

Pattison



**Pattison ID, A Division of Jim Pattison Industries Ltd.**

**Modern Slavery Report 2025**

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2025 to December 31, 2025 and has been prepared in compliance with Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (Canada) (the “Act”).

This **third** Report is made on behalf of **Pattison ID, A Division of Jim Pattison Industries Ltd. (“Pattison ID”)** and is not a joint report.

## **I. INTRODUCTION**

As a prominent player in the physical and digital branding industry, Pattison ID acknowledges the critical role it has in ensuring the supply chains supporting its operations and products adhere to the highest ethical standards. This includes the prevention and identification of forced labour and child labour throughout its supply chain. Forced labour and child labour, as defined in the relevant legislation, are unacceptable crimes and serious violations of human rights. Pattison ID is committed to taking proactive and risk-based steps to prevent, identify, and address these issues within its operations and supply chain.

### 2025 Progress Summary

During the 2025 reporting period, Pattison ID continued to strengthen its approach to identifying, preventing, and reducing the risk of forced labour and child labour in its operations and supply chain. Key activities included incorporating the Supplier Code of Conduct into the new vendor onboarding package, onboarding more than 25 new vendors or subcontractors using the updated package, continuing subcontractor vetting and supplier performance monitoring, and further integrating supplier risk considerations into Corporate Services' broader compliance, ESG, and enterprise risk management activities.

Pattison ID also identified opportunities for further improvement, including enhanced supplier coverage tracking, targeted training, risk-based supplier monitoring, and development of a broader subcontractor audit process.

## **II. CORPORATE OVERVIEW AND SUPPLY CHAINS**

### Reporting Content

#### *Corporate structure*

Pattison ID is a physical branding and identification company which helps its customers deploy their identity for maximum consistency, engagement and impact across physical and digital signage, and branded environments. Pattison ID is a Division of Jim Pattison Industries Ltd., which is wholly owned by the Jim Pattison Group, with a head office located at Suite 1800 - 1067 West Cordova St. Vancouver, British Columbia.

Pattison ID operates across North America under three other corporate entities: Pattison Sign Group Inc. in the United States, Anuncios Pattison SA de CV in Mexico, and Pattison Sign de Puerto Rico, Inc. in Puerto Rico. Pattison ID operates its business across all four (4) entities, with a significant majority of the business activities in the United States and Canada.

#### *Business assets and operations*

The business operations of Pattison ID include mainly manufacturing signage, and other brand identification products in its manufacturing facilities in Canada and the US. It operates three (3) manufacturing plants in Canada and three (3) in

the United States. The Jim Pattison Group owns all three (3) manufacturing plants in Canada and rents the buildings for all three (3) U.S. plants. In addition to the manufacturing facilities, Pattison ID also has six (6) Sales and Operation offices, all of which are rented from third parties. With approximately 1000 employees spread across these facilities, Pattison ID is a leader in the physical identification industry. See our website at [www.pattisonid.com](http://www.pattisonid.com).

Pattison ID has a centralized functional structure whereby all sections of the operations across all borders report eventually to one person. The President of Pattison ID is responsible for all operations of the company across all borders. In the reporting year, he had five (5) Senior Executive team members who report to him: The Chief Relationship Officer (“CRO”), Chief Operations Officer (“COO”), Chief Financial Officer (“CFO”), Chief Employee Experience Officer (“CXO”) and Senior VP, Corporate Services & Sustainability (“SVPCS”). Under this structure, all sales and customer support teams report to the CRO; all operations, including manufacturing, report to the COO; all financial reporting and analysis, along with purchasing and strategic sourcing, reports to the CFO; all HR and communications report to the CXO; and all legal, risk management and sustainability matters report to the SVPCS.

Pattison ID has a Canadian headquarters in Pickering, Ontario and an American headquarters in Knoxville, TN.

Pattison ID produces tangible goods through the manufacture of signage and other brand identification products in Canada and the United States. Pattison ID also procures raw materials, components, outsourced finished goods, and related goods used in the manufacture, distribution, installation, service, and maintenance of its products.

#### *Supply chain*

Pattison ID has a very strong, long-standing relationship with its supply chain partners. Leveraging its scale, centralized procurement team and risk management strategies, Pattison ID collaborates with suppliers on contingency planning to achieve continuous supply and competitive, predictable costs over the long term. This collaborative approach allows Pattison ID to adjust order patterns and inventory to ensure no disruptions to our customers’ project timelines.

#### Procurement and strategic sourcing by the numbers:

- Total procurement spend for previous three financial years:
  - 2023: \$189 Million (CAD\$)
  - 2024: \$228 Million (CAD\$)
  - 2025: \$235 Million (CAD\$)
- Main categories of goods and services procured:
  - Installation services: Most of the products manufactured or procured by Pattison ID are installed by our network of installation subcontracting partners who are vetted to ensure they meet H&S

standards, installation capabilities to meet our installation protocol, and sufficient insurance coverage.

- Raw Materials: The major materials purchased include steel, aluminum, various plastics and vinyl substrates, LED illumination modules and power supplies, electronic message boards and LED screens.
  - Shipping: Once manufactured and ready to install, our facilities ship the finished goods to our installers using third party transportation partners.
  - Outsourced Finished Goods: Although most of Pattison ID products are manufactured in-house, it is sometimes necessary to outsource some specialty products which require external expertise, or sometimes large volume specialty sub-assemblies which can be manufactured more efficiently by third party partners.
  - Service and Maintenance: Similar to installation, most of Pattison ID's service and maintenance is provided by the network of subcontractors. The two areas where Pattison ID has its own installation and service crews are Dallas-Fort Worth and Greater Toronto areas.
  - Pattison ID's supply chain includes suppliers located in Canada, the United States, Mexico, Puerto Rico, and international jurisdictions. Pattison ID sources most of its products and services through North American supplier relationships, while certain assembled products, finished goods, components, and specialty products may be sourced from international suppliers, including suppliers located in Asia. Pattison ID recognizes that improving visibility into source countries and regions of origin, particularly for indirect suppliers and upstream raw materials, is an area for continued improvement.
- Total number of suppliers: 4,000
  - Total number of subcontractors: 1,000

### **III. POLICIES AND DUE DILIGENCE PROCESSES**

#### Reporting Content

##### *Policies*

Through the various policies listed below, Pattison ID communicates its values and expectations, setting a high bar for its employees and suppliers, and it makes clear it does not tolerate any forms of forced labour or child labour. Pattison ID is committed to evolving and improving its approach. It does not tolerate child, forced or bonded labour in any of its operations, or in the operations of its suppliers, subcontractors, and other business partners.

Pattison ID has several policies for its employees and suppliers related to Integrity and Ethics. These include:

- Anti-Bribery and Anti-Corruption Policy (August 8, 2016)
- Code of Conduct and Ethics (June 2021)
- Conflict of Interest Policy (August 8, 2016)
- Ethical and Moral Conduct Policy (August 8, 2016)
- Professionalism and Professional Ethics Policy (August 8, 2016) (employees only)
- Whistleblower Policy (as early as 2003) (employees only)
- Supplier Code of Conduct, incorporated into Pattison ID's new vendor onboarding package in fall 2025, setting minimum standards for vendor conduct, ethical behaviour, legal compliance, sustainability practices, human rights, and labour standards.

*Due Diligence in Supply Chain management to mitigate financial, social and/or environmental risks*

As was highlighted above, Pattison ID has several partner subcontractors and vendors. The following paragraphs explain how Pattison ID mitigates its financial, social and/or environmental risks in its supply chain.

#### Subcontractor and Vendor Vetting

Pattison ID's largest overall spend in the supply chain is with its over 1,000 installation and service subcontractors. Since the installer network performs the essential last step of installing the completed products at customer locations, ensuring we are partnering with professional, dependable and responsible partners is a high-level priority. Before being accepted within Pattison ID's network, all subcontractors must provide:

- Their capacities in equipment and workforce capacity
- Proof of liability and automobile insurance as per required minimums
- Agreement of confidentiality
- Agreement to abide by all Health & Safety Rules and Regulations of the local jurisdiction where they operate, Pattison ID's H&S Policy and any Customer specific H&S Policy

Once accepted into the network, a subcontractor may be approached by the Pattison ID project management team to provide services as per a Scope of Work (SOW) defined in a Purchase Order (PO). All POs we send to confirm the SOW have consistent terms and conditions embedded within them which allows Pattison ID to update its terms and conditions as needed without having to review each contractual relationship individually.

Also embedded in the POs are the Pattison ID H&S Policy and Installation protocol. The latter conveys clear instructions to all installation subcontractors on the safe way to complete the installation of the Pattison ID products.

During the reporting period, Pattison ID identified an opportunity to improve the consistency with which supplier-facing policies and expectations are communicated to vendors and subcontractors. In fall 2025, Pattison ID incorporated the Supplier Code of Conduct into its new vendor onboarding package. In early 2026, following the reporting period, Pattison ID further strengthened this control by updating its ERP-generated purchase order process so that purchase orders link to terms and conditions that reference and link to the Supplier Code of Conduct. By accepting a purchase order, the vendor or supplier acknowledges that it has read, understood, and agreed to the terms and conditions, including the Supplier Code of Conduct. This updated purchase order process applies to vendors receiving Pattison ID purchase orders across Pattison ID's operating jurisdictions, including international suppliers.

#### Due diligence to mitigate financial, social and/or environmental risks in supply chain

All subcontractors within the Pattison ID network can be hired by a Project Manager or Service Coordinator to perform installation, removal, service, maintenance, or repair work on Pattison ID products. As mentioned above, each project SOW is defined in a PO, which includes all relevant Terms and Conditions. Once the project SOW is completed, the Project Manager and/or Service Coordinator are required to evaluate the subcontractor on a 5-star system, along with specific constructive comments on what could be improved. The evaluation is based on the quality of the performance of work, the timeliness of the SOW, and whether any environmental or H&S issues were raised by the customer or any third party. The average evaluation score and comments are available to each Project Manager and Service Coordinator when deciding which subcontractor to use on a project.

Pattison ID's Director of Supplier Management and Strategic Sourcing meets with any subcontractors with any serious performance issues on one project, including any H&S, environmental or any other serious performance issues. Any matter where the subcontractor contravened Pattison ID's H&S policy or its commitment to the environment, or created a serious financial risk to the company, will lead to serious consequences up to and including removing them from the vetted network.

This process significantly reduces some of the financial, social and environmental risks to Pattison ID.

Within Pattison ID, Corporate Services has primary responsibility for coordinating Modern Slavery Act reporting and supporting the identification, assessment, escalation, and mitigation of forced labour and child labour risks. Strategic Sourcing, Operations, Finance, People & Communications, and Legal support this process through supplier onboarding, procurement controls, supplier performance monitoring, policy implementation, training, and escalation of concerns to leadership where appropriate.

## **IV. RISK ASSESSMENT AND MANAGEMENT**

### Likely highest risk of forced or child labour

Although only used under limited circumstances, Pattison ID orders some assembled products, and some finished goods from Asian partners, mainly in China.

Where Pattison ID engages overseas suppliers for assembled products or finished goods, Pattison ID may conduct facility visits before products are ordered and may revisit longer-term suppliers periodically. These visits are intended to assess supplier capability, quality, health and safety practices, and any observable concerns, including potential indicators of forced labour or child labour. Pattison ID recognizes that facility visits are one part of a broader risk-based due diligence approach and that additional formal assessment tools may further strengthen supplier oversight.

Pattison ID recognizes that its exposure to forced labour and/or child labour increases when it engages with suppliers who source goods or raw materials from countries where forced labour exploitation is known to occur. As such, Pattison ID follows a risk-based approach to its due diligence activities. Pattison ID's due diligence is prioritized to the most significant adverse impacts based on severity and the likelihood of harm and focus its attention and resources.

#### *Background checks of suppliers or vendors*

Based upon customer requirements, Pattison ID utilizes a third party to complete and maintain background checks on any individuals who will work on that customer's location.

#### *Pre-qualification or certification of suppliers or vendors*

As mentioned above, Pattison ID pre-qualifies all its subcontractors. During the vetting process all suppliers are made aware that safety is the overriding value of Pattison ID. In addition, they are informed that both Pattison ID and its partners have a mutual interest in protecting the environment, the safety of all customers, employees and the public, and all properties from damage.

#### *Contract provisions that include commitments related to Health, Safety, Employment and/or Environment*

Once onboarded, POs state in writing that there is a legal obligation to comply with all applicable laws and to conduct all activities in a safe and compliant manner. In early 2026, following the reporting period, Pattison ID further strengthened its ERP-generated PO process by linking vendors to terms and conditions that reference and link to the Supplier Code of Conduct.

Modern slavery risk is managed within Pattison ID's broader enterprise risk management framework. Corporate Services, in coordination with Strategic Sourcing, Operations, Finance, People & Communications, and Legal, monitors forced labour and child labour risk as part of supplier, compliance, ESG, and operational risk management. Risks identified through supplier onboarding, supplier performance reviews, customer requirements, complaints, sourcing changes, or

changes in supplier geography may be escalated through the ERM process for review, scoring, mitigation planning, and leadership reporting.

Pattison ID has not engaged in formal external stakeholder initiatives specifically focused on forced labour or child labour during the reporting period. However, Pattison ID monitors customer requirements, supplier performance, regulatory developments, and reporting obligations, and may consider additional external engagement where appropriate as its modern slavery risk mitigation program develops.

## **V. MODERN SLAVERY REMEDIATION MEASURES**

### Steps to Prevent and Reduce Risks of Forced and Child Labour

- Ensuring all vendors and subcontractors understand Pattison ID's commitment to Ethical and Professional conduct, to keeping all stakeholders safe and free from harm, and to protecting and fostering a healthy environment and planet;
- Prioritizing to focus due diligence efforts on the most severe risks of forced and child labour; and
- Monitoring suppliers.

### Remediation Measures

Pattison ID undertakes diligence efforts to ensure the risk of forced labour and child labour is mitigated in its business.

If Pattison ID discovers any forced labour or child labour in its business and supply chains, the following measures to remediate are taken:

- *Suspension or termination of a supplier, sub-supplier or contractor;*
- *Actions to prevent forced labour or child labour and associated harms from reoccurring;*
- *Actions to support victims of forced labour or child labour;*
- *Grievance mechanisms; and*
- *Formal apologies.*

Pattison ID's Supplier Code of Conduct also supports remediation and enforcement by allowing Pattison ID to take disciplinary action where violations are identified. Depending on the circumstances, this may include verbal or written warnings, temporary or permanent removal from Pattison ID job sites, termination of contract, and/or removal from Pattison ID's approved vendor list.

During the 2025 reporting period, Pattison ID did not identify any confirmed instances of forced labour or child labour requiring remediation.

## **VI. LOSS OF INCOME – REMEDIATION MEASURES**

### Steps to be taken to remediate if there is a loss of income resulting from remediation measures

- *Actions to support victims of forced labour or child labour and/or their families such as workforce reintegration and psychosocial support;*
- *Compensation for victims of forced labour or child labour and/or their families; and*
- *Community and stakeholder engagement or wider capacity-building measures.*

During the 2025 reporting period, Pattison ID did not identify any confirmed instances of forced labour or child labour in its operations or supply chain and therefore did not identify any loss of income to vulnerable families resulting from remediation measures.

## **VII. Measures Taken to Strengthen Compliance and Risk Mitigation**

### **Supplier Code of Conduct and Vendor Onboarding**

In fall 2025, Pattison ID strengthened its supplier governance framework by incorporating the Supplier Code of Conduct into its new vendor onboarding package. This change was designed to ensure that new vendors and subcontractors are introduced to Pattison ID's expectations regarding ethical conduct, legal compliance, health and safety, environmental responsibility, and the prohibition of forced labour and child labour at the outset of the supplier relationship.

During the reporting period, more than 25 new vendors or subcontractors were onboarded using the updated vendor package.

### **Scope and Application**

Pattison ID's Supplier Code of Conduct sets forth the minimum standards of conduct, ethical behaviour, legal compliance, and sustainability practices expected of subcontractors, suppliers, manufacturers, and vendors engaged by Pattison ID. The Code applies to Vendors conducting business with or on behalf of Pattison ID in Canada, the United States, and international jurisdictions.

The Code addresses professionalism and customer experience, health and safety compliance, quality and installation standards, ethical conduct and anti-corruption, human rights and labour standards, environmental responsibility, communication and responsiveness, site conduct, insurance and legal compliance, confidentiality and brand protection, monitoring and continuous improvement, and disciplinary action for violations.

### **Human Rights and Labour Standards**

The Supplier Code of Conduct requires Vendors to prohibit forced, bonded, or child labour in any form, respect freedom of association and collective bargaining rights, align their operations with the principles of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act and relevant International Labour

Organization conventions, and cooperate with self-assessments, site visits, or audits as reasonably requested by Pattison ID.

The Code also requires Vendors to ensure that their employees, agents, and subcontractors comply with the principles contained in the Code.

### **Monitoring, Evaluation, and Corrective Action**

The Supplier Code of Conduct strengthens Pattison ID's ability to monitor vendor performance by reserving Pattison ID's right to evaluate Vendors using standardized scorecards, conduct audits, interviews, or on-site inspections, and require corrective action plans where deficiencies are identified.

Pattison ID did not complete a formal supplier audit program or annual supplier self-assessment process during the 2025 reporting period. However, the Supplier Code of Conduct provides a foundation for future risk-based supplier monitoring, including targeted self-assessments, site visits, audits, and corrective action plans.

### **Purchase Order Terms and Conditions — Subsequent Enhancement**

Following the 2025 reporting period, Pattison ID further strengthened its procurement controls by updating its ERP-generated purchase order process. Under this updated process, purchase orders direct vendors and suppliers to Pattison ID's terms and conditions, which reference and link to the Supplier Code of Conduct. By accepting a purchase order, the vendor or supplier acknowledges that it has read, understood, and agreed to the terms and conditions, including the Supplier Code of Conduct.

The updated purchase order process applies across Pattison ID's operating jurisdictions, including Canada, the United States, Mexico, and Puerto Rico, and applies to international suppliers that receive Pattison ID purchase orders. Because purchase orders are generated through Pattison ID's ERP system, the updated terms are applied consistently, and outdated purchase order templates are not expected to be used.

### **Forward-Looking Commitments**

Pattison ID is committed to continuing to strengthen its supplier engagement and modern slavery risk mitigation program through short-, medium-, and longer-term actions.

In the short term, Pattison ID intends to continue using the Supplier Code of Conduct in new vendor onboarding, continue applying updated ERP-generated purchase order terms and conditions that reference the Supplier Code of Conduct, and improve tracking of supplier coverage and training completion.

In the medium term, Pattison ID intends to develop a broader subcontractor audit approach to support quality, health and safety, environmental, and Supplier Code

compliance monitoring, and to consider targeted self-assessments, site visits, or audits for higher-risk supplier categories.

In the longer term, Pattison ID intends to further integrate modern slavery risk into its broader ERM, compliance, ESG, and supplier governance processes, including improved monitoring, escalation, corrective action, and effectiveness metrics.

## **VIII. TRAINING**

Every year, Pattison ID leaders are required to acknowledge that they are not aware of any environmental and/or health and safety contraventions as defined in company policies.

Pattison ID did not conduct stand-alone training specific to forced labour and child labour during the 2025 reporting period. However, Pattison ID has developed broader ethics and professional conduct training that includes content on human rights, ethical business conduct, forced labour, child labour, and Pattison ID's obligations under modern slavery legislation. This training is being rolled out to reinforce awareness of Pattison ID's expectations and the importance of escalating potential concerns.

Pattison ID recognizes that additional targeted training for employees involved in procurement, strategic sourcing, supplier onboarding, project management, operations, legal, compliance, and corporate services would further strengthen its modern slavery risk mitigation program.

## **IX. ASSESSING EFFECTIVENESS**

Pattison ID assesses the effectiveness of its modern slavery risk controls through its supplier governance, subcontractor vetting, purchase order controls, supplier performance monitoring, whistleblower and complaint mechanisms, and enterprise risk management processes.

During the 2025 reporting period, Pattison ID strengthened its preventive controls by incorporating the Supplier Code of Conduct into its new vendor onboarding package. Pattison ID also continued to rely on its subcontractor vetting process, project-based supplier performance evaluations, and escalation process for serious health and safety, environmental, or other supplier performance issues.

The Supplier Code of Conduct further supports effectiveness assessment by allowing Pattison ID to evaluate Vendors using standardized scorecards, conduct audits, interviews, or on-site inspections, and require corrective action plans where deficiencies are identified.

Pattison ID did not identify any confirmed instances of forced labour or child labour in its operations or supply chain during the reporting period. However, Pattison ID recognizes that the absence of confirmed incidents does not eliminate inherent

supply chain risk. Additional work is required to further assess the effectiveness of supplier controls, including improved tracking of supplier coverage, targeted monitoring of higher-risk suppliers, and development of more formal metrics for supplier compliance, training, escalation, and corrective action. Pattison ID did not receive any complaints or reports through its whistleblower, complaint, or informal reporting mechanisms during the reporting period that indicated confirmed forced labour or child labour concerns.

Future effectiveness measures may include tracking the number of vendors onboarded under the updated vendor package, the number or percentage of purchase orders issued under updated terms and conditions, training completion rates, supplier audit activity, supplier corrective actions, and any complaints or concerns raised through reporting channels.

## **X. APPROVAL AND ATTESTATION**

This Report was approved pursuant to paragraph 4(a) of the Act by **Jacque Duguay** on May 28, 2026 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at [[www.pattisonid.com](http://www.pattisonid.com)].

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Pattison ID. 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 the Act, for the reporting year listed above.



Jacque Duguay on behalf of Pattison ID  
Senior VP, Corporate Services & Sustainability, May 28, 2026  
*I have the authority to bind Pattison ID*