

FH

FRIDAY HARBOUR®

*All Seasons Resort*

Modern Slavery Statement 2024

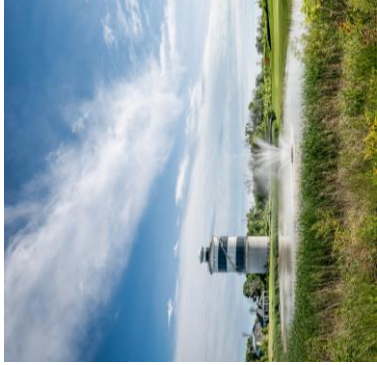


# FRIDAY HARBOUR RESORT

Innisfil, Ontario

Set on the shores of Lake Simcoe, about an hour's drive from Toronto, this stunning waterside community offers a unique blend of urban energy and natural tranquility.

# About Friday Harbours' Structure, Business & Supply Chains



Friday Harbour is a Canadian luxury lifestyle resort community and all-seasons destination, providing superior facilities, modern design, and world-class experiences for homeowners, guests, and visitors alike.

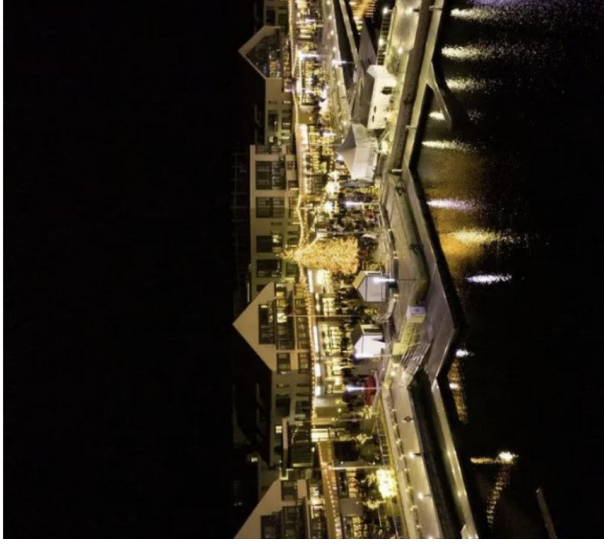
Operating on the shores of Lake Simcoe, The resort is 600 acres, consisting of a top 100 golf course in Canada, the largest man-made marina in North America, a 200-acre nature preserve, many restaurants, retail & leisure offerings along our promenade. In addition, Friday Harbour develops & constructs homes through our partners, where nearly 1,500 homes will have been occupied by the end of 2024.

Friday Harbour only operates at the resort location. Most of our vendors are from the same region, ensuring that Friday Harbour has more visibility & transparency over the vendor practices.

# Friday Harbour Codes, Policies & Statements

Friday Harbour maintains several code of conducts, policies & statements including:

- Friday Harbours' Code of Conduct & Ethics.
- Friday Harbours' Vendor Code of Conduct & Ethics.
- Friday Harbours' Workplace Violence & Harassment Policy.



## 2024 Achievements

1. *Implemented a new policy specific to addressing child labour, forced labour, human trafficking and slavery for all our leaders.*
2. *Modified the Vendor Code of Conduct to include a specific clause around Friday Harbours' expectation to address these matters.*

Friday Harbour holds itself accountable to the highest ethical standards. Through these documents, Friday Harbour outlines the minimum expected standards for our employees & all our affiliated vendors.

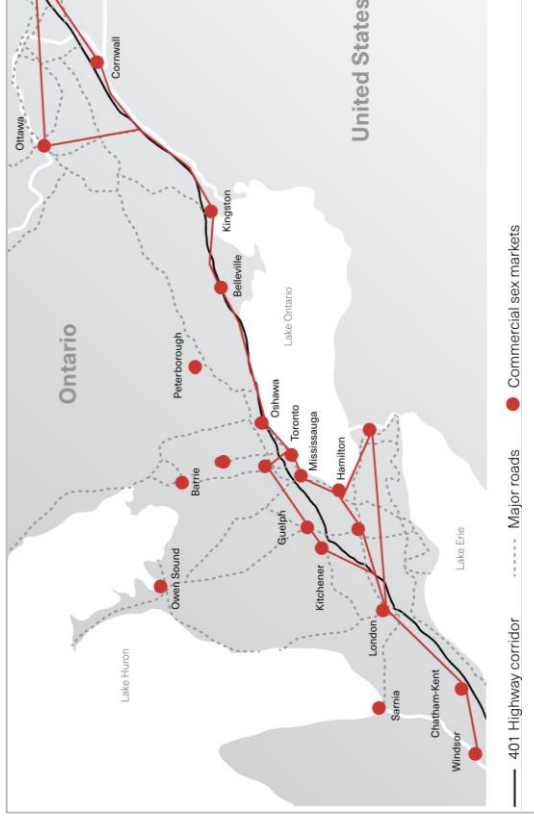
We are committed to following policies and practices in accordance with human rights legislation, the Occupational Health & Safety Act, equal employment opportunity legislation and all federal & provincial laws.

All colleagues are required to follow this code, and we have clear accountability mechanisms in place to encourage reporting of any potential non-compliance with these standards. We require all business to be conducted with honesty & integrity, and in conjunction with training, it establishes ethical standards and guidelines for how we do business.

# Awareness of Geographical & Industry Risks

Human trafficking is a complex crime that is often difficult to detect. It involves the recruiting, transporting, transferring, receiving, holding, concealing or harbouring of a person, or the exercise of control, direction or influence over the movements of a person to exploit or facilitate the exploitation of that person (*Public Safety Canada*).

- 96% of Canadian human trafficking cases since 2005 were domestic, not international (*Ontario Association of Childrens Aid*).
- 62% of all human trafficking cases reported in Canada, occurred in Ontario, & 80% of reported cases occurred in Census Metropolitan Areas (*Statistics Canada*).
- 5,500 trafficked cases were reported through services agencies across Canada, with 50% of all cases occurred in Toronto, Ottawa & Montreal (*Ontario Association of Childrens Aid*).
- Sex (70%) & labour (7%) trafficking are the most common forms of the crime, with most cases occurring within hospitality, health & beauty, cleaning services, construction & farming. (*Canadian Centre to End Human Trafficking*).



Friday Harbour operates within this geographical risk area of the 400 & 401 highways, close to the CMA of Toronto. In addition, we operate within three of the five most high-risk industries for human trafficking. Our awareness to what is around us, is key in the fight against this occurring.

## Risks In Our Supply Chain

Friday Harbour recognizes the exposure to the risk of modern slavery increases when businesses engage with suppliers in certain categories or geographies. We understand that we operate within three of the five most high-risk industries, and that we purchase & have a tenant operating at our resort in the final two industries.

We have identified that our areas of most risk are through third party vendors, where we do not have full transparency and control. These include the purchasing of the following:

- Clothing & textiles (uniforms, towels & cleaning).
- Technology hardware.
- Fresh fruit & vegetables.
- Meat & seafood.
- Repairs, maintenance & construction.



### **2025 On-going Target**

*Set out priorities for strengthening human rights due diligence in our supply chain. This includes enhancing our risk assessment of new suppliers and providing additional training for our procurement team. The team are to then work with our suppliers to confirm, within reasonable doubt, there are no breaches of rights.*

# Additional steps taken to address the risk of forced labour at Friday Harbour

## Background checks through Sterling Backcheck

- Sterling is a trusted global screening partner which combines deep regional screening and compliance expertise with an extensive operational footprint to help simplify the complexities of global background checks. Sterling provides highly localised technology-enabled experiences, tools, and services to more than 50,000 clients globally. Their extensive portfolio allows us to conduct an international background check quickly and easily, regardless of where your candidates live or work.

## Screening of minimum age

- Passport & document checks take place for each & every member of staff. In addition, every position resort wide requires the candidate to confirm during the screening interview that they are comfortable for us to conduct background checks as a condition of employment, for this they must be a minimum of 18 years olds. In addition, they must confirm they are greater than 14 years old to be able to work in Ontario.

## Be Our Guest

- Friday Harbour support programs that help prepare high school youth with life & hospitality skills through partnerships with the non-profit organisation in Ontario.

## Fortinet Cloud Security

- Provides security for our operations by blocking all online access to child sexual abuse images and pornographic images of any kind from Friday Harbour systems.

## Labour Market Impact Assessment (LMIA)

- Friday Harbour engage a third party that operates globally to assist entities apply for LMIA employees. The candidates go through rigorous background checks to ensure they consent to their application & that all legal requirements are met.

## 2024 Achievement

*Implement a new whistleblower policy for any employees to report anything of concern on an anonymous basis to an independent representative of Friday Harbour.*

# Steps to remediate the loss of income to the most vulnerable families

Friday Harbour continues to work with and support our local community to help the most vulnerable families in South Simcoe. By contributing to these established foundations, we can ensure that we are benefiting those in need. We collaborate through many different initiatives; including the Canadian Foundation for Aids Research (CANFAR) and YMCA, in addition to the following partners:

## **Troy Scott Community Fridge, Innisfil & the Innisfil Food Bank**

- The Troy Scott Community Fridges are an initiative to increase access to nutritious food for all Innisfil residents. The community fridges rely on donations from individuals, businesses, and organizations. Friday Harbour continue to contribute to this important cause, since its inception in 2021, to support those in a vulnerable position and address rising community food insecurity.

## **Christmas for Kids, Innisfil**

- A children's charity local to Innisfil, supporting families that are in crisis needing; food, warm outerwear, boots and other supplies. Assisting children all year round to ensure that they are not missing out on the important programs that other children are enjoying.

## **Dress for Success, Orillia and Barrie**

- The organisation aids women and non-binary individuals at critical life transitions of employment or re-employment. Their programs focus on providing a continuum of support and opportunities for our clients to compete and advance in the ever-changing workplace.

## **RVH Foundation**

- Two events (Keep Life Wild & Take the Plunge) were held in 2024 to drive donations towards building the Royal Victoria Hospital (RVH) expansion into Innisfil, providing care and support for a growing population.

# Training & Prevention

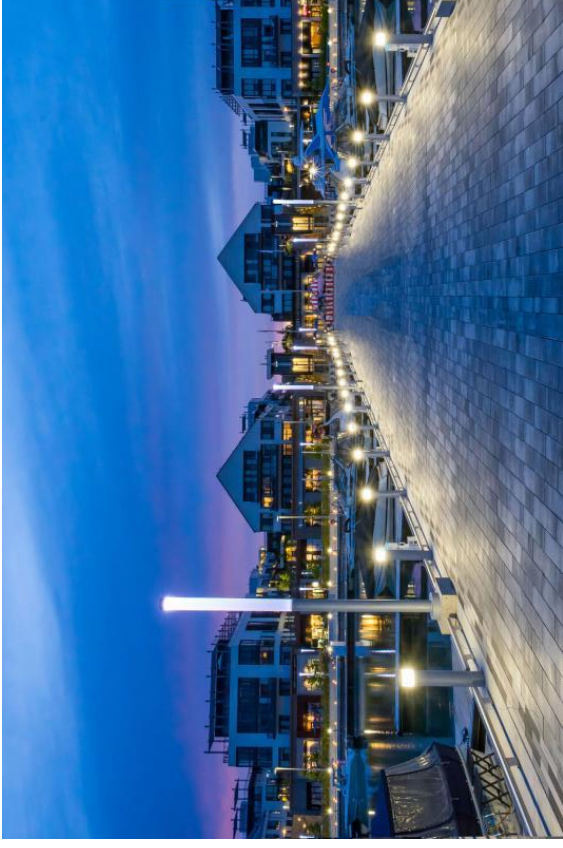
Friday Harbour employees receive regular tailored training on ethical topics & our policies. All new employees are assigned a mandatory onboarding training package which includes training on our Code of Ethics. On an annual basis, or whenever our handbook is changed, this is shared with every employee at the time of the modification.

In addition to new hire & annual compliance training, Friday Harbour provides the following resources to all employees:

- HR Downloads – an employee training portal.

Comprising of the following course areas:

- Accessibility
- Human Resources
- Health & Safety
- Performance & Conduct
- Professional Skills
- Workplace Wellness
- Compliance

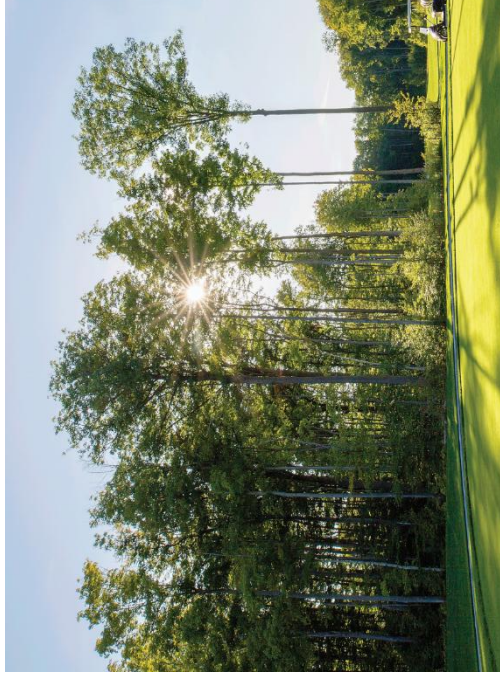
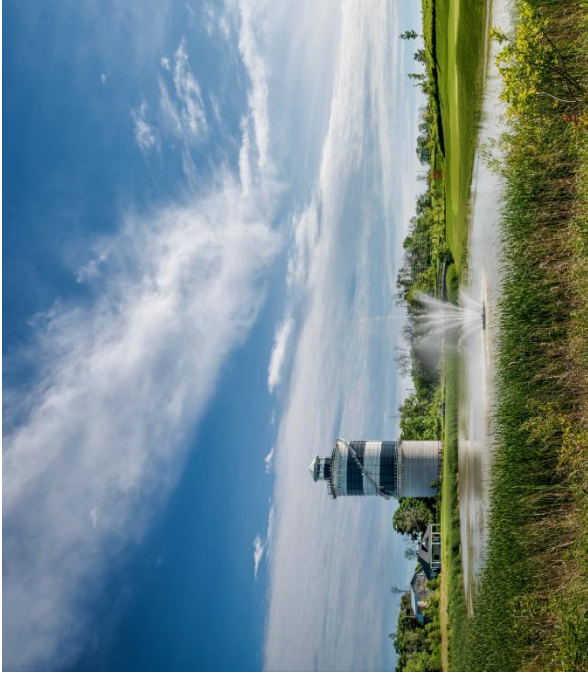


## 2025 Target

1. *Investigate joining the World Sustainable Hospitality Alliance – Friday Harbour strongly believes that industry & cross-industry collaboration plays an important role in addressing human rights risks through focusing attention & action towards a joint purpose, with the potential of driving systematic change.*
2. *Provide training to our leaders that will highlight & bring awareness to the signs of human trafficking and forced labour (this training was completed by our Purchasing department in 2024).*

# Final Statement & Evaluating Effectiveness

---



Friday Harbour focuses on four core values; Passion, Integrity, Excellence and Respect. These core values guide every aspect of our business, and they are central to our commitment to protecting human rights. Friday Harbour respects the fundamental human rights of all people, as embodied in the United Nations Universal Declaration of human rights. Our zero-tolerance approach to human trafficking reflects our deep commitment to human rights and the dignity of people everywhere. We manage our business in line with this belief and strive to foster similar ideas in those with whom we do business.

In 2024 we have established a solid foundation for growth, in monitoring & investigating further into ensuring these risks are always minimized. We continued to grow from 2023 by advancing our training on human trafficking, forced & child labour; giving our teams the tools to enable them to spot any flags in their roles. While digging deeper into our supply chain to verify beyond reasonable doubt, the appropriate business operations of our vendors.

Friday Harbour is committed to continuously reviewing the impact of its activities to address modern slavery. We recognize that modern slavery is a complex and hidden issue that requires proactive effort to uncover. As we continue to strengthen our due diligence activities, we will explore additional ways to assess the effectiveness of our actions.

## Approval & Attestation

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.

I have the authority to bind Friday Harbour LP.



Full Name: Ross Sinclair

Title: Board Director

Date: 8<sup>th</sup> April 2025

