



FEBRUARY 2021

Copperleaf Slavery & Human Trafficking Policy



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1 Copperleaf Slavery & Human Trafficking Policy

1.1 Introduction

Copperleaf has a zero-tolerance approach to all forms of slavery and human trafficking and is committed to acting ethically and with integrity in all its activities. We have and will continue to implement systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our organisation.

We understand the term “slavery” to encompass servitude, forced labour, child labour, forced marriage and human trafficking. Human trafficking is defined as the action or practice of illegally transporting people from one country or area to another, typically for the purposes of forced labour or commercial sexual exploitation. Both slavery and trafficking are crimes and serious violations of fundamental human rights.

1.2 Scope of Policy

This Policy applies to all permanent and temporary employees of Copperleaf (including any of its intermediaries, subsidiaries or associated companies) as well as Copperleaf’s Board of Directors (“Associated Persons”). All employees and associated persons are expected to adhere to the principles set out in this Policy.

1.3 Legal Obligations

We are committed to meeting obligations under international legislation such as the 1948 Universal Declaration of Human Rights, the UK Modern Slavery Act 2015 and the USA Trafficking Victims Protection Act: 22 U.S.C. § 7101 as well as any other laws in Canada or other jurisdictions in which Copperleaf operates.

1.4 Policy Statement

Copperleaf expects that our employees, partners and suppliers will work with us to enforce the following policies:

- We have a zero-tolerance approach to slavery and human trafficking in our organisation and our supply chains.
- We take responsibility for the detection and reporting of slavery and human trafficking in any part of our organisation. Our employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will take appropriate action.

1.5 Responsibilities & Reporting Procedure (“Whistle-Blowing”)

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected slavery or human trafficking. The duty to prevent, detect and report any incident and any potential risks rests not only with the Leadership Team of Copperleaf but equally to all employees and Associated Persons.

Copperleaf encourages all employees and Associated Persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. Copperleaf is committed to taking appropriate action against slavery and human trafficking. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with Associated Persons.

Copperleaf will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in actions related to slavery or human trafficking, or because of reporting in good faith their suspicion that an actual or potential slavery or human trafficking offence has taken place or may take place in the future.

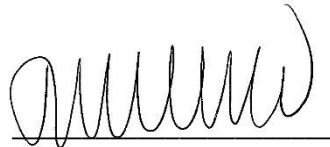
1.6 Monitoring Compliance

Copperleaf’s VP of Operations, Daryl Spencer, has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. The VP Operations will be responsible for monitoring compliance and will report any non-compliance in this regard to the Leadership Team of Copperleaf who have overall responsibility for ensuring this Policy complies with Copperleaf’s legal and ethical obligations.

1.7 Training

Training on this policy forms part of the orientation process for all new employees. All existing employees will receive relevant training on the details of this code upon its implementation. In addition, all employees will be asked to formally accept conformance to this code annually.

Signed by:

A handwritten signature in black ink, appearing to read 'Judi Hess', written over a horizontal line.

Judi Hess
Chief Executive Officer