



June 2022

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# Copperleaf Modern Slavery Statement

# Modern Slavery Act Transparency Statement 2022

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This statement is made in accordance with Section 54 of the *Modern Slavery Act* (U.K.) 2015 on behalf of Copperleaf Technologies Inc. and its subsidiaries.

## Our Organization

Copperleaf provides decision analytics software solutions to companies managing critical infrastructure. We leverage operational and financial data to empower our clients to make investment decisions that deliver the highest business value. We are currently helping organizations manage over \$2.6 trillion (CAD) of infrastructure globally.

Headquartered in Vancouver, Canada, our solutions are distributed and supported by regional staff and partners worldwide. What sets us apart is our commitment to providing extraordinary experiences, shaped by people who care deeply, products that deliver exceptional value, and partnerships that stand the test of time. Together, we are transforming how the world sees value.

We are committed to improving quality of life through maximizing our impact for our people, for clients and society. We put sustainable solutions and digital leadership at the heart of everything we do – through our products and projects, in our communities and in our work for clients, we enhance human experiences and foster personal, societal and business growth.

## Our Policies and Standards on Modern Slavery

Copperleaf's **Slavery & Human Trafficking Policy** articulates the Company's zero-tolerance approach to all forms of slavery and human trafficking and its commitment to acting ethically and with integrity in all of 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 organization.

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*, as well as any other laws in Canada or other jurisdictions in which Copperleaf operates.

Additionally, our **Code of Ethics and Business Conduct** sets out our Company's commitment to the highest standards of ethical conduct. The principles set out in our Slavery & Human Trafficking Policy and our Code of Ethics and Business Conduct are supported through our **Whistle Blowing Policy** which encourages all employees to raise any concerns or reports of conduct which might be in violation of the principles and standards set out in the Slavery & Human Trafficking Policy of the Code of Ethics and Business Conduct.

## Risk Assessment

Due to the nature of our products and associated professional services, we believe the risk associated with slavery and human trafficking within our business is relatively low. However, we acknowledge that



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the key risk areas regarding slavery and human trafficking lies within:

- Our supply chain; and
- Our recruitment processes.

We manage these risk areas through the procedures referred to within this Statement.

## Our Supply Chain

Our zero-tolerance approach to slavery and human trafficking extends to our supply chain. Our Slavery & Human Trafficking Policy sets out our commitment to take appropriate action in respect of a breach of our policy by any organization working on our behalf or which is providing Copperleaf goods or services. Our supply chain is made of professional services organizations, such as consultants, and business operational support, such as suppliers who provide goods or services that enable our business to function. When negotiating the terms under which we receive goods or services for third parties, we ensure that our suppliers will conduct themselves in accordance with our Company policies, including, but not limited to our Slavery & Human Trafficking Policy and our Code of Business Conduct and Ethics.

## Our Recruitment Processes

To manage the risks associated with our recruitment processes, our approach includes, where possible, an interview process which is carried out in person, but at a minimum a video interview with the hiring manager. We conduct an extensive reference review prior to any hiring, which is designed, among other reasons, to ensure compliance with our Slavery & Human Trafficking Policy and human rights and other applicable legislation. This process is designed not only to ensure that prospective employees share our values and behaviors and have the necessary competence, but also that they have applied to work with us of their own free will.

## Reporting

Our Slavery & Human Trafficking Policy places a duty and responsibility upon all employees and our Board of Directors to prevent, detect and report any suspected slavery or human trafficking.

To support those commitments, we maintain a confidential reporting system line through which integrity issues can be reported anonymously. We have in place a Whistle Blowing Policy, which outlines how the Company will respond and take action in respect of allegations of conduct which is in breach of our commitment to ethical conduct and compliance with our Code of Business Conduct and Ethics. Copies of the Whistle Blowing Policy, and the contact details by which employees are able to submit concerns or report anonymously, are made available to all employees. All issues reported through the reporting line are followed up with by the Vice President, Legal or the Audit Committee of the Board of Directors as appropriate.

## Measuring Effectiveness

As the risk of slavery and trafficking occurring in our business is low, we normally monitor our suppliers through our robust onboarding procedures, project auditing, and through the supply chain feedback. There have been no issues as of the date of this statement raised internally or externally relating to modern slavery.



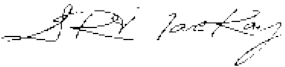
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## Training for Staff

We train all our employees on an on-going basis on our commitment to ethics and integrity and the terms of our Code of Ethics and Business Conduct and the Company's Slavery & Human Trafficking Policy.

Approved by: Sandra R. MacKay, Vice President, Legal & Corporate Secretary  
June 2022



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Sandra R. MacKay



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