



### **Modern Slavery and Human Trafficking Statement**

This statement is made pursuant to Canada's *An Act to enact Fighting Against Forced Labour and Child Labour in Supply Chains Act and to Amend the Customs Tarriff* and set out the steps The Brenda Strafford Foundation Ltd ("BSF", "the Organization" or "We") has taken to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain.

BSF is a registered Canadian charitable organization based in Calgary, Alberta Canada. The objectives of the organization are:

- to promote health by operating nursing homes within Canada in accordance with the appropriate laws or regulations;
- to promote health by providing affected populations with health care services or products that prevent and manage serious threats to health and survival;
- to promote health by protecting and maintaining public health through the operation of eye care hospitals, health care clinics and the support of established medical centres outside Canada;
- to address and prevent specific problems faced by families by providing counselling and outreach programs to individuals affected by family violence;
- to establish and carry on the operation of medical clinics either within or outside Canada to provide care and facilities for the poor and needy; and
- to receive and maintain a fund or funds and to apply all or part of the principal and income therefrom from time to time, to qualified donees as defined by the Income Tax Act (Canada).

Currently the organization operates five care facilities within Calgary and surrounding area, a second-stage shelter for women and children escaping domestic violence in Calgary, and also provides health care in Haiti and Jamaica in areas in need of access to health care. The organization also supports other organizations in the Calgary area as well as several research initiatives in conjunction with partnerships.

BSF is committed to ensuring that our supplier(s) do not include anyone engaged in human trafficking or any form of slavery. Many of our existing policies contain provisions which contribute to mitigating the risk of slavery and human trafficking taking place in any part of our business and supply chain including:

- Organizational code of conduct & business ethics
- Diversity policy
- Whistleblower protection policy
- Respectful workplace-harrasement preventions policy
- Occupational health and safety policy

Through our actions and policies, we are committed to maintaining a work environment which promotes and protects fundamental human rights. We acknowledge that we have an ongoing responsibility to ensure that appropriate measures are implemented to mitigate the risk of slavery and human trafficking in our operations, either directly or through our suppliers.

To that end, we expect our suppliers to ensure their activities and behaviours align with The Brenda Strafford Foundation's mission, vision and values which are:

Mission: As a charitable organization we are an innovative force, providing high quality person-centred care and services to optimize well-being and enrich people's lives.

Vision: Create a future where people can live life to the fullest, with dignity, hope and happiness — in caring and supportive communities.

Values:

- We put people at the centre of everything we do
- We believe in engagement with all stakeholders
- We act with compassion, empathy and understanding
- We boldly pursue quality and innovation with pride and enthusiasm

Date of Issue: May 31, 2024

Signature of Company Director



Clayton Sissons, Board Chair

## 1. INTRODUCTION

The Brenda Strafford Foundation (“BSF” or “Foundation”) is committed to supporting and respecting the protection of human rights and stands against all forms of modern slavery and forced labour.

This Report is produced by The BSF for the financial year ending March 31, 2024 (the “Reporting Period”) and sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Foundation. This report is pursuant to Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act.

## 2. STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

BSF is a registered Canadian charitable organization (# 105198873RR0001) based in Calgary, Alberta Canada working in the healthcare and social assistance sector. The objectives of the organization are:

- to promote health by operating nursing homes within Canada in accordance with the appropriate laws or regulations;
- to promote health by providing affected populations with health care services or products that prevent and manage serious threats to health and survival;
- to promote health by protecting and maintaining public health through the operation of eye care hospitals, health care clinics and the support of established medical centres outside Canada;
- to address and prevent specific problems faced by families by providing counselling and outreach programs to individuals affected by family violence;
- to establish and carry on the operation of medical clinics either within or outside Canada to provide care and facilities for the poor and needy; and
- to receive and maintain a fund or funds and to apply all or part of the principal and income therefrom from time to time, to qualified donees as defined by the Income Tax Act (Canada).

Currently the Foundation operates five care facilities within Calgary and its surrounding area, and a second-stage shelter for women and children escaping domestic violence in Calgary. Through the Foundation’s affiliates, the Foundation also supports health care in Haiti and Jamaica in areas in need of access to health care. The Foundation also supports other organizations in the Calgary area as well as several research initiatives in conjunction with partnerships.

The Foundation was incorporated as a corporation, with business number 105198873. For this reporting, the Foundation is considered an entity with at least \$20 million in assets, annual revenues of at least \$40 million, and employees at least 250 employees.

The Foundation's procurement of goods and services is primarily from third-party suppliers based in Canada. Other suppliers are based in the United States of America, Haiti, and Jamaica. Our suppliers provide a range of goods and services to the Foundation, such as food, medical supplies, medications, electronics, housing items, and building supplies.

### 3. POLICIES, TRAINING, AND DUE DILLIGENCE

Responsible business practices are imbedded into the Foundation's policies and management systems. On an ongoing basis, the Foundation gathers information on worker recruitment and maintains internal controls to ensure that all workers are recruited voluntarily, monitors suppliers for egregious acts of unethical business practices, including forced labour, and has grievance mechanisms in place for contracted suppliers, employees, and the general public to raise concerns about any of the Foundation's business practices.

BSF is committed to ensuring that our supplier(s) do not include anyone engaged in human trafficking or any form of slavery. Many of our existing policies contain provisions which contribute to mitigating the risk of slavery and human trafficking taking place in any part of our business and supply chain including:

- Organizational code of conduct & business ethics
- Diversity policy
- Whistleblower protection policy
- Respectful workplace-harassment preventions policy
- Occupational health and safety policy

Through our actions and policies, we are committed to maintaining a work environment which promotes and protects fundamental human rights. We acknowledge that we have an ongoing responsibility to ensure that appropriate measures are implemented to mitigate the risk of slavery and human trafficking in our operations, either directly or through our suppliers.

To that end, we expect our suppliers to ensure their activities and behaviours align with The Brenda Strafford Foundation's mission, vision and values which are:

**Mission:** As a charitable organization we are an innovative force, providing high quality person-centred care and services to optimize well-being and enrich people's lives.

**Vision:** Create a future where people can live life to the fullest, with dignity, hope and happiness — in caring and supportive communities.

**Values:** We put people at the centre of everything we do  
We believe in engagement with all stakeholders  
We act with compassion, empathy and understanding  
We boldly pursue quality and innovation with pride and enthusiasm

Employee training is an established activity within the Foundation. Annually, employees must commit to the Foundation's code of ethics. The opportunity to include training programs focused on preventing forced labour will be reviewed in Fiscal Year 2024-2025 as part of an overall review of the Foundation's ESG performance.

#### 4. RISK ASSESSMENT AND MANAGEMENT

The Foundation recognizes the potential for forced labour in the sourcing of raw materials and production for goods such as electronics, food, building materials, carpets, and garments; and in third-party services such as staffing agencies, and hospitality services.

The Foundation has started the process of identifying risks associated to forced labour but there may still be gaps in our assessments. Through the current assessment, the Foundation identified some potential risks of forced labour in its supply chains related to the supply chain in the health care and social assistance sector, and the accommodation and food services sector. Potential risks are related to the types of products produced, purchased or distributed, the locations of activities and operations, the types of products sourced, and the raw materials or commodities used in supply chains. In Fiscal Year 2024-2025 the Foundation will further assess risk as part of an overall review of Environment, Social, and Governance (ESG) performance.

#### 5. REMEDIATION

The Foundation's third-party Whistle-blower hotline provides a confidential and anonymous communication channel for anyone, both internal and external to the Foundation, to report concerns regarding ethical or legal matters without fear of retaliation. Clients of the Foundation can also raise concerns through various feedback channels across the Foundation such as anonymous feedback forms and surveys.

There were no reported inquiries or identified instances of forced labour or child labour in the Foundation's activities or supply chains. Therefore, no remediation actions occurred.

#### 6. ASSESSING EFFECTIVENESS

Responsible business practices are imbedded into the Foundation's policies and management systems. Establishing policies and procedures to assess the Foundation's effectiveness in ensuring that forced labour is not being used in the Foundation's activities and supply chains will be reviewed in Fiscal Year 2024-2025 as part of an overall review of the Foundation's ESG performance.

#### 7. ATTESTATION



## PREVENTING FORCED LABOUR REPORT 2023-24

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.

Tony Weeks

President and Chief Executive Officer

May 31, 2024

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I have the authority to bind The Brenda Strafford Foundation.