



DOCUMENT TITLE	Modern Slavery Policy	EFFECTIVE DATE	2024-11-01	
DOCUMENT NUMBER	HR-POL-15	REVISION NO.	00	
DOCUMENT OWNER	Human Resources & Asset Management	REVISION DATE	YYYY-MM-DD	

1. POLICY STATEMENT

QM Environmental, as a leading Canadian environmental and industrial services company, is dedicated to maintaining the highest ethical standards in all business operations. This Modern Slavery Policy outlines our commitment to combat modern slavery, including slavery, servitude, forced and compulsory labor, and human trafficking.

QM Environmental is committed to:

- **Preventing Modern Slavery:** Ensuring that modern slavery does not occur within our operations or supply chains. We recognize that modern slavery is a crime and a violation of fundamental human rights.
- **Upholding Human Rights:** Promoting and protecting the human rights of all individuals involved in our operations and supply chains, aligning with our core values of respect, integrity, and ethical business practices.
- **Compliance with Laws and Regulations** - All employees, suppliers, contractors, and partners must comply with applicable laws and regulations related to modern slavery. This includes adherence to international labor standards and human rights conventions.
- **Prohibition of Modern Slavery and Forced Labor**
 - **Zero-Tolerance Policy:** QM Environmental maintains a zero-tolerance policy towards modern slavery and forced labor. This applies to all forms of modern slavery, including but not limited to forced labor, debt bondage, and human trafficking.
 - **Fair Treatment:** All employees, contractors, and agents must be treated fairly and with respect for their human rights and dignity. This includes ensuring fair wages, safe working conditions, and freedom of association.
- **Supply Chain Transparency**
 - **Due Diligence:** Implement measures to ensure transparency and traceability within our supply chain, including due diligence on suppliers to identify and address potential risks of modern slavery and forced labor. This involves thorough vetting of suppliers and regular assessments of their practices.
 - All suppliers, vendors and subcontractors will be required to review and certify that their practices are in accordance with this policy. Current suppliers will have 90 days from the launch of this program to complete the attestation. New suppliers will be required to attest prior to the issue of a Purchase Order or RFQ.
- **Risk Assessment:** Regularly assess and address risks related to modern slavery within our supply chain. This includes evaluating high-risk sectors and geographical areas and implementing mitigation strategies.
- **Reporting Obligations**
 - **Incident Reporting:** Promptly report any suspicions, incidents, or violations of modern slavery or forced labor to QM Environmental's compliance officer. We will establish clear reporting channels and protect whistleblowers from retaliation. Any reports of suspected violations of this policy may be reported to the Vice President, Human Resources, via email at Jasmyn.kozlowsky@gmenv.com or employees may also report via the Whistleblower portal.
 - **Cooperation:** Fully cooperate in any investigation related to modern slavery incidents or allegations.

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This includes providing all necessary information and access to relevant personnel.

- **Audits and Inspections**

- Right to Audit: QM Environmental reserves the right to conduct audits, inspections, and assessments to verify compliance with this policy. These may be announced or unannounced and conducted by internal teams or third-party auditors.
- Access to Information: Suppliers, contractors, and partners must provide access to relevant records, documents, and facilities as required for compliance verification. This includes employment records, payroll information, and worker interviews.

- **Consequences of Non-Compliance**

- Termination of Relationships: Non-compliance with this policy or any related laws may result in the immediate termination of business relationships with QM Environmental. This applies to both suppliers and employees.
- Legal Actions: Non-compliance may also lead to legal actions as prescribed under applicable laws, including potential fines and criminal charges.

- **Continuous Improvement**

- Policy Review: Regularly review and update this policy to ensure its effectiveness and alignment with current laws and best practices. This will be done annually or more frequently if required.
- Stakeholder Engagement: Engage with stakeholders, including employees, suppliers, customers, and NGOs, to improve our practices and address any concerns related to modern slavery.

2. SCOPE

This policy applies to all employees, suppliers, subcontractors, and partners across our operations in Canada.

3. FREQUENCY

This policy will be reviewed on an annual basis and revised as necessary.

4. RESPONSIBILITIES

Vice President, Human Resources


- To review and ensure the policy meets or exceeds all required legislative requirements
- To ensure all employees are trained and aware of the policy and of the importance in recognizing and preventing modern slavery
- To follow up on all reports of suspected acts of human trafficking or modern slavery

Director, Asset Management

- To ensure all suppliers, vendors and subcontractors are aware of this policy and have agreed to follow both our Modern Slavery attestation and our Supplier Code of Conduct
- To review and ensure this policy meets or exceeds all legislative requirements
- To follow up on all reports of suspected acts of human trafficking or modern slavery

Employees

- To review and understand this policy
- To participate in all company mandated training relating to modern slavery
- To recognize and report any suspected acts of modern slavery

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Vendors, Subcontractors & Partners

- By conducting business with QM Environmental, all vendors, subcontractors, and partners acknowledge and commit to upholding the principles outlined in this policy. This commitment extends to their own operations and supply chains.
- To acknowledge and agree to sign off on the QM Modern Slavery attestation.
- All vendors and subcontractors will be required to review and certify that their practices are in accordance with this policy. Current suppliers will have 90 days from the launch of this program to complete the attestation. New suppliers will be required to attest prior to the issue of a Purchase Order or RFQ.
- Any reports of suspected violations of this policy may be reported to the Vice President, Human Resources, via email at Jasmyn.kozlowsky@qmenv.com .
- Should any vendor or subcontractor have a question regarding the policy, questions will be directed to Mitchell Mailvaganam at Mitchell.mailvaganam@qmenv.com
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5. COMMUNICATION, TRAINING & AWARENESS

- Employee Training: Provide regular training to employees on recognizing and preventing modern slavery. This includes role-specific training for procurement, human resources, and management teams.
- Supplier Education: Educate suppliers, contractors, and partners on modern slavery risks and our compliance requirements. All suppliers, vendors and subcontractors will be required to read and acknowledge our Supplier Code of Conduct and our Supplier Modern Slavery Attestation. This policy will be communicated to all employees, suppliers, contractors and partners upon policy launch as well as any time a new stakeholder partners with QM Environmental for the first time.
- A copy of this policy will be posted on the company website and intranet
- A copy of this policy and the Supplier Attestation will be posted on the vendor portal

6. RELATED POLICY & PROCESS

- Whistleblower Policy
- Supplier Code of Conduct
- Employee Code of Conduct

7. FORMS

- Vendor & Subcontractor Attestation (AM-F-01-01)

8. RECORDS


- Record of Acknowledgement of Vendor & Subcontractor Attestation on QM Vendor Portal

9. DEFINITIONS

- NA

10. REVIEW/REVISION HISTORY

Date	Description	Revision
Initial Release	<ul style="list-style-type: none"> • Initial release of policy 	00
	<ul style="list-style-type: none"> • 	

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11. APPROVAL

Jasmyn Kozlowsky

 VICE PRESIDENT, HUMAN RESOURCES

2024-11-01

 DATE




 Jasmyn Kozlowsky (Nov 8, 2024 13:43 EST)
 SIGNATURE

Mitch Mailvaganam

 DIRECTOR, ASSET MANAGEMENT

2024-11-01

 DATE



 SIGNATURE

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