

ROCANDA ENTERPRISES LTD. MODERN SLAVERY POLICY

1. PURPOSE

Rocanda Enterprises Ltd. (“**Rocanda**”) is dedicated to preventing and reducing the risk of the use of forced labour and child labour in its supply chain activities. By ensuring that our supply chain activities screen for and reduce the use of forced labour and child labour, we will not only be compliant with the Federal Government’s requirements enacted in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023* (also known as the “**Modern Slavery Act**”) but also it will advance our collective vision of providing safe and efficient service to our customers.

Our goal is to ensure that we put in place reasonable measures that will enhance due diligence in our supply chain activities, facilitate our legal reporting requirements, and ultimately help mitigate the risk of the use of forced labour and child labour in supply chains.

At Rocanda, we are opposed to all forms of forced labour and child labour in our supply chain activities. Through the adoption and implementation of this *Forced and Child Labour in Supply Chain Policy* (the “**Policy**”), we will use our best endeavours through our due diligence process and reporting obligations to ensure forced labour and child labour are avoided and/or reduced in the supply of the goods and services that we procure from our suppliers and that we provide to our clients.

2. OBJECTIVE

To ensure that Rocanda has adequate procedures in place to manage the risk of the use of Forced and Child Labour in its supply chain and can demonstrate compliance with the requirements of the Modern Slavery Act.

3. DEFINITION OF “FORCED LABOUR” AND “CHILD LABOUR”

Forced Labour

“Forced Labour” means labour or service provided or offered to be provided by a person under circumstances that:

- i) Could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- ii) Constitute forced or compulsory labour as defined in Article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

Child Labour

“Child labour” means labour or services provided or offered to be provided by persons under the age of 18 years and that:

- i) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- ii) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- iii) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- iv) constitute the worst forms of child labour as defined in Article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

4. KEY PRINCIPLES

Due Diligence

Rocanda shall implement a due diligence process by incorporating the questionnaire attached to this Policy as *Schedule “A”* to its tendering and bidding processes and procedures as part of its supplier evaluation process.

Training

Rocanda shall institute a training program and annual refresher for its employees engaged in the procurement process and shall communicate the Policy across its organization.

Enforcing Compliance

Suppliers must certify compliance by completing the *Supplier Certification of Compliance* form in Schedule “A”. Rocanda shall review the responses provided by a supplier, and where there is an indication of a violation, a potential violation or a gap in approach, suppliers shall work with Rocanda to resolve such violations, potential violations or gaps and suppliers shall undertake to take reasonable measures to comply with this Policy and the Modern Slavery Act.

Failure or violation by a supplier to comply with this Policy and the Modern Slavery Act may result in disciplinary actions up to and including termination of contracts and subsequent disqualification of certain products/services or as a supplier of Rocanda.

Annual Reporting

Every year, Rocanda will prepare an annual report (the “**Annual Report**”), which will contain:

- i) Rocanda’s organizational structure, activities, and supply chains;
- ii) Rocanda’s policies and due diligence processes in relation to forced labour and child labour;
- iii) a description of the parts of the business and supply chain that are exposed to the risk of the use of forced labour and/or child labour and the steps taken to assess and manage those risks;
- iv) measures taken to remediate any identified forced labour and/or child labour;
- v) measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour and/or child labour in Rocanda’s activities and supply chain;
- vi) training provided to employees on the requirements of this Policy and applicable law; and
- vii) a description of the process for assessing the effectiveness of this Policy.

Approval and Attestation of the Annual Report

The Annual Report must be approved by management.

The approval of the Annual Report shall be attested to by a designated member of management in the form attached to the Policy as *Schedule “B”*. The approved Annual Report shall be filed by the General Counsel and Company Secretary with the Minister of Public Safety and Emergency Preparedness by May 31st each year.

Accessibility of the Annual Report

A copy of the Annual Report shall be published on Rocanda’s website, as well as provided to any inquiring party.

5. RESPONSIBILITIES

Rocanda ownership, directors, and managers will oversee the incorporation of this Policy into Rocanda’s supply chain and procurement activities. Amendments will be made as seen fit and when guided by legislation. Additional actions may be taken when required to help Rocanda manage and mitigate risks associated with its operations, and to ensure compliance is maintained throughout the entire supply chain.