# OUTEDGE's Fighting Against Forced Labour and Child Labour in Supply Chains Report (2023)

## **ABOUT THIS REPORT**

Outedge Media Canada LP, formerly OUTFRONT Media Canada LP,¹ ("**OUTEDGE**", "we", "our" or "us") has prepared this report (the "Report") being submitted pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ended December 31, 2023 (the "Reporting Period").

This Report describes the steps taken to enhance transparency in our supply chains by outlining the steps taken during the 2023 financial year to prevent and reduce the risk that forced labour or child labour ("**Modern Slavery**") is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.<sup>2</sup>

#### **COMPANY STRUCTURE, ACTIVITIES AND SUPPLY CHAIN**

# **Company Structure**

OUTEDGE is a wholly owned subsidiary of OUTFRONT Media Inc. ("**OUTFRONT**"), a real estate investment trust providing advertising space ("**Displays**") on out-of-home advertising structures and sites in the United States (the "**US**") and in Canada.<sup>3</sup>

OUTEDGE is a limited partnership formed under the *Partnerships Act* (Ontario) and is principally based in Toronto, Ontario with other locations across Canada in most major markets including Vancouver, Calgary, Edmonton, Regina, Saskatoon, Winnipeg, Greater Toronto Area, Ottawa, Montreal, Halifax, and St. John's.

We believe in conducting our business in a sustainable way that considers the long-term interests of all our stakeholders, including our employees. We aim to create a workplace where employees feel engaged, rewarded and empowered. Culture plays an important role in the way we conduct business and attract talent and, as such, we actively promote a culture of collaboration, creativity, inclusivity and ownership throughout the employee experience.

In Canada, OUTEDGE employed 301 individuals as at December 31, 2023. These individuals were employed in sales and sales related positions and some were represented by labour unions and are subject to collective bargaining agreements.

# **Activities**

We are one of the largest providers of advertising space on out-of-home advertising structures and sites across Canada. Our inventory consists of billboard displays and street furniture

<sup>&</sup>lt;sup>1</sup> Until February 20, 2024, OUTEDGE Media Canada LP was known as OUTFRONT Media Canada LP.

<sup>&</sup>lt;sup>2</sup> OUTEDGE does not report in other jurisdictions under similar regimes.

<sup>&</sup>lt;sup>3</sup> OUTFRONT (NYSE: OUT) is incorporated pursuant to the laws of Maryland and principally headquartered in New York, NY. OUTFRONT is not a reporting entity under the Act.

advertising displays operated under exclusive multi-year contracts with municipalities in large major cities across Canada. As at December 2023, we had over 9000 Displays in Canada.

## Supply Chains

We rely on third parties to manufacture parts for our billboards, transit shelters and digital displays. In the Reporting Period, we contracted with approximately 2800 suppliers who supplied us with ink, paper, vinyl, materials associated with the maintenance of billboards, digital screens and associated parts, street furniture units, displays and associated parts (including glass) ("**Suppliers**"). The majority of our Suppliers, over 99.9%, are based in North America. Specifically, 98.7% of our Suppliers are based in Canada and 1.2% are based in the United States and 0.01% is Taiwan. Despite this, we appreciate that some of our Suppliers may supply us with products that originate from other jurisdictions. However, at present, we have limited insight into our second level Suppliers and beyond.

# POLICIES AND DUE DILIGENCE

At OUTEDGE, we incorporate integrity into everything we do – our day-to-day work, our business decisions, and our professional interactions. By committing ourselves to always doing business honestly and ethically, we can continue to succeed while maintaining the reputation that has earned us the trust of our clients.

As a subsidiary of OUTFRONT, OUTEDGE's directors, officers, executives, and employees, whether employed on a temporary, freelance, intern or per diem basis, are bound by the policies set out below.

# OUTFRONT - Code of Conduct (the "Code of Conduct")

At OUTEDGE, it is our policy that all officers and employees will, without limitation, comply with all Canadian and United States laws and regulations (as applicable), including those relating to human rights and Modern Slavery.

#### Ethics Line

Our people have access to an ethics line, supported by OUTFRONT (the "Ethics Line"). The Ethics Line is available 24 hours, seven days a week. Trained specialists from an independent third party answer the calls, document the concerns and forward a written report to OUTFRONT for further investigation. When contacting the Ethics Line or make a report, the individual may choose to remain anonymous where local laws permit. We treat all reports promptly and discreetly.

Employees who report possible problems should not fear retaliation as we do not tolerate any form of retaliation against an employee who asks questions, makes a report of actions that may be inconsistent with our Code of Conduct, policies, laws or regulations or assists in an investigation of suspected wrongdoing.

# Supplier Compliance Policy (the "Supplier Policy")

At OUTEDGE, we strive to maintain throughout our operations a work environment that reflects the highest standards of business ethics and workplace behavior, and a commitment to legal compliance and ethical business practices in all of our operations.

We promote these standards by communicating to our Suppliers our expectation that they will comply with all applicable laws and regulations in the places in which they do business, including those relating to human rights, hours of work, and wages, to take reasonable measures to ensure that their suppliers do so as well, and to maintain a high degree of ethics in every aspect of their business with us and others. We are firm in our resolve to prioritize only those Suppliers who share our values, including those related to integrity and ethical business practices.

Specifically, the Supplier Policy prohibits, among other things:

- Employing workers in breach of immigration laws, applicable minimum age of work laws or any other form of unlawful child labour;
- Employing workers by means of force, threats of force or physical restraint, or by means
  of actual or threatened abuse of law or legal process, or by any other means of scheme,
  plan or pattern intended to cause the person to believe that if that person did not perform
  such labor or service, that person or another person would suffer serious harm or physical
  restraint; and
- Behavior that violates import or export laws.

## Due Diligence

At OUTEDGE, it is especially important that we carefully monitor third parties acting on our behalf. We carefully screen all third parties, including suppliers, consultants and vendors who work on our behalf, particularly when dealing in countries with high corruption rates and in any situations where "red flags" would indicate further screening is needed before retaining the third party. Third parties must understand that they are expected to operate in strict compliance with our standards and to maintain accurate records of all transactions.

#### POTENTIAL RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

In 2023, as part of OUTEDGE's efforts to prevent and reduce the risk of Modern Slavery in our supply chains, we, continued to review and consider the policies as set out above and monitor for compliance with them by both employees and Suppliers.

# Potential Risks in Our Operations

We consider the risk of Modern Slavery occurring within our operations to be low considering our workforce and our policies and procedures that govern our day-to-day operations and employment relationships. Specifically, our workforce is comprised of skilled employees.

From a geographical risk perspective, OUTEDGE's employees operate in Canada only, which has a low prevalence of child and forced labour, a low risk of vulnerability to child and forced labour and a fairly robust governmental response addressing child and forced labour.<sup>4</sup>

#### Potential Risks in Our Supply Chain

We recognize that the risks of Modern Slavery are inherent to all supply chains. Further, we understand that particular regions, products and raw materials carry a higher risk of Modern

1396-4372-1739.4

<sup>&</sup>lt;sup>4</sup> Walk Free, Global Slavery Index 2023, found here.

Slavery because of the prevalence of Modern Slavery in particular countries. There are also risks linked to certain industries even in countries considered to have lower risks of child and forced labour. Notwithstanding the risks inherent to working with third party international suppliers, we did not identify and we were not made aware of any instances of Modern Slavery. Accordingly, no steps were required to remediate child or forced labour, or the loss of income associated with remediation efforts.

#### **TRAINING**

Hiring, developing and retaining employees is important to our business and we place a priority on helping our employees build both their skills and careers. We provide regular and ongoing employee development and training, through among other things, our annual performance review process, and employee trainings in consultative selling, technology, safety, compliance, management, and leadership skills.

#### **ASSESSING EFFECTIVENESS**

As we continue to evaluate our compliance measures in place that are designed to prevent and reduce the risk of Modern Slavery, we intend to consider, where appropriate, implementing measures to assess the effectiveness of any of our processes.

#### **GENERAL PARTNER APPROVAL AND ATTESTATION**

This Report was Approved by the Board of Directors of OUTEDGE Media Canada GP Co. as general partner of OUTEDGE, pursuant to section 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind OUTEDGE Media Canada GP Co. being the general partner of OUTEDGE Media Canada LP.

Name: Michele Erskine

Position: Director, OUTEDGE Media Canada GP Co.

May 23, 2024