

GDI GROUP OF COMPANIES

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT



1. OUR ORGANIZATION AND SUPPLY CHAIN

GDI Integrated Facility Services Inc. and its subsidiaries, collectively “GDIGC”, is a leading integrated commercial facility services provider offering its clients a full range of services, including commercial janitorial, building maintenance, installation, maintenance and repair of HVAC, mechanical, electrical and building automation systems, as well as other complementary services such as janitorial equipment distribution and products manufacturing.

2. INTRODUCTION

This statement constitutes our Modern Slavery and Human Trafficking Statement and sets out the steps that we have taken to ensure that modern slavery and human trafficking are not taking place within our business. The information in this statement is correct as of the date of publication.

3. OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING

GDIGC believes that modern slavery is a crime and a human rights violation. Our employees are critical to our success, and we are committed to operating free from forced labor, slavery, and human trafficking. We do not tolerate forced labor, slavery, or human trafficking in any form, in any part of our business or supply chain. Our Code of Ethics reflects our adherence to ethical standards and commitment to do the right thing wherever we do business and makes clear that “we will not tolerate human trafficking or forced labor in any part of our business activities or anywhere within our supply chain.” We reinforce the requirements of our Code of Ethics through our internal policies and procedures to ensure that our employees and supply chain partners are conducting business in an ethical and transparent manner. These policies and procedures include:

- **Equal Opportunities** – We have a range of policies and controls to ensure all employees are treated fairly and equitably and have equal employment opportunity.
- **Supply Chain** – All GDIGC vendors are subject to our Vendor Code of Conduct and contractual requirements to ensure compliance with anti-slavery legal obligations.
- **Code of Ethics Hotline** – We offer a confidential Code of Ethics hotline so that individuals can raise concerns about how people are being treated, or about practices within our business or supply chain, without fear of reprisals.

4. RISK ASSESSMENT AND DUE DILIGENCE

GDIGC has taken steps to minimize the risk of modern slavery by assigning responsibility for addressing slavery and human trafficking to the board, director, and senior manager levels. In addition, to uncover and prevent forced labor in our own workforce we routinely perform several assessments, including systematically checking bank accounts to identify unrelated workers paid into a single account, checking contact information provided by

employees to review if multiple matches occur, and checking emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number.

GDIGC also conducts varying levels of due diligence on our business partners depending on our assessment of the potential risk presented by that relationship. Beginning in 2021, all our suppliers are required to sign off on our Vendor Code of Conduct, which makes clear that specifically “we will not tolerate human trafficking or forced labor in any part of our business activities or anywhere within our supply chain.” In addition, as part of our new contracts with each supplier, we will require that they confirm to us that:

- ✓ They have taken steps to eradicate modern slavery within their business;
- ✓ They hold their own suppliers to account over modern slavery;
- ✓ They pay their employees at least the national/prevaling minimum wage; and
- ✓ We may terminate their contract at any time should any instances of modern slavery come to light.

5. TRAINING

We conduct training for all management on how to spot risks of modern slavery and human trafficking and how to report concerns. We also train our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

6. OUR PERFORMANCE INDICATORS

The steps that we are taking to ensure that slavery and human trafficking are not taking place within our business or supply chain will be effective if:

- ✓ No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified; and
- ✓ We maintain good levels of communication and personal contact with our supply chain partners;
- ✓ And confirm their understanding and compliance with our expectations.

7. TRAINING

Ethical or legal concerns regarding GDIGC or our suppliers can be made 24 hours a day, 7 days a week, via:

- ✓ online GDIGC Code of Ethics hotline or www.clearviewconnects.ca
- ✓ phone at **(844) 252-1768**
- ✓ post by sending a letter to: **P.O. Box 11017, Toronto, ON M1E 1N0**