



Modern Slavery Report

1. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) requires that certain businesses report the actions they have taken during the fiscal year to identify and address the risk of forced labour or child labour within their operations and supply chain. This is a joint report for Amica Senior Lifestyles Trust and certain of its controlled subsidiaries¹ for which have an obligation to report under the Act (collectively “Amica Senior Lifestyles”, “Amica”, “our”, “we”, or the “Company”).

This report covers the fiscal year ending December 31, 2025 and outlines the steps taken to identify, prevent and reduce the risk of forced and child labour in Amica’s business operations and supply chain.

On April 1, 2026, a transaction was completed involving the sale of all or substantially all of the assets of the Company. The portfolio comprised 38 operating and development-stage retirement residences across Ontario and British Columbia and was structured as a real estate transaction with a long-term operating arrangement. As a result of this transaction, further reporting under the Act for 2026 and subsequent years is not anticipated, as the Company is not expected to meet the applicable reporting thresholds.

2. Structure, activities and supply chain

Amica Senior Lifestyles is a leading developer, owner and operator of premium, private-pay retirement residences and employs over 4,000 employees in Canada. Amica offers independent living, assisted living and memory care lifestyle options. Established in 1996, Amica owns and operates 30-plus residences in British Columbia and Ontario with plans to continue expansion in select markets.

¹ Entities required to publish a report under the Act and therefore covered by this joint report are Amica Senior Lifestyles Inc., Amica Senior Lifestyles Management Partnership, Amica Senior Lifestyles Management Inc., Amica Credit Mills GP Inc., Amica Aurora Inc., Amica Glen Abbey Inc., Amica (Taunton) Inc., Amica Jubilee House Inc., Amica Arbutus Nanton Seniors Inc., Amica Arbutus Manor Inc., Amica Unionville Inc., Amica Bayview Gardens Inc., Amica Beechwood Village Inc., Amica Bronte Harbour Inc., Amica Dundas Inc., Amica Erin Mills Inc., Amica Lions Gate Inc., Amica Little Lake Inc., Amica London Inc., Amica Somerset House Inc., Amica Stoney Creek Inc., Amica Swan Lake Inc., Amica Whitby Inc., Amica Seniors Granville Inc., Amica Islington Village Inc., Amica Bronte Village Inc., Amica Balmoral Inc.

Amica currently conducts its business exclusively in Canada, which, according to the Global Slavery Index² has a low prevalence of forced labour and child labour.

Amica's supply chain involves purchasing a broad range of goods predominantly from national, regional and local suppliers. Our principal domestic supply chain includes suppliers of technology and other office equipment, software, medical and healthcare suppliers and food and beverage suppliers. In addition to its domestic supply chains, Amica imports a limited number of goods directly into Canada from international vendors. These imports include dementia dolls, puzzles, and other life enrichment items used in the delivery of care services and programming for memory care residents, as well as select construction materials, furniture, artwork, office supplies, and décor incorporated into the design of newly developed or recently renovated residences. The majority of these imports originate from suppliers located in the United States, the United Kingdom, and Western Europe. These jurisdictions are identified by the Global Slavery Index as having a relatively low prevalence of forced labour and child labour. In limited instances, certain lighting and fitting materials used in construction projects have been sourced from suppliers in China and/or India, which may present a higher inherent risk. In such cases, Amica relies on its third-party development partners to conduct appropriate due diligence and to ensure compliance with Amica's Vendor Code of Conduct. This includes adherence to standards intended to mitigate the risk of forced labour and child labour within the supply chain.

Amica aims to ensure that we only work with credible suppliers and contractors to limit the potential risk of forced labour and child labour within our business and supply chain.

3. Steps taken to prevent and reduce the risk of forced labour and child labour

In 2025, we took the following steps to prevent and reduce the risk of forced labour and child labour in our business operations and supply chains:

- (i) Integrated our Vendor Code of Conduct into our standard contracts and internal contracting guidelines;³
- (ii) Strengthened our due diligence by requiring vendors to formally acknowledge and commit to Amica's Vendor Code of Conduct in all material contracts;
- (iii) Introduced Request for Proposal Guidelines to ensure vendors meet ethical sourcing requirements before engagement;
- (iv) Continued to review our general compliance policies and procedures as well as third-party due diligence and/or oversight protocols and procedures to understand our current business practices and identify opportunities to enhance and improve controls, where relevant;
- (v) Refreshed existing due diligence on existing partners and suppliers where new investment and/or projects were initiated;

² Walk Free Global Slavery Index: <https://www.walkfree.org/global-slavery-index/>

³ Developed in 2023 and rolled out in 2024, the Amica Code of Conduct sets out Amica's fundamental ethical and business conduct expectations and requirements for our vendors, which includes, *inter alia*, the requirement to comply with applicable labour laws and regulations and the prohibition of the use of forced labour and child labour.

- (vi) Included compliance-related representation and warranties in agreements with third parties, including compliance with applicable laws; and
- (vii) Discussed with new employees the importance of the Vendor Code of Conduct and anti-slavery legislation as part of onboarding training and compliance.

4. Company policies and due diligence processes in relation to forced labour and child labour

Amica has a number of existing policies and processes which are relevant for mitigating the risk of forced labour and child labour. Our policies and controls are regularly reviewed and updated to ensure compliance with applicable laws and regulations as well as to adopt recommended best practices, where relevant.

(i) Code of Conduct

Amica's Code of Conduct addresses, among other things, compliance with laws, human rights, health and safety, privacy, violence prevention, discrimination and harassment, fair dealing with people and organizations and reporting violations. It highlights our commitment to carrying out our business activities in a manner that respects and supports the protection of human rights through the elimination of discrimination in employment and the prohibition of child and forced labour. All Amica employees must undertake mandatory training/review during the onboarding process and recertify their understanding and compliance with the Code of Conduct on an annual basis.

(ii) Whistleblowing Policy

Our Whistleblowing Policy encourages our employees, volunteers, contractors and other stakeholders to report suspected wrongdoing, which includes failure to comply with applicable laws and regulatory obligations, as soon as possible, in the knowledge that their concerns will be taken seriously, investigated promptly and that their confidentiality will be respected, consistent with adequate investigation and remediation. To support this, Amica offers a confidential reporting hotline for use by its employees, vendors, volunteers, contractors and other stakeholders that is managed by a third-party service provider.

(iii) Vendor Code of Conduct

Amica's [Vendor Code of Conduct](#) sets out our fundamental ethical and business conduct expectations and requirements for our vendors including provisions that specifically prohibit the use of forced labour and child labour. In 2025 we continued to evaluate, operationalize and implement policies and guidelines that served to increase the scope, application and impact of our Vendor Code of Conduct.

In addition to the policies specifically described above, Amica's compliance program also includes policies regarding health and safety, workplace violence and harassment, diversity and inclusion and zero tolerance for abuse and neglect, each of which provides further indirect protective and/or mitigative measures in possible situations of forced labour and child labour.

5. Risk assessment of Amica's supply chain and due diligence procedures and actions taken to address those risks

Amica conducts its operations primarily in Canada, which, according to the Global Slavery Index, has a relatively low prevalence of forced labour and child labour. However, Amica recognizes that its supply chain extends beyond Canada and may therefore present exposure to such risks, particularly in relation to goods and materials sourced from international vendors.

Amica's direct imports are principally sourced from suppliers located in the United States, the United Kingdom, and Western Europe, with more limited sourcing from India and China. While the majority of these jurisdictions are considered lower risk, certain regions may present a higher inherent risk of forced labour and child labour. To mitigate these risks, Amica continues to adopt, implement, and enhance procurement-related controls. These include incorporating contractual representations and acknowledgements from vendors and partners regarding compliance with applicable laws and standards related to forced labour and child labour within their operations and supply chains.

In addition, Amica has operationalized its Vendor Code of Conduct and Vendor Selection Guidelines, which are designed to support the identification, assessment, and mitigation of risks related to forced labour and child labour across its supply chain.

6. Measures taken to remediate any forced labour or child labour

In 2025, Amica has not identified any incident of forced labour or child labour in its activities or supply chains. Thus, Amica did not need to take any measures to remediate an incident of forced labour or child labour.

7. Remediation of loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chains

In 2025, Amica has not identified any incident of forced labour or child labour in its activities or supply chains. Thus, Amica did not need to take any measures to remediate the loss of income to vulnerable families.

8. Training provided to employees on forced labour and child labour

Understanding and complying with our Code of Conduct and associated policies is a priority and requirement for all employees at Amica. Our onboarding programs for our employees includes training on our Code of Conduct, our company values and a number of other compliance, human resources and care and safety policies. Once onboarded, employees are required to repeat and refresh this training on an annual basis and the programs are updated as laws change and the enterprise risk profile changes and our response to it evolves. Additionally, employees are required to recertify their understanding and compliance with the Code of Conduct on an annual basis.

In 2025, employees in roles with responsibilities related to procurement, vendor management, and supply chain oversight were briefed on the importance of Amica's Vendor Code of Conduct and applicable anti-slavery legislation as part of their onboarding and role-specific training.

9. Effectiveness assessments to ensure that forced labour and child labour are not being used in our business and supply chains


Amica recognizes that tackling forced labour and child labour requires a continuing year-on-year commitment and is committed to the ongoing review and alignment with the Act and industry best practices of our processes and policies to identify, reduce and prevent the risk of forced labour and child labour in our business and supply chains.

10. Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of the Trustee of Amica Senior Lifestyles Trust as a joint report of Amica Senior Lifestyles Trust and its subsidiaries listed therein for the financial year ended December 31, 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entities listed therein. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Amica

Per:  _____

Name: Imran Siddiqui

Title: Director

Date: May 6, 2025