



ANDERSON

www.grpanderson.com

ANDERSON GROUP INC.

Policy Surrounding the Prevention and Mitigation of Risks Related to Forced
Labor, Human Trafficking, and Other Forms of Modern Slavery

Version 1.0

2024.04.04



Table of Contents

1. INTRODUCTION	3
1.1 Policy Objective	3
2. Stance on Forced Labor, Human Trafficking, and Other Forms of Modern Slavery	3
2.1 Situation	3
2.2 Position.....	3
2.3 Acts Constituting an Offense and Thus Strictly Prohibited	3
3. Procedure in the Event of a Proven or Suspected Violation of this Policy	4
3.1 Situation	4
3.2 Actions to Take.....	4
4. Sanctions in Case of Violation of This Policy	4



1. INTRODUCTION

1.1 Policy Objective

This policy aims to establish and communicate the stance of Anderson Group Inc. ("Anderson") regarding forced labor, human trafficking, or any other form of modern slavery. It clarifies the acts that constitute an infraction and details the procedures to follow in the event of a suspected violation of these policies.

Scope and Applicability of this Policy

This policy applies to all internal members (employees, administrators, board members, interns, or volunteers) as well as external stakeholders to the organization (consultants, subcontractors, individuals, or organizations with short-term or long-term contractual obligations, such as third parties, suppliers, agencies, and partners), and any other person acting on behalf of Anderson ("representatives"). Internal members, external stakeholders, and representatives are required to read, understand, and adhere to all aspects of this policy.

2. Stance on Forced Labor, Human Trafficking, and Other Forms of Modern Slavery

2.1 Situation

In the normal course of its operations, Anderson may interact with suppliers located in countries experiencing crises and conflicts. Under such circumstances, the most vulnerable populations, particularly women and children, are at risk of becoming victims of mistreatment, forced labor, or human trafficking.

2.2 Position

Anderson does not tolerate forced labor, human trafficking, or any other form of modern slavery. These activities are serious violations of human rights and are subject to criminal offenses. Anderson's representatives must not engage in, support, or facilitate modern slavery. Anderson is also committed to preventing and detecting any suspected acts of this type of slavery, conducting thorough investigations, and reporting incidents to the relevant authorities as necessary.

2.3 Acts Constituting an Offense and Thus Strictly Prohibited

- ❖ Human trafficking, including the recruitment, harboring, transportation, or reception of people through the use of violence, deception, or coercion. Exploitation includes forced prostitution, forced labor, forced begging, enforced criminality, domestic servitude, forced marriage, and organ trafficking;
- ❖ Sexual activity in exchange for payment or in return for a job, goods, or services;
- ❖ Humiliating or degrading behavior, or any form of exploitation in exchange for payment or in return for a job, goods, or services;
- ❖ The use of forced labor, including any work or service that a person is compelled to perform against their will or under the threat of punishment;



- ❖ Acts that directly support or facilitate forced labor, human trafficking, or modern slavery, including:
 - The buying, selling, or trading of another human being;
 - Physical coercion or restriction of someone else's freedom of movement;
 - The destruction, concealment, or confiscation of someone's identification or immigration documents, or otherwise denying access to them;
 - Soliciting a person for employment or offering employment under false or fraudulent pretenses;
 - Failure to comply with housing and safety standards in force in the host country when providing or arranging accommodation;

3. Procedure in the Event of a Proven or Suspected Violation of this Policy

3.1 Situation

Any suspicion or allegation of forced labor, human trafficking, or other forms of modern slavery, any support or facilitation of forced labor or human trafficking, any failure to report such activities, or any other violation of this policy must be promptly reported and investigated.

3.2 Actions to Take

It is incumbent upon all representatives to respond swiftly while ensuring the anonymity and safety of whistleblowers. If you suspect a violation, report it to your supervisor or your contact person at Anderson. If you are uncomfortable speaking to your direct supervisor, share your concerns with another manager at your workplace. You can also send a confidential report by email to: RH@grpanderson.com.

4. Sanctions in Case of Violation of This Policy

In the event of a violation of this policy, whether by engaging in human trafficking, facilitating it, supporting it, or failing to report any suspicions, sanctions may include dismissal, termination of a contract or relationship with Anderson, as well as reporting to the authorities.

Patrice Desrochers, PDG

2024-04-30

Date