

## 2023 MODERN SLAVERY STATEMENT

AVENIR GLOBAL is committed to conducting its business with the highest ethical standards and integrity. We recognize our responsibility to raise awareness and uphold human rights across all aspects of our business operations and in our supply chains.

This statement is made pursuant to section 54 of the United Kingdom's *Modern Slavery Act 2015* and section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. It outlines our policies and actions taken in the financial year ending on December 31, 2023, to prevent modern slavery and human trafficking in our businesses and supply chains.

This is a joint report covering the activities of AVENIR GLOBAL and its subsidiaries required to publish a report<sup>1</sup>.

### 1. OUR STRUCTURE AND SUPPLY CHAINS

#### a) Structure

AVENIR GLOBAL is a Montreal-based holding and management company of public relations and communications firms. AVENIR GLOBAL has 1,000 staff and offices in 23 locations across Canada, the U.S., Europe, and the Middle East, and ranks among the top 25 largest communication firms in the world.

In Canada, AVENIR GLOBAL owns NATIONAL Public Relations, the country's leading public relations firm, and Time & Space, a leading insights, media strategy, and execution agency. In the United States, AVENIR GLOBAL owns SHIFT Communications, a data-driven integrated communications agency; and the public relations and communication company Padilla, which includes the brand consultancy Joe Smith and the food and nutrition experts at FoodMinds. In Europe, AVENIR GLOBAL owns the London-based strategic communications consultancy Madano and Hanover, one of the leading strategic communications and public affairs consultancies in Europe and the Middle East, with offices in London, Brussels, Dublin, Dubai, Abu Dhabi, and Riyadh. The AVENIR GLOBAL network also includes healthcare specialists AXON, with offices in Toronto, the U.S., the U.K., and Europe, and healthcare creative agency Cherry, based in London.

In terms of geographical distribution, approximately 48% of our staff is located in Europe and the Middle East; 32% in Canada; and 20% in the United States.

#### b) Supply chains

Due to the nature of our business, we purchase goods and services from a range of sectors.

Our supply chains can be broken down into 8 main categories, which include:

- Financial services (banking, commercial insurance, etc.)
- Office operations (lease, furniture, equipment, maintenance, courier, caterers, etc.)
- Professional services (legal, IT, recruitment, consulting, etc.)
- IT software and hardware (technological equipment, operating systems, ERP software, etc.)
- Client operations (media purchasing, publishing, printing, event planning, etc.)
- HR operations (group insurance, employee benefits programs, training, etc.)
- Business development (accommodation, transportation, restaurants, etc.)
- Freelancers for client work (translators, writers, designers, developers, etc.)

<sup>1</sup> Entities required to publish a report and therefore covered by this joint report are:

- NATIONAL Public Relations Inc. under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*; and
- Madano Partnership Limited under the United Kingdom's *Modern Slavery Act 2015*

## **2. OUR POLICIES AND VALUES**

AVENIR GLOBAL is firmly engaged in respecting the human rights of all our employees and those within our supply chain and has zero tolerance for human rights violations, and we expect our suppliers to have the same high standards as we impose on our businesses.

All of AVENIR GLOBAL's policies and procedures are based on our Code of conduct, which has been adopted by each of our brands. The principles outlined in this Code of conduct are rooted in our core values of Quality, Innovation, Respect, Collaboration, Integrity, Responsibility, and Commitment. They represent the standards for behavior that our stakeholders can expect from each of us, in our multiple roles of employer, supplier, partner, client, and global corporate citizen.

Our Code of conduct clearly states that we commit to respect local, national, and any other laws with an international reach in the markets where we operate, as well as all applicable industry and lobbying codes of conduct.

The Code of conduct is distributed to all new employees of AVENIR GLOBAL and is available for reference on our global intranet.

In order to strengthen our commitment to combat modern slavery, we are currently working on implementing additional policies to ensure that our employees and business partners are equally committed to this goal. This includes:

- Establishing a global policy statement specific to modern slavery and human trafficking
- Introducing a version of our Code of conduct intended for our suppliers and partners to outline the commitments we expect from them.

## **3. RISK ASSESSMENT**

Due to the nature of our business and supply chains, we consider the inherent risk of modern slavery and human trafficking occurring to be low.

Nonetheless, we take our responsibility to identify and effectively respond to any incidents or concerns very seriously. We acknowledge the evolving and complex nature of modern slavery and that our visibility on the risks for vendors further down the supply chain is limited.

The vast majority of the goods and services we purchase are procured in the countries where we operate, Canada, the United Kingdom, Denmark, Ireland, Belgium, and the United States, where we believe the risk of forced labour or child labour is limited.

We acknowledge that some of the countries where we operate in the Middle East, specifically Saudi Arabia and the United Arab Emirates, are more vulnerable to modern slavery and that greater caution should be exercised when selecting business partners and suppliers in these regions. However, we view our risk exposure as being minimal given the nature of our operations and supply chains.

## **4. DUE DILIGENCE PROCESS**

As part of our due diligence process, we have conducted an initial analysis of our current list of vendors to develop a greater understanding of the structure of our supply chains.

We recognize that we have an opportunity to strengthen our evaluation of our current and future vendors to ensure they are compliant with modern slavery regulations.

To this end, we are committing to continue improving our vetting process for our supply chain by including the following steps:

- Discuss with some of our more significant vendors to better understand their approach to compliance with modern slavery legislation; or
- Require vendors to certify their compliance with the standards set out in our Code of conduct.

## 5. TRAINING ON MODERN SLAVERY AND TRAFFICKING

We continue to strengthen employee awareness of our stance on slavery and human trafficking.

In 2024, we will be implementing a new, mandatory e-learning course (*Modern slavery and human trafficking*, via third-party provider NAVEX) for all current employees and new starters. This course will aim to help employees understand what modern slavery is, recognize the warning signs, and minimize risk when working with third parties.

## 6. KEY PERFORMANCE INDICATORS

We continue to review our policies and procedures related to modern slavery. In addition, we are aiming to audit the top 10% of suppliers for each of our brands to verify their compliance with modern slavery legislation, with a greater focus on markets where the prevalence of modern slavery is higher.

We also aim to have 100% of current and future employees complete the training on modern slavery by the end of 2024.

## 7. REMEDIATION OF FORCED AND CHILD LABOUR AND LOSS OF INCOME

Based on our assessment of our activities and supply chain, there were no measures taken to remediate the loss of income to the most vulnerable families given that there were no instances of modern slavery identified in our operations or supply chain.

## 8. APPROVAL

This statement was approved by the Board of Directors of AVENIR GLOBAL, pursuant to section 54 of the United Kingdom's *Modern Slavery Act 2015* and section 11(4)(b)(ii) of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. 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 Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, for the reporting year listed above.

I have the authority to bind AVENIR GLOBAL and its subsidiaries required to publish a report pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.



Name: Valérie Beauregard  
Position: Executive Vice-President  
May 27, 2024