

## **Modern Slavery Act Report – 2023**

### **Introduction**

At SJC, we do not tolerate modern slavery or any unethical behaviours that violate human rights. Modern slavery, which includes forced labour and child labour, is a global concern and one that goes against our core beliefs and values, including *Respect Every Individual as Equal*. If we become aware of any unethical or illicit behaviours that we and the law consider to be unacceptable by our employees, freelancers, suppliers, or anyone we do business with, we will immediately address the situation and proceed in a way that minimizes harm to those affected. We maintain a strong commitment to growth and continue to adapt, develop, and implement new policies and procedures to better protect our vulnerable communities and people.

In our 2023 reporting year, we took a number of steps to better address and prevent forced and child labour in our operations and those of our suppliers. We've mapped our activities and supply chains as well as completed an internal risk assessment to prioritize the most severe areas of risk. Additionally, we have maintained internal controls to guarantee workers are recruited voluntarily and we are developing training related to modern slavery. Using our risk assessments and the information gathered from the supply chain mapping, we were able to develop an action plan and due diligence policies and processes to address modern slavery and protect children and labourers. In the coming year, we will continue to develop, improve, and implement these policies and controls and will continue to work towards maintaining a supply chain with very minimal risk of modern slavery.

### **Structure, Activities, and Supply Chains**

St Joseph Printing Limited (SJPL), which operates under the name St. Joseph Communications (SJC), is the entity that contains our Print division. 1772887 Ontario

Limited, which operates under the names SJC Content and SJC Media, is a wholly owned subsidiary of SJPL. Both entities are located in Canada.

SJC and its subsidiaries are involved in numerous business activities, including producing goods in Canada, selling goods in and outside Canada, distributing goods in and outside Canada, importing goods into Canada, and controlling an entity or entities engaged in any of the previously mentioned activities.

Our supply chains involve several vendors and suppliers, the greater part of which are located and operating in North America. Our Print division's largest vendors are North American paper suppliers. For SJC Content and SJC Media, creative work is either produced in-house or sourced through highly skilled freelancers that are primarily located in North America.

## Risks

As the vast majority of our vendors and suppliers are located and operating in North America, risk exposure to Canadian and American labour law violations is relatively low. Our Print manufacturing is also entirely in house, enabling us to guarantee proper conduct and practices.

We have identified and recognize risks related to some of the products we purchase, raw materials or commodities used in our supply chains, tier three and beyond suppliers, and the use of outsourced labour. Though we source predominantly from North America and can be reasonably sure that our tier one and two suppliers are not engaging in any modern slavery or unethical behaviours and practices, we acknowledge that those in tier three and beyond of our supply chain may be sourcing or operating in higher risk locations or industries. We also recognize that the following sectors and industries related to our supply chain carry risk;

- Electronics/technology
- Forestry

- Manufacturing
- Transportation and warehousing

We maintain the commitment to further evaluate and identify areas of risk in our supply chains and improve our policies and procedures to address them.

### Our Policies

Our SJC policies and procedures align with human rights and provincial employment standards legislation, as well as all Canadian labour laws. Our associate handbook sets out to ensure all employees, visitors, contractors, and customers of our company and its subsidiaries are respected and treated fairly in accordance with their human rights. The handbook outlines specific behaviours and practices that are unacceptable for those who are a part of SJC and represent the company. Additionally, we have a code of ethics that outlines our commitment to honest and ethical conduct in all areas of our organization.

Relating to our paper suppliers and forestry risks, we have embedded responsible business conduct in our policies, as the large majority of our paper is Forest Stewardship Council (FSC) certified. This ensures the trees used to make the paper has been ethically sourced in a way that protects biological diversity and benefits the lives of local people and labourers.

For our creative freelancers located outside North America, we have existing policies in place to ensure they are in compliance with our internal policies and procedures, which includes avoidance of forced or child labour.

While these policies do work toward keeping our business practices and partners within our standards and ethical code, we are in the process of implementing vendor qualification questionnaires and due diligence processes to better ensure labour laws specifically are being respected across our entire supply chain.

## Remediation

As per our associate handbook, our Open Door Policy promotes the fostering of open communication and trust between employees and their supervisor, Human Resources, or any company manager. We strongly encourage all employees to discuss any problems or concerns promptly with a manager or Human Resources. This includes misconduct by employees or members of our supply chain. In any suspected case of modern slavery, we will immediately address our expectations and relationship, and work to promptly identify those affected by the wrongdoing and provide appropriate remediation.

To date we have not identified or been advised of any forced or child labour use, nor any loss of income to vulnerable families as a result of measures we have taken to eliminate modern slavery.

## Training

Our employees are required to read and sign to acknowledge understanding of our associate handbook, which outlines our expectations of conduct as well as all of our internal policies. This includes expectations of ethical business practices and our right to take disciplinary action in cases of noncompliance. Additionally, we are continuing to develop training to specifically address forced and child labour to improve understanding of modern slavery, and reinforce that it is not an acceptable practice by SJC or our suppliers.

## Assessing Effectiveness

We have and will continue to review our policies and procedures as well as emerging laws and legislation to determine if there are any enhancements to be made. We intend to review our supplier questionnaire to establish continuous compliance, as well as



set key performance indicators where necessary to confirm our actions and risk management efforts are successful and serve to protect those most vulnerable.

Conclusion

SJC and its subsidiaries remain dedicated to sustained and earnest growth in all areas of our organization and business practices. This includes our assurance to maintain ethical conduct, fair treatment, and human rights policies and practices. We intend to review and revise our policies and due diligence processes to continue to best serve our communities and help prevent modern slavery.

Approval and Attestation

This report has been approved by the governing body of SJC.

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 reporting year listed above.

A handwritten signature in black ink, appearing to read 'Tony Gagliano', with a stylized, cursive script.

Tony Gagliano  
Chief Executive Officer  
SJC  
May 22, 2024