## Purpose

Roadtrek is committed to ethical business practices and to respecting human rights in our business operations and our relationships with our customers, suppliers and workforce. We prohibit the use, and are committed to the elimination of, modern slavery in all its forms. We expect our business partners and suppliers to adhere to the same standards and endeavor to use suppliers whose corporate values are consistent with our own.

## Scope

This policy applies to all of those who work for, or on behalf of Roadtrek, in any capacity including as an employee, executive, consultant, volunteer, supplier, vendor, third party representative or service provider. The Company expects its employees, contractors and vendors to work together to give effect to the principles set out in this Policy.

## Definitions

Modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom. It broadly includes serious exploitative practices including human trafficking, servitude, forced marriage, slavery, forced labour, child labour, debt bondage, deceptive recruiting for labour or services and other slavery-like practices. This criminal activity deprives victims of their liberty and usually involves financial and other exploitation.

## Production of Goods

Includes the manufacturing, growing, extracting and processing of goods.

## Act

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada).

## Child Labour

Refers to labour or services provided or offered to be provided by persons under the age of 18 years and that:

- Are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.
- Are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to them.
- 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
- 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, or child labour under any other applicable law.

### Forced Labour

Refers to labour or service provided or offered to be provided by a person under circumstances that:

- 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
- constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930, or that constitute forced labour under any other applicable law. Modern Slavery means collectively Forced Labour and Child Labour

## ROLES & RESPONSIBILITIES

Preventing, detecting, and reporting Modern Slavery is a shared responsibility between all employees. Each has a unique role to play as outlined below.

### Chief Executive Officer (CEO):

- Help create and lead an environment that is free from all forms of modern slavery from Roadtrek Inc. supply chain.
- Ensure this Modern Slavery policy is available and operating for the workplace.
- Ensure adequate time, resources and materials are available to implement this Modern Slavery policy.
- Work with the HR Manager to annually review the policy to determine any enhancements to help prevent all forms of Modern Slavery.
- Approve policies and practices that support the detection and removal of Modern Slavery from Roadtrek Inc. supply chain.
- Adhere to all requirements set out below for Workers.

### Human Resources (HR) Manager:

- Ensure all workers are informed about the requirements of Roadtrek's Modern Slavery Policy.
- Provide all new employees with a copy of this Policy as part of their orientation.
- Work with the CEO to review the Modern Slavery policy on an ongoing basis and post on the Communication Board.
- Work with the Head of Finance and CEO to investigate any complaints of breaches of this Policy.
- Monitor Roadtrek' s dedicated Whistleblower hotline.
- Adhere to all requirements set out below for Workers.

### Head of Finance:

- On behalf of the Company, work with the Purchasing Manager to meet all reporting obligations in accordance with the Act, including assisting to prepare and make publicly available and transparent reports, including prescribed information.
- Monitor Roadtrek' s dedicated Whistleblower hotline.
- Adhere to all requirements set out below for Workers.

**Purchasing Manager:**

- Will conduct a risk assessment and map our suppliers to determine if any risk of modern slavery exists within the business and supply chain.
- Vet new and existing suppliers for Modern Slavery risks through questionnaires, on-site inspections, audits (planned and unannounced) and other means.
- Will provide any new vendors, suppliers, buying representatives etc. with a copy of this policy upon acceptance of their business and on an annual basis thereafter as a refresher.
- Review and update terms and conditions in purchase orders that will require suppliers to refrain from using any form of Modern Slavery in their own supply chains.
- Responsibly source goods or services to use in its business.
- Ensure there is transparency in efforts taken within the company and its supply chains to tackle the issue of modern slavery.
- On behalf of the Company, work with the Head of Finance to meet all reporting obligations in accordance with the Act, including assisting to prepare and make publicly available and transparent reports, including prescribed information.
- Management and review of received questionnaires from vendors, suppliers, service providers etc.
- Adhere to all requirements set out below for Workers

**Managers & Supervisors:**

- Read, be informed and adhere to the requirements outlined in this Modern Slavery Policy.
- Ensure those reporting to them understand and comply with this Policy and are participating in any training that Roadtrek provides.
- Treat allegations of Modern Slavery seriously and refraining from dismissing or downplaying such allegations.
- Refrain from retaliating against anyone who reports concerns related to Modern Slavery.
- Adhere to all requirements set out below for Workers.

**Workers:**

- Comply with applicable laws and regulations about Modern Slavery including under the Act.
- Read, understand and follow this policy.
- Participate in training related to this policy.
- Avoid any activity that might lead to a potential or actual breach of this Policy, or relevant laws related to Modern Slavery.

- Seek and follow advise from their supervisor or manager if they have a question about Modern Slavery.
- Report any risks of Modern Slavery they identify in Roadtrek Inc.'s business or supply chains.
- Cooperate with any investigation regard the use of Modern Slavery in Roadtrek Inc's supply chain.
- Cooperate with any investigation about Modern Slavery complaints and concerns.

### Vendors/Suppliers/Consultants:

- Our expectation is for suppliers to uphold the highest standards of integrity, safety, ethical behavior, data privacy and intellectual property protection, including that suppliers prohibit the use of child labour and any form of forced or compulsory labour, including modern slavery, debt bondage, and human trafficking in their operations and supply chains.
- When requested, complete a supplier questionnaire and provide information on their operations and supply chains, whether there are any risks of modern slavery and what steps your business has taken or plans to take to identify and address any potential modern slavery.
- When requested provide your business's Modern Slavery policy (if you have one) or other relevant policies and procedures implemented in your business.

### Reporting Non-Compliance

Everyone is encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of Roadtrek Inc.'s business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the business, or any tier of the supply chains constitutes Modern Slavery, raise your concerns with your Supervisor, Manager or Human Resources who will support employees with reporting the matter.

### Whistleblower Hotline

This dedicated hotline is implemented to receive and investigate complaints regarding modern slavery and human rights matters as well as our internal operations. Suspected violations must be promptly reported to the CEO.

### Retaliation

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery is or may be taking place in any part of Roadtrek Inc.'s business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern.

## Breaches of this Policy

Any employee or contract worker who is found to have breached this Policy will face disciplinary action, which could result in termination of employment or engagement without notice or payment in lieu of notice.

*Suppliers:* We may withhold orders, request corrective actions, assess payment penalties, withhold funds, or terminate the relationship with other individuals and organizations working on Roadtrek Inc's' behalf if they breach this Policy or any requirements under the Act or other applicable legislation aimed at eliminating Modern Slavery.

## Compliance with Laws

This Policy is intended to comply with all applicable laws. In the event this Policy conflicts with applicable law in any way, the applicable law shall govern and supersede the conflicting portion of the Policy.

## REVISION & APPROVAL HISTORY:

| Rev. | Description of Change | Change By | Approved By | Issue Date |
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| A | Original Issue | | M. Miletto Petrazzini | September 2024 |