

### 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 BSF for the financial year ending March 31, 2025 (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 is incorporated, with business number 105198873. For purposes of this reporting exercise, 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 embedded 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 policies contain provisions which contribute to mitigating the risk of modern slavery and human trafficking taking place in any part of our business and supply chain including:

- Code of conduct and ethics
- Purchasing of Supplies and Services
- Whistle Blower Protection policy
- Respectful Workplace - Harassment Prevention policy
- 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.

Expenditures of Foundation funds must be made in accordance with the financial authority guidelines as approved by the Board and best practices to ensure that open, fair, transparent and accountable purchasing practices are undertaken. This includes all applicable legislation including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the Amendment to the Customs Tarriiff. Any BSF employee who procures goods and services must ensure that purchases are based on these principles.

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 Conduct and Ethics Policy, which includes a commitment to the prevention of forced and child labour.

During the reporting period, employee training focused on preventing forced labour and modern slavery was initiated at the Foundation. This included integration into general orientation for all new employees in Canada, specialized training for employees involved in procurement, via the Association of Anti-Money Laundering Specialists, and the creation of annual learning modules for all current employees in Canada, to be rolled out in Fiscal Year 2025-26.

#### 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 process of identifying risks associated with forced labour has been completed by the Foundation and it will continue to identify emerging risks. Currently, there are 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. During the reporting period, a detailed review of these risks was completed for solar energy project equipment, and medical supplies purchased from companies in the U.S.A. for activities in Haiti. The review confirmed that the suppliers used are committed to ethical business practices, including preventing forced and child labor, with some suppliers having certificates of compliance from external agencies such as Société Générale de Surveillance and Underwriters Laboratories.

#### 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.

During the reporting period, 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. The Foundation's Code of Conduct and Ethics policy is reviewed on a regular basis. The Foundation regularly tracks completion of employee sign off on the Foundation's Code of Conduct and Ethics policy, completion of general orientation, and completion of annual learning requirements, all which contain components about the prevention of forced or child labour. Additionally, on an ongoing basis, the Foundation gathers information on worker recruitment and maintains internal controls to ensure that all workers are recruited fairly, monitors suppliers for egregious acts of unethical business practices, including forced labour, and has grievance mechanisms in place for contracted suppliers, employees, and the public to raise concerns about any of the Foundation's business practices.

### 7. ATTESTATION

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Board Chair, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report.

Clayton Sissons

Board Chair

June, 19, 2025

A handwritten signature in blue ink, appearing to read "Clayton Sissons", is written over a horizontal line.

I have the authority to bind The Brenda Strafford Foundation.