



## **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 subsidiaries<sup>1</sup> 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, 2024 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.

### **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.

Amica currently conducts its business exclusively in Canada, which, according to the Global Slavery Index<sup>2</sup> 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 our domestic supply chains, there are a small number of items that Amica imports directly

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<sup>1</sup> 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.

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

into Canada from international vendors, including promotional and event products, dementia dolls and other life enrichment items that are used to deliver care services and programming to our memory care residents, as well as a selection of furniture, artwork, office supplies and décor accessories that have been incorporated into the design of our newer properties most recently developed and/or renovated. In each case, imports are almost exclusively from the United States, the United Kingdom and Western European vendors, each of which, according to the Global Slavery Index, have a low prevalence of forced labour and child labour.

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 2024, 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) Rolled out our Vendor Code of Conduct, which we developed in 2023, which 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;
- (ii) Strengthened our due diligence by requiring vendors to formally acknowledge and commit to Amica's Vendor Code of Conduct in contracts;
- (iii) Introduced Request for Proposal Guidelines to ensure vendors meet ethical sourcing requirements before engagement;
- (iv) Amended our existing Code of Conduct to reflect our commitment to anti-human trafficking;
- (v) Reviewed our Business Ethics controls and mitigants including whistleblower, investigations, and other general compliance policies and procedures as well as third-party due diligence and/or oversight protocols and procedures to understand our current business practice and identify opportunities to enhance and improve controls, where relevant;
- (vi) Refreshed existing due diligence on existing partners where new investment and/or projects were initiated;
- (vii) Included compliance-related representation and warranties in agreements with third parties, including compliance with applicable laws; and
- (viii) Discussed with new employees the importance of the Vendor Code of Conduct and anti-slavery legislation.

#### **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.

##### **(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 2024 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 particular, we implemented Vendor Selection Guidelines to ensure the appropriate consideration was given to vendor selection, including performing due diligence on potential vendors in order to reduce the risk of forced labour and child labour in our supply chain.

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 business in Canada, which, according to the Global Slavery Index, has a low prevalence of forced labour and child labour. However, we are aware that our supply chain is not exclusively Canadian and thus may present a risk of forced labour and child labour, particularly in respect to those items and supplies that we import directly from international vendors principally located in the United States, United Kingdom and Western Europe. In order to mitigate this risk, we continue to adopt, implement and augment procurement related measures such as incorporating

contractual representations and acknowledgements with partners and vendors regarding forced labour and child labour in their operations and supply chains. Amica also continues to operationalize its Vendor Code of Conduct and related Vendor Selection Guidelines to identify and mitigate the risk of forced labour and child labour in our supply chain.

Amica continually reviews our operations and supply chains to understand and appropriately mitigate modern slavery risks associated therewith.

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

In 2024, 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 2024, 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 2024, employees in relevant positions were briefed on the importance of Amica's Vendor Code of Conduct and 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 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, 2024.

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

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Name: Irene Chang Britt

Title: Board Chair

Date: May 27, 2025

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