



## MODERN SLAVERY POLICY

### 1. PURPOSE

Access Communications Co-operative Limited (Access Communications) 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 Access Communications, 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 customers.

### 2. OBJECTIVE

To ensure that Access Communications 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) 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:

- iii) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- iv) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- v) 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
- vi) 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**

Access Communications 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**

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

### **Compliance Statement in Contracts**

Access Communications shall amend its contracting documents including its standard Master Services Agreement to include this statement: *“Contractor and Contractor Related Parties shall not engage in any behaviour related to slavery, unlawful child labour, exploitation of children, forced labour or human trafficking.”*

### **Enforcing Compliance**

Suppliers must certify compliance by completing the Supplier Certification of Compliance form in Schedule “A”. Access Communications 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 Access Communications 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 Access Communications.

### **Annual Reporting**

Every year, the Chief Financial Officer or their designee must prepare an annual report (the “**Annual Report**”), which must contain:

- i) Access Communications organizational structure, activities, and supply chains.
- ii) Access Communications 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 Access Communications 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 CFO is responsible for approving and providing attestation for the Annual Report. Subsequently, the Board of Directors will receive the Annual Report to ensure it has been appropriately approved and attested to.

The approved Annual Report shall be filed by the CFO’s Office 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 the Access Communications website.

## **5. RESPONSIBILITIES**

Composed entirely of independent board members, the Access Communications Corporate Board oversees fulfilling aspect of its mandate, and the Audit & Risk Committee and the Board will:

- viii) provides oversight for Access Communications policies, standards, disclosures, and compliance practices for modern slavery compliance.



- ix) review, monitor, and report to the Board on actions and initiatives undertaken by Access Communications to manage and mitigate risks.

The office of the Chief Financial Officer shall supervise the incorporation of this Policy into Access Communications supply chain processes and procedures.

## 6. REFERENCE DOCUMENTS

1. Fighting Against Forced Labour and Child Labour in Supply Chain Act, 2023
2. Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930
3. Child Labour Convention, 1999, adopted at Geneva on June 17, 1999

## 7. REVISION HISTORY



## **Modern Slavery Report 2023**

**The legal name of reporting entity:** Access Communications Co-operative Limited

**Financial reporting year:** 2023

**Business number:** 104452073

**Telecommunications Industry operates in Canada, Saskatchewan**

### **Our Commitment**

Access Communications Co-operative Limited (Access Communications) 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 Access Communications, 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 customers.

### **Structure, activities and supply chains**

Access Communications Co-operative Limited ("ACCL") is a non-profit organization which provides local community programming, television, internet, phone and security monitoring services. It serves over 235 communities and 200,000 sq. km of rural areas in the Province of Saskatchewan.

ACCL's mission is that we are a community-owned co-operative dedicated to providing exceptional communications and entertainment services and unique opportunities for local expression.

ACCL has approximately 300 employees within Saskatchewan.

ACCL's activities include delivering the above-mentioned services to customers in Saskatchewan. Given operations and activities are within Saskatchewan the risk of Forced Labour and Child Labour is low. That said, to fulfill operations ACCL sources materials and equipment primarily from



suppliers within North America. It is noted that some of our suppliers may source their goods from countries outside of North America.

## **Policies and due diligence processes**

Included in appendix 1 of this report is our policy regarding Modern Slavery. Access Communications has implemented a due diligence process by incorporating the modern slavery compliance questionnaire to its tendering and bidding processes and procedures as part of its supplier evaluation process.

Suppliers must certify compliance by completing the questionnaire. Access Communications reviews 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 Access Communications 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 Access Communications.

## **Forced labour and child labour risks**

ACCL has identified areas in our supply chains that carry a risk that forced labour or child labour could be being used. This is primarily with suppliers who have operations outside of North America. It is noted that ACCL is not aware of any instances of forced labour or child labour in our supply chain at the timing of filing this report.

## **Remediation measures**

As ACCL is not aware of any forced labour or child labour within its operations and supply chain, this section is not applicable.

## **Remediation of loss of income**

As ACCL is not aware of any forced labour or child labour within its operations and supply chain, this section is not applicable.

## **Training**

Access Communications institutes a training program and annual refresher for its employees engaged in the procurement process and shall communicate the Policy across its organization. The content of this training includes education regarding forced labour, child labour (Bill S-211) and related organizational processes and procedures. This training was developed internally.

## **Assessing effectiveness**



At the time of filing this report, ACCL has not taking any action to assess the effectiveness in preventing and reducing risks of forced labour and child labour in ACCL's supply chains. In future year's the assessment of effectiveness will be done by:

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

**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."

Full name: DERRICK THUE

Title: CFO

Date: May 22 2024

Signature: 

"I have the authority to bind Access Communications Co-operative Limited.

