



HUMAN TRAFFICKING AND ANTI-SLAVERY POLICY

I. PURPOSE

AAA Canada Inc. strictly prohibits management, employees, contractors, contractor employees from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to her/himself or another person.

II. POLICY

AAA Canada Inc. also prohibits management, employees, contractors and contractor employees from engaging in practices relating to trafficking in persons, including:

1. Destroying or otherwise denying access to an employee's identity or immigration documents such as a passport or driver's license, regardless of issuing authority (Criminal Code of Canada Section 279.03 – Withholding or destroying documents);
2. Using misleading or fraudulent practices to recruit employees, such as failing to disclose, in a format and language accessible to the employee, key terms and conditions of employment, including wages and benefits, the location of work, the living conditions, housing and associated costs, if applicable, and the hazardous nature of the work, if applicable;
3. Using recruiters that do not comply with local labor laws;
4. Charging employees recruitment fees;
5. Failing to provide return transportation to employees who are brought to the country for the purpose of working under a Canadian contract at the term of the contract, except in the case of serious misconduct;
6. Providing housing/accommodations, when specified in the contract, that fail to meet host country standards;
7. Failing to provide an employment contract or work document where required by law.

III. RESPONSIBILITY AND AWARENESS PROGRAM

AAA Canada Inc. has developed and implemented an Awareness Program to inform all employees about the Canadian Trafficking Legislation prohibitions against trafficking-related activities described in the Criminal Code of Canada (Section 279.01 – 279.04) and Immigration and Refugee Protection Act (Section 118), the prohibited activities, and the consequences of violating these provisions. Employees will be informed and made aware of:

- AAA Canada Inc.'s *Human Trafficking and Anti-Slavery Policy and Code of Conduct*;
- Consequences of violating AAA Canada Inc.'s policy;
- The violation reporting process;
- The Canadian Trafficking Legislation via a summary document.

Every manager, employee, contractor and contractor employee of AAA Canada Inc. is responsible for ensuring compliance with this Policy by attesting with signature that they:

- have received, read and understood the *Human Trafficking and Anti-Slavery Policy* and agree to abide by it;

- acknowledge that the principles of legal and ethical business behavior set forth in this document apply to their conduct as a manager, employee, contractor and contractor employee for AAA Canada;
- know that they are expected and have a responsibility to report any concerns or possible violations, without fear of retaliation and subject to employee protection.

IV. DISCIPLINARY ACTION

Any violation of this Policy could result in disciplinary action, up to, and including, termination of contract, business relationship, or employment.

V. REPORTING

1. Credible information regarding a potential violation of this Policy, whether by a AAA Canada Inc. employee, agent, contractor, or contractor employee must be immediately reported to the Human Resources Department at antitrafficking.HR@aaa-canada.ca and the AAA Canada Inc.'s Ethics Committee at compliance.committee@aaa-canada.ca. Reported concerns will be promptly investigated by the Human Resource's Department. Employees in disagreement with the results may appeal the decision to the Ethics Committee;
2. Reporting will be done without fear of retaliation.
3. Employees aware of a potential human trafficking violation, may in addition, contact the *Canadian Centre to End Human Trafficking (CCEHT)* at *Canada's National Human Trafficking Hotline* at 1 (833) 900-1010.

VI. COMPLIANCE PLAN

AAA Canada's Compliance Plan includes:

1. Procedures to ensure compliance with the Policy;
2. An Awareness Program;
3. A recruitment and wage plan that ensures compliance with the country's legal requirements;
4. Procedures to prevent breaches as well as monitor, detect and terminate violators.

For further information regarding the Policy or the Compliance Plan, please contact AAA Canada Inc.'s Human Resources Department at antitrafficking.HR@aaa-canada.ca.



Vincenza Tufano, CHRP
Vice-President, Human Resources

2026/01/27

Date



**AAA CANADA INC.'S ACTION PLAN
Human Trafficking and
Anti-Slavery Action Plan**

Committee (3 representatives)
Arnaud Averadère, Vianel Guillen & Hamid Djellali

Representative from the HR Dept. responsible to receive the emails with complaints
Vincenza Tufano

Accomplishment 2025:
During Onboarding, new employees are asked to complete and sign the form *International Mobility Program Get to know your rights while working in Canada*, detailing employee rights, how to get help, across Canada, if these rights are disrespected.

Accomplishment 2025:
In January, Annual distribution of policy and certification; reminder and awareness-raising in July, on World Day Against Trafficking in Persons, and at the end of the year.

Accomplishment 2025:
Accessibility to the Human Trafficking and Anti-Slavery Policy and Certification via AAA Canada's website.

Objective 2026:
FLAASH Newsletter – raise awareness and remind employees of the policy, certification, and the rights of all workers in the workplace.

Objective 2026:
Create a short video to raise awareness around Human Trafficking & Anti-Slavery.

Objective 2026:
Include the HT & AS incidents in the Company's Performance Governance Report (track incidents and meetings in the ESA registry).