

Policy	Anti-Modern Slavery Policy
Policy Owner	People & Culture Team
Policy Authorized	Cory Minkhorst, Co-CEO
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Changes	

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1. Purpose

At John Brooks, we constant oppose all forms of slavery, servitude, forced labor, and human trafficking. Modern slavery includes practices such as forced labor, debt bondage, and human trafficking. We understand that this is a global issue, and we are committed to conducting our business in a manner that respects the rights and dignity of all individuals. This policy highlights our commitment to ensuring that there is no modern slavery within our business operations or our supply chains.

2. Policy Principles:

2.1. Zero Tolerance:

We maintain a zero-tolerance approach to modern slavery in all its forms and will take necessary steps to ensure that our operations and supply chains are free from such practices.

2.2. Compliance with Laws:

We pledge to act ethically and with integrity, ensuring compliance with all Canadian and international laws and regulations pertaining to modern slavery. We regularly review applicable laws and best practices to ensure compliance.

2.3. Due Diligence:

We will conduct regular risk assessments and due diligence on our business operations and supply chains, especially when partnering with new suppliers or entering new markets. This may include audits, site visits, and supplier questionnaires.

2.4. Awareness and Training:

We will educate our employees, suppliers, and partners on the risks of modern slavery, equipping them with the necessary tools and knowledge to identify and address potential concerns.

2.5. Reporting Mechanism:

We will establish and maintain an effective mechanism for employees and external stakeholders to report suspicions or evidence of modern slavery within our operations or supply chains, ensuring anonymity and protection for whistleblowers to the People & Culture team.

2.6. Remediation:

If any instances of modern slavery are identified within our operations or supply chains, we will take swift corrective action, including providing support for victims and reviewing the effectiveness of our preventive measures.

3. Implementation and Review:

3.1. Responsibilities:

The People & Culture team will oversee this policy's implementation, review, and reporting, with regular audits from third-party organizations to ensure objectivity, if applicable.

3.2. Review:

This policy will be reviewed annually, with interim revisions as necessary to respond to feedback, regulation changes, or emerging best practices.

3.3. Reporting:

John Brooks will produce an annual Modern Slavery Statement, outlining our actions and progress in ensuring our operations and supply chains are free from modern slavery.

4. Conclusion:

John Brooks understands that the fight against modern slavery is ongoing. Our commitment is unwavering, and we aspire to lead in our industry as a beacon of ethical and responsible business practices. Together with our employees, suppliers, and partners, we are dedicated to ensuring a world where the rights and dignity of every individual are upheld.

5. Point of Contact

For any queries or clarification related to this policy, please contact People & Culture team.

6. Discretionary

In case of any disagreement or exception, the final discretion will be of Cory Minkhorst, Co-CEO.

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