

Winnipeg Football Club

Modern Slavery Act Report

January 1, 2023 to December 31, 2023

Overview

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) imposes an obligation on entities to report on the measures taken to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This report refers to the 2023 fiscal year-end, being January 1, 2023 to December 31, 2023, and addresses the steps taken by the Winnipeg Football Club (the “Club”, or “WFC”) in 2023 in regards to the Act.

Incorporated in 1951, WFC is a non-share, community corporation that is responsible for the operation of the Winnipeg Blue Bombers professional football franchise and related business activities including administration, retail, ticket operations, stadium operations, and community outreach programs and activities. The operation is primarily based out of the recently renamed Princess Auto Stadium on the University of Manitoba campus in Winnipeg, Manitoba. The Winnipeg Blue Bombers are a member Club of the Canadian Football League (the “CFL”). WFC had over 1,000 casual, part-time, and full-time employees in 2023 and is governed by a Board of Directors, who also participate in several sub-committees such as the Executive Committee, Governance and Nominating Committee, Finance and Risk Committee, and Community Relations Committee.

The Club is dedicated to the support and development of amateur football in Manitoba through various programs for young athletes and amateur coaches and is committed to making a positive impact within the community. In 2023, WFC actively participated in and hosted over 200 community events, showcasing its dedication to community involvement.

WFC is committed to maintaining the highest standards of ethics and integrity in its operations to comply with all applicable human rights and employment standards. The Club’s expectation is that our business partners and suppliers adhere to the same principles within their operations. The policies and steps the WFC has taken to address and mitigate modern slavery risks are detailed below.

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

1. Employee and Volunteer Management Process

WFC complies with the Province of Manitoba’s Employment Standards program under Manitoba Finance for all employees. The program administers laws on minimum wages, protection for young workers, hours of work, holidays, and other workplace entitlements and responsibilities. The program enforces The Employment Standards Code, The Construction Industry Wages Act, The Remembrance Day Act, and The Worker Recruitment and Protection Act. It also investigates complaints about violations of these laws.

All full-time staff must adhere to the Club’s Human Resources Policy (“HR Policy”) manual. This HR Policy covers the Club’s guiding principles, with emphasis on respecting

human rights and the prohibition of involuntary labour practices. Staff confirm their understanding and compliance with the HR Policy on an annual basis. Additionally, WFC provides annual diversity and inclusion training for all full-time staff and reviews all documented violence and harassment prevention policies on an annual basis in accordance with the HR Policy.

In addition to the HR Policy, the Club maintains a Safety and Health Management System Policy manual. This manual describes the basic safety standards by which employees must abide by while working for the Club or while working at Princess Auto Stadium. Additional rules and instructions may be issued verbally by Winnipeg Football Club Supervisors or Management from time to time and as required.

Players are governed by the CFL's code of conduct. While players may come from outside Canada to join the football team, these team members must obtain a work permit to work in Canada by applying through the applicable Government of Canada Immigration process. In addition to completing an application form, all applicants must disclose if they have ever been charged or convicted of any criminal offences in any country or territory and if the applicant has ever been refused a visa or permit, denied entry, or ordered to leave Canada or any other country or territory.

The WFC had approximately 300 active volunteers in 2023 under the Fan Ambassador volunteer program. Volunteers contact the WFC to indicate their interest in becoming a Fan Ambassador. Volunteers typically go through an interview and orientation process. The volunteers assist with ticket scanning, ushering, parking, administrative duties, and community relations projects. Volunteers may receive game tickets, a store discount, and/or store gift cards to acknowledge their contribution to the football organization.

2. Whistleblower Protection

The WFC has a Whistleblower Policy that applies to all WFC employees, volunteers, and Board Members.

The WFC Standards of Behaviour are set out in Section 2.0 of the WFC Human Resources Policies and WFC Personnel are required to comply with the Standards of Behaviour. These standards include expectations that all WFC Personnel shall at all times:

- Comply with the law and avoid any activity which breaches application law (Federal, Provincial, and Municipal) (the "Legal Conduct Standard")
- Act ethically and with honesty and integrity (the "Ethical Conduct Standard")

The Whistleblower Policy is intended to encourage and enable WFC Personnel to raise serious concerns about violations or suspected violations of the Legal Conduct Standard and/or Ethical Conduct Standard without retaliation from any party in any form. Where a

report is made pursuant to the Whistleblower Policy, WFC will also endeavour to maintain the confidentiality of the individual making the report whenever possible.

Structure, Activities and Supply Chain

1. Structure

The Winnipeg Football Club has a robust governance structure in place to ensure that policies are in place and best practices are being followed. Oversight is provided at various levels of governance including the Board of Directors, Board sub-committees, and senior executive management. The Finance and Risk committee oversees the risk management process including the Club's legal and regulatory compliance.

2. Activities and Supply Chain

WFC globally sources football equipment for use by the team and goods for its retail operation that are sold throughout its store and online platform. The WFC acknowledges there is a risk of exploitation in the global supply chain for the supply of sporting equipment and the production of athletic apparel and other items used in related retail operations. In 2023, purchases were made through established, reputable, well-known vendors/ manufacturers/ distributors in the United States or through established exporters and manufacturers in China and Hong Kong.

WFC does not currently have its own direct supplier compliance review program. It relies on each supplier to manage compliance with child and forced labour laws and Canadian market expectations. The WFC has built strong relationships and communication channels with key suppliers, which allows for insight and management of key supply chains. This helps provide some assurance to the Club that each supplier is complying with child and forced labour laws and Canadian market expectations.

WFC also collaborates with the CFL, CFL member Clubs, and other major league sports industry partners to monitor various suppliers and their adherence to practices in preventing child and forced labour in the production and distribution of imported sports equipment, athletic apparel, and retail goods. While the CFL is not itself an importer or producer of goods with reporting obligations under the Act, the CFL's current agreements with licensees to use the CFL and/or the Club's marks for merchandise include broad compliance obligations that the CFL and the Club has relied on to ensure that no forced or child labour is used in connection with the manufacture of its branded goods and that the license agreements include record-keeping, oversight, audit and remediation clauses to drive compliance among our licensees.

Moving forward, WFC will continue to refine its efforts to ensure it is identifying and mitigating modern slavery risks in its operations.

Remediation Measures

To date, based on a review of operations, payments, and related activities, there have been no measures taken by the WFC to remediate a loss of income to vulnerable families or remediate any forced labour or child labour incidents in either our operations or supply chains.

Assessing Effectiveness

The Winnipeg Football Club has begun the process to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains. This is accomplished by:

1. Review of all policy and procedure manuals on an annual basis to ensure they include all applicable employment standards.
2. Ensure the Club's Modern Slavery Act Report aligns with legal requirements.
3. Perform due diligence practices for vendors during the purchase order process.
4. Educate all employees and raise awareness of our obligations under legislation.

Board of Directors Approval and Attestation

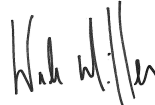
This Report was approved by WFC's Board of Directors on May 29, 2024.

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 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.



Mike Pyle
Chairman of the Board

*I have the ability to bind the
Winnipeg Football Club*



Wade Miller
President and CEO

*I have the ability to bind the
Winnipeg Football Club*