



# **Pattison Media Ltd.**

## **Modern Slavery Report – 2026**

**Reporting Period: January 1, 2025 – December 31, 2025**

**Submission Date: May 31, 2026**

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2025 to December 31, 2025 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”).

This Report is made on behalf of Pattison Media Ltd. (“PML”) and is not a joint report.

## I. Introduction

This report is prepared in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”) for the reporting period January 1, 2025 to December 31, 2025.

Pattison Media Ltd. (“PML”) is committed to maintaining ethical business practices and preventing the use of forced labour and child labour within its operations and supply chains. As a media organization operating across Canada, PML recognizes its responsibility to identify and mitigate risks and to promote respect for human rights throughout its procurement activities.

This report describes the steps taken by PML during the reporting period to assess and reduce these risks, as well as ongoing and planned initiatives to strengthen its approach.

## II. Structure, Activities and Supply Chains

PML is a corporation incorporated under the Canada Business Corporations Act and operates as a division of the Jim Pattison group of companies.

The organization is governed by an executive leadership team, supported by operational leaders and General Managers responsible for individual markets and business units.

PML operates in the broadcasting and digital media sector, including radio, television, digital publishing and marketing services. The organization employs over 600 employees across Western Canada.

### Supply Chains

PML’s supply chain consists primarily of suppliers providing goods required to support operations, including:

- Information technology hardware and related equipment
- Broadcast and telecommunications equipment
- Office supplies and consumables
- Promotional merchandise and marketing materials

PML maintains commercial relationships with approximately 1,200–1,500 suppliers, predominantly located in Canada and the United States.

While most suppliers operate in jurisdictions considered lower risk, certain goods (particularly manufactured products such as technology equipment and promotional items) may originate from global supply chains that carry elevated risks of forced labour or child labour.

### III. Governance and Oversight

Oversight of forced labour and child labour risks is provided by PML's executive leadership team, which is responsible for setting policy direction and ensuring appropriate risk management practices are implemented across the organization.

Operational responsibility for implementing these policies resides with procurement functions and General Managers, who oversee supplier selection, contracting and compliance within their respective areas.

Risk identification and mitigation activities are embedded into procurement processes. Issues identified through supplier engagement or internal review are escalated to senior leadership as appropriate.

PML also relies on established regulatory frameworks, industry standards and supplier engagement to inform its approach to identifying and managing risks in its supply chain.

### IV. Policies and Due Diligence

PML maintains a framework of policies that support ethical business conduct, including:

- Corporate Ethics Policy
- Whistleblower Policy
- Equity, Diversity and Inclusion Policy

In December 2025, PML implemented a formal Procurement Policy to strengthen governance, accountability, and ethical sourcing practices. The Procurement Policy

### GOVERNANCE STRUCTURE

Governance oversight is led by executive leadership, supported by procurement and operational management.



requires suppliers to adhere to human rights and labour standards, including prohibitions on forced labour and child labour. The policy has been rolled out across the organization, is applied to new vendors, and contractual terms are being updated upon renewal to reflect these requirements.

### Due Diligence Measures

PML’s due diligence approach includes:

- Conducting internal risk assessments of supply chain categories
- Performing supplier vetting and evaluation
- Incorporating contractual clauses requiring compliance with applicable labour laws and prohibiting forced labour and child labour
- Monitoring supplier relationships and performance over time
- Embedding responsible business conduct into organizational policies and management systems

Suppliers are expected to comply with legal and ethical standards and contractual requirements are being updated progressively as agreements are renewed to reflect these expectations.

### V. Risk Assessment & Management

PML has identified that its exposure to forced labour and child labour risk is primarily indirect and associated with global supply chains supporting procurement activities.

Higher-risk areas include:

- Information technology hardware and related components
- Promotional merchandise and marketing materials
- Office supplies and consumables

Additional areas of potential exposure include construction, maintenance and other services where subcontracted or migrant labour may be present.

Risks are assessed based on factors such as:

- Product type

### SUPPLIER RISK MATRIX

The matrix below summarizes inherent risk across key supplier categories based on industry factors and supply chain characteristics.

CATEGORY	RISK LEVEL	DRIVERS
 IT HARDWARE	 M MEDIUM	 Global manufacturing
 PROMOTIONAL MERCHANDISE	 M MEDIUM	 Higher-risk jurisdictions
 BROADCAST EQUIPMENT	 L-M LOW-MEDIUM	 Offshore components
 OFFICE SUPPLIES	 L-M LOW-MEDIUM	 Commodity goods
 CONSULTING	 L LOW	 Domestic services

- Country of origin
- Supplier relationships
- Industry exposure

PML mitigates these risks through supplier selection, contractual obligations, ongoing monitoring and maintaining long-term relationships with suppliers primarily located in lower-risk jurisdictions.

## VI. Remediation Measures

During the reporting period, PML did not identify any instances of forced labour or child labour in its activities or supply chains.

If such risks or instances were identified, PML would require suppliers to take appropriate corrective action. Where remediation is not achieved, PML would reassess or terminate the business relationship as appropriate.

## VII. Remediation of Loss of Income

PML did not identify any situations requiring measures to remediate the loss of income for vulnerable individuals or families resulting from actions taken to address forced labour or child labour.

## VIII. Training

While formal, dedicated training on forced labour and child labour risks was not implemented during the reporting period, the organization has identified this as an area for enhancement and is planning to develop targeted training tailored to procurement and supply chain management functions.

## IX. Assessing Effectiveness

PML has begun evaluating approaches to assessing the effectiveness of its efforts to prevent and reduce risks of forced labour and child labour.

Planned measures include:

- Developing key performance indicators related to supplier compliance and contractual protections
- Monitoring implementation of the Procurement Policy across the organization
- Reviewing supplier engagement processes and contractual coverage

At the time of this report, formal measurement processes are in development and will be implemented progressively.

## KEY PERFORMANCE INDICATORS (KPI)

We are exploring how to integrate key performance indicators into our approach to managing modern slavery risks. The examples below represent potential areas of focus.

POTENTIAL KPI AREA	PURPOSE / HOW WE MAY USE THEM
 <b>Supplier Coverage</b>	Helps us understand the extent to which suppliers are subject to our procurement policy and standards.
 <b>Contract Clauses (Ethical &amp; Compliance)</b>	Helps us assess how widely ethical and compliance clauses are included in supplier agreements.
 <b>Training &amp; Awareness</b>	Helps us evaluate awareness and training needs related to modern slavery risks within our organization.
 <b>Escalations &amp; Concerns</b>	Helps us monitor the effectiveness of our reporting channels and escalation processes.
 <b>Policy Adoption &amp; Integration</b>	Helps us track progress as we integrate our procurement policy and due diligence practices across the organization.
 <i>We recognize that our measurement approach will continue to evolve. We will refine and expand our KPIs as our data, systems and capabilities mature.</i>	

## X. Continuous Improvement and Future Actions

PML is committed to continuous improvement and has identified the following priorities:

### Short-term (next 12 months)

- Complete implementation of the Procurement Policy across all business units
- Introduce targeted training for employees engaged in procurement activities
- Expand supplier contractual requirements related to forced labour and child labour

### Medium-term

- Enhance supplier due diligence and monitoring processes
- Develop and track key performance indicators to measure effectiveness

- Increase visibility into supply chain sources for higher-risk goods

### Long-term

- Strengthen supply chain transparency and risk identification practices
- Integrate continuous improvement into governance and oversight processes
- Evaluate opportunities to align with evolving industry standards and regulatory expectations

### XI. Attestation

This Report was approved pursuant to Section 11(4)(a) of the Act and has been submitted to Public Safety Canada. This Report is also available on our company website at [www.pattisonmedia.com](http://www.pattisonmedia.com).

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in my capacity as President of PML, attest that I have reviewed the information contained in this Report for PML. 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 within this Report.

#### On behalf of Pattison Media Ltd.



Rod Schween

President

May 31, 2026

I have the authority to bind Pattison Media Ltd.