their work. The code outlines the standards of behaviour which are expected from Club personnel, including the basic standards, public safety standards, respect of fans, respect of community, respect of media, racial tolerance, online presence, and acceptance of gifts and benefits. Violations of this Code may result in disciplinary action, including termination of employment or contractual relationships, as appropriate.

#### **Saskatchewan Roughrider Football Club Inc. Core Values**

The core values adopted by the Club describe how the Club believes its Board of Directors, officers, employees, players, and volunteers, should act in order to accomplish the Club's mission. The core values are the principles that the Club has identified to guide the behaviours of all persons associated with the Club. The core value statement of the Club is as follows:





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“As a successful football club we value:

- **Integrity** – Maintaining truthfulness and morality
- **Community** – Supporting and inspiring the community that defines us
- **Accountability** – Taking ownership of our decisions and being responsible for our actions
- **Respect** – Showing consideration and honour in all interactions
- **Excellence** – Delivering outstanding results in a continuous manner”

### Saskatchewan Roughrider Football Club Inc. Grant of Authority

This policy is intended to provide guidance to members of the organization as to their accountability and limits to commit the Club’s resources for the operations of the organization.

Carrying out the business of the Football Club in an accountable and financially responsible manner requires clear requirements for signing authority, control and responsibility related to individuals making contractual, financial, and other commitments on behalf of the Club. All transactions and decisions must be properly approved by a level of authorization commensurate with their size and nature. Grant of authority delegation is outlined so members of the Club’s Board of Directors, Committees, management, and employees have greater clarity as to who has responsibility, accountability, and authority for decisions and transactions undertaken by the Club.

Overall business plans and annual budgets define the Club's operating & capital expenditure plans for the year. These are approved annually by the Club's Board of Directors. The authority delegation defined within this policy is designed to provide a framework to conduct business in by those who have the authority to commit the Club to transactions within the scope of the approved budget.

The foundational principle followed by the Club is that operating managers should have the authority to approve transactions that are part of their normal business operations and area of accountability. However, transactions that are of significant size, risk, and of great impact to the business require additional scrutiny & authorization by a higher level of authority.

### Other Relevant SRFC Policies

The Club has numerous other policies in place to promote and/or provide clarity, guidance, compliance, efficiency, fairness, conflict resolution, protection, and overall organizational success. Some of the policies that do not directly mitigate Modern Slavery but provide some alignment and guidance relating to general human rights include: Guiding Principles, Employee Orientation, Performance Management, and Respectful Workplace.





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### 4. Supply Chain Due Diligence & Assessing Our Risk

Assessing the risk of slave or forced labor in the supply chain is a critical process to ensure ethical sourcing practices and compliance with laws and regulations. Here are steps SRFC has taken to effectively assess the risk of modern slavery within our operations or activities, some of which are part of our normal supply chain due diligence:

**Supply Chain Management:** The Club has a strong understanding of its supply chain channels and has built strong relationships with its key suppliers which allows for effective management of the supply chain. Having a solid understanding of our supply chain allows for better coordination, helps drive efficiencies, and enhances our ability to adapt to changes or disruptions in the supply chain.

**Identify High-Risk Areas:** Certain industries and regions are more susceptible to slave labor practices. High-risk sectors may include agriculture, manufacturing, construction, hospitality, and mining. Additionally, regions with weak labor laws, low wages, and high levels of poverty are often associated with increased risk. When considering the Club's business activities, its retail suppliers would be considered its higher risk area.

**Engage with Suppliers:** Established open communication channels with suppliers to understand their business models, with a key focus on utilizing Saskatchewan and Canadian based suppliers. The Club's key retail suppliers are also licensed with the CFL which those agreement's include broad compliance obligations that CFL and SRFC has relied on to ensure that no forced or child labour is used in connection with the manufacture of its branded goods.

**Monitor and Evaluate Performance:** Monitor supplier performance and identify any changes or trends that may indicate an increased risk of slave labor.

**Collaborate with Stakeholders:** Collaborate with industry peers and monitor government agencies to assess any information on inappropriate business practices.

**Continuous Improvement:** Continuously review and update risk assessment processes to adapt to changing circumstances, emerging risks, and evolving best practices. Seek feedback from stakeholders and incorporate lessons learned to enhance the effectiveness of our efforts.

**Capacity Building:** We support capacity-building initiatives to educate & empower our employees. This includes providing training on labor rights, health and safety standards, and ethical business practices to enhance awareness and compliance.

By systematically assessing the risk of slave labor in our supply chain, SRFC strives to mitigate ethical and reputational risks, promote responsible sourcing practices, and contribute to the eradication of modern slavery.



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### **Progress and Next Steps**

We recognize the importance of supporting the efforts to eliminate modern slavery in business practices and look to support those efforts through the Club's business activities. Moving forward, we will continue to refine our due diligence processes, incorporating feedback and lessons learned to strengthen our approach to identifying and mitigating modern slavery risks.

### **5. Remediation Measures**

Based on our assessment of our activities, specifically the assessment and ongoing due diligence relating to SRFC's supply chain, there were no measures taken to remediate the loss of income or remediate any incident of forced or child labour given there were no Modern Slavery identified in either our operations or supply chain.

### **6. Assessing Effectiveness**

SRFC monitors compliance and effectiveness of all policies on an ongoing basis. Any complaints or breach of policy is reported to SRFC's Human Resources and follows the appropriate protocol that is outlined in SRFC's Code of Conduct. In the 2023-24 fiscal year, no formal complaints or breaches have been identified or reported with relation to modern slavery activities.

SRFC assesses the effectiveness of our approach to and compliance with the Modern Slavery Act by:

- ensuring alignment to relevant legal framework or standards;
- regularly reviewing SRFC's policies and procedures that relate to forced labour or child labour;
- following the supply chain due diligence outlined above;
- obtain feedback from employees, community and key stakeholders;
- raising awareness and educating;



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### **7. Board of Directors Approval and Attestation**

This Report was approved by SRFC's Board of Directors on May 28, 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 SRFC. 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.

*I have the authority to bind Saskatchewan Rougher Football Club Inc.*

Craig Reynolds

President and Chief Executive Officer

May 29, 2024