

Supply Chain Transparency Report Financial Year 2023

1. Reporting Requirement

This Supply Chain Transparency Report (the “**Report**”) has been prepared by Signature Senior Living Ltd, on its own behalf and on behalf of certain of its wholly-owned subsidiaries¹ (collectively, “**Signature**”) pursuant to the reporting requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”). In this Report, “we”, “us”, “our”, “Signature” and “the company” means collectively Signature Senior Living Ltd and the subsidiaries. This Report describes the steps Signature has taken during the period beginning on January 1, 2023 and ending on December 31, 2023 (“**Fiscal 2023**”) to prevent the use of forced labour and child labour in its activities and supply chains.

2. Activities, Structure and Supply Chain

Signature Senior Living Ltd is a holding company which, through its subsidiaries, is primarily engaged in the development and management of senior residences and the provision of personalized care and services for older adults in United Kingdom. Signature operates several different types of facilities, including independent living facilities, assisted living and memory care facilities, retirement homes, skilled nursing facilities and home healthcare. Signature is a wholly-owned indirect subsidiary of the Public Sector Pension Investment Board (“**PSP**”), which is a Canadian Crown corporation. Signature Senior Living Ltd is a limited liability company incorporated under the UK Companies Act 2006. Signature Senior Living Ltd registered and head office is located at Signature House, Post Office Lane, Beaconsfield, Bucks, HP9 1FN. Signature’s Subsidiaries are responsible for Signature’s business operations. The following wholly-owned subsidiaries (the “**Management Subsidiaries**”) are responsible for the majority of Signature’s procurement:

- Revera Signature Opco LLP, a United Kingdom registered company, manages 4 facilities in the United Kingdom, Signature at Hendon, Signature at Banstead, Signature at Weybridge and Signature at Coombe Hill Manor.
- Signature of Hertford (Operations) Ltd, a United Kingdom registered company, manages 1 facility in the United Kingdom, Signature at Bentley House
- Gracewell Operations (Ascot), a United Kingdom registered company, manages 1 facility in the United Kingdom, Signature at Ascot
- Signature Senior Developments Limited (“**Signature Developments**”), a United Kingdom registered company, is Signature’s development arm that builds new facilities.

Signature Senior Living Ltd does not produce, purchase or distribute goods in Canada or elsewhere, other than very minor dealings. The Signature Management Subsidiaries procure a large number and variety of products and services as part of delivering their services. Signature Senior Living Ltd has a number of other direct and indirect wholly-owned subsidiaries. However, none of the other subsidiaries is responsible for the purchase or distribution of goods, other than very minor dealings.

The Management Subsidiaries’ supply chain involves the purchase and distribution of goods for use in Signature’s business, including, among other things, medical supplies, food, office supplies, furniture, fixtures and equipment (FF&E), linens, kitchen supplies, and cleaning supplies. Signature

Developments' supply chain involves the purchase and distribution of goods required for the development and construction of new facilities, including, among other things, building supplies, lumber, fixtures, and the supplies needed to operate the facility upon move in of first resident.

Signature Senior Living Ltd's Tier One direct suppliers are generally all located in the United Kingdom. Each of the Subsidiaries generally purchases goods from a supplier located in the jurisdiction in which the applicable Subsidiary's facilities and operations are located.

3. Policies and Processes Relating to Forced Labour and Child Labour

Through our organizational and governance policies Signature communicates our values and expectations, setting a high bar for ourselves and our suppliers. Signature Senior Living Ltd does not tolerate any forms of forced labour or child labour and we make every effort to prevent our activities from having a negative impact on human rights. Our relevant policies include the following:

Code of Conduct

Signature Senior Living Ltd's Code of Conduct (the "**Code**") applies to Signature Senior Living Ltd and its affiliates, operating entities and subsidiaries, including the Subsidiaries. It covers a wide range of business practices and procedures and sets out the guiding principles by which we expect our employees, contractors and vendors to govern themselves in performing their job duties, including that they should always act lawfully, ethically and in the best interests of Signature. The Code is intended to alert Signature employees, contractors, volunteers, and board members of the legal, compliance and ethical issues that may arise during the course of employment or contractual arrangement with Signature. Notably, the Code requires all persons with whom Signature does business to comply with all applicable laws in the jurisdictions in which Signature operates. Failure to comply with applicable laws may result in disciplinary action, up to and including termination, and cessation of business.

The Code includes a violation reporting process whereby any person subject to the Code is expected to report compliance issues, ethical concerns and improper conduct. In addition, Signature has developed an Ethics and Compliance Hotline Complaints Policy (the "**Policy**") whereby employees, contractors, volunteers, residents and family members of residents are provided with a confidential, non-retaliatory mechanism to report potential compliance violations. Pursuant to the Policy and the Code, Signature has established several channels for reporting compliance issues, ethical concerns and improper conduct, including a third-party run Ethics and Compliance Hotline which is available 24-hours a day. All reports are treated as confidential. No retaliatory action will be taken against any individual who reports compliance violations in good faith through the Hotline. The Code of Conduct and contact details for the Ethics and Compliance Hotline are posted on Signature's intranet and public website. Additionally, all Signature team members received mandatory training on the Policy and the Code.

Compliance Plan

It is the fundamental policy of Signature that its business is conducted in compliance with all applicable U.K. federal laws and regulations and Signature's ethical standards. Signature's Compliance Plan (the "**Plan**") provides an overview of Signature's compliance program and its basic requirements. The compliance program's purpose is to assist Signature in developing effective internal controls that promote adherence to applicable law and health care program requirements.

The Plan provides that Signature will not knowingly employ or contract with any individual who has been convicted of any criminal offence that bars the person from working in the senior housing industry. It is Signature's policy to make reasonable inquiry into the background of current and prospective employees, contractors and vendors whom Signature employs and with whom Signature does business.

Due Diligence Processes

Signature expects third parties with whom we contract to adhere to business principles and values similar to our own and to comply with applicable laws and regulations. As described above, we have embedded responsible business conduct into our policies and management systems, some of which apply equally to our vendors as they do to our team members. These policies and practices are communicated to all members of the Signature team.

In addition to our policies, Signature includes contractual provisions with respect to compliance with laws in its vendor and supplier agreements, as the context warrants.

In addition to the controls in effect for purchasing by the Management Subsidiaries, Signature has also implemented controls at the local facility level that mitigate the risk of forced labour and/or child labour. These controls include spending limits at each of our facilities for any local purchase of supplies.

4. Areas of Risk

Signature operates within the United Kingdom. The Signature Subsidiaries' core direct suppliers are United Kingdom based. The United Kingdom has robust pre-existing labour, employment and human rights legislation that mitigates the risk of forced labour and child labour in our operations and supply chain. This is enhanced by Signature's own policies and its Compliance Plan, as set out in this Report. Given the foregoing, in Fiscal 2023, Signature considered its supply chain and activities and did not determine that any component of its supply chain carried a material risk of forced labour and/or child labour. Accordingly, we have determined that Signature Senior Living Ltd's activities and its direct supply chains do not carry a material risk of forced labour and/or child labour.

5. Remediation Measures

In Fiscal 2023, no incidents of forced labour or child labour were reported or identified within Signature or its supply chain. As a result, remediation measures did not need to be taken to correct any forced labour or child labour or to compensate for the loss of income to vulnerable families.

6. Effectiveness Assessment

Signature acknowledges that forced labour and child labour are possible risks within its operations and supply chain. In order to assess our effectiveness in preventing the use of forced labour and child labour in our activities and supply chains, we periodically review and audit our policies and procedures described above.