Anti-Slavery & Human Trafficking Policy

Policy Statement

ACCES Employment has a zero-tolerance policy toward all forms of Modern Slavery, including forced or bonded labour, child labour, servitude, human trafficking, deceptive recruitment, and forced marriage. We are committed to upholding human rights and preventing exploitation in our operations and supply chains.

Key Definitions

- **Modern Slavery** refers to practices such as forced labour, servitude, slavery, bonded labour, child labour, human trafficking, deceptive recruitment, and forced marriage.
- **Forced Labour** means work performed under threat, coercion, or without consent.
- **Child Labour** involves work by individuals under 18 that harms their health, development, or education.
- **Human Trafficking** is the recruitment, movement, or control of people for the purpose of exploitation.
- **Deceptive Recruitment** occurs when individuals are misled about job terms, wages, or conditions.
- **Forced Marriage** takes place when someone is compelled to marry without full and free consent.

Scope

This policy applies to all ACCES Employment employees, board members, contractors, suppliers, vendors, and business partners.

Legal and Contractual Compliance

This policy complies with relevant legislation, including the *Criminal Code of Canada*, the *Immigration and Refugee Protection Act*, the *Combating Human Trafficking Act (2021)*, and the *Prevention of and Remedies for Human Trafficking Act (2017)*.

Due Diligence & Risk Management

ACCES takes all reasonable steps to ensure that no modern slavery is present in our supply chains, or in any part of our business.

Training & Awareness

All individuals within ACCES Employment—including Board members, senior leadership team, and employees—must be familiar with this policy and if applicable, complete training on the risks of modern slavery and the internal reporting protocols.

Reporting Requirements

Any ACCES Employment employee, partner, or supplier who becomes aware of actual or suspected Modern Slavery must report it immediately to an ACCES Employment leader. ACCES Employment will investigate and take necessary actions to remediate the situation.

Support for At-Risk Individuals

ACCES Employment ensures that people using our services who may be at risk of exploitation are informed of their rights and legal protections. Where appropriate, they are referred to resources such as Indigenous Anti-Human Trafficking Liaisons, the Victim Quick Response Program+, or local police services.

Breach of Policy

Any supplier or partner found to be involved in Modern Slavery will have their agreements with ACCES Employment terminated. Employees who breach this policy will face disciplinary action, up to and including termination. Incidents will be reported to relevant law enforcement or regulatory bodies.

Policy Review

This policy will be reviewed every three years or earlier as needed, to ensure continued alignment with evolving legal, funder, and industry requirements.