



**Policy Against Human Trafficking,  
Forced Labor and Child Labor**

## Policy Against Human Trafficking, Forced Labor and Child Labor

### 1.0 PURPOSE

Creation is committed to a work environment that is free from human trafficking and involuntary servitude, which for purposes of this policy, includes forced labor and child labor. Creation will not tolerate or condone human trafficking or involuntary servitude in any part of our global organization.

### 2.0 SCOPE

This Policy Against Human Trafficking, Forced Labor and Child Labor (“Policy”) applies to all personnel employed by or engaged to provide services to Creation, including, but not limited to, Creation’s employees, officers, temporary employees and independent contractors. Collectively referred to herein a “employee” for convenience.

### 3.0 DEFINITIONS AND BACKGROUND

Human trafficking is the action or practice of illegally recruiting, harboring, providing, obtaining or transporting people from one country or area to another, typically for the purposes of forced labor or sexual exploitation. Human trafficking is a crime and human rights abuse. It is also sometimes called “modern day slavery.”

Different forms of human trafficking are:

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|------------------------|---|
| Forced Labor:          | Knowingly providing or obtaining the labor or services of a person by means of: (a) threats of serious harm to, or physical restraint against, that person or another person; (b) any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or (c) the abuse or threatened abuse of law or the legal process. |
| Involuntary Servitude: | Involuntary servitude includes a condition of servitude induced by means of: (a) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or (b) the abuse or threatened abuse of law or the legal process.   |
| Sex Trafficking:       | The action or practice of inducing a commercial sex act by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.  |
| Child Labor:           | The use of children in industry or business, especially when illegal or considered inhumane.  |

### **3.1 Signs of Human Trafficking**

- The person is not allowed to speak for themselves and their activities are controlled by someone else.
- The person is under 18 and involved in prostitution or sex work.
- The person is unpaid or paid very little to work and seems to be treated poorly (long or unusual hours, not allowed breaks, forced to live in poor conditions, etc.).
- The person is repaying a large debt through labor or sex.
- The person seems fearful, anxious, depressed, submissive, tense, or nervous/paranoid. They may avoid eye contact, seem fearful around police, etc.
- The person shows signs of abuse, such as bruising, cigarette burns, fractures, etc.
- The person has tattooing or branding symbols, particularly names.
- The person doesn't have their own things or money and doesn't control their own passport or other documents.
- The person seems malnourished or lacks medical care.
- The person is moved frequently and may not know their surroundings well.
- The person has been reported missing.

### **3.2 Risk of Labor Trafficking**

- Being a newcomer or having uncertain immigration status is the largest risk factor for labor trafficking.
- Other factors, such as being homeless, can also make somebody more likely to be trafficked.
- People who are isolated or who can't speak the local language are especially vulnerable to trafficking and may have the hardest time getting help.
- Internationally, there have been human trafficking cases involving construction, manufacturing, mining, hospitality, salons, agriculture, domestic work, sales and other industries.

### **3.3 Other facts about Labor Trafficking**

- Language like "forced labor," "servant" and "servitude" are sometimes used when talking about labor trafficking.
- "Debt bondage" is a form of labor trafficking where a person is told they must work to pay off a large, unexpected and illegal debt.
- People in other countries and newcomers may be recruited by someone from their home country or someone local who makes false promises about what the job is and how much it pays.
- The person may not know their rights in the local jurisdiction, may not know how to get help, or may fear reporting to police.

- Labor traffickers often take away passports and other documents, and sometimes control where the person stays.

#### 4.0 POLICY STATEMENT

4.1 Creation prohibits trafficking in persons and involuntary servitude. Creation employees, contractors, subcontractors, vendors, suppliers and their sub-suppliers, partners and others through whom Creation conducts business must not engage in any practice that constitutes trafficking in persons or involuntary servitude. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place; and
- Charging employees or potential employee's recruitment fees.

4.2 Creation endeavors to verify, evaluate, promote awareness about, and address risks associated with force labor and human trafficking in its direct supply chain.

#### 5.0 RESPONSIBILITIES

The functions listed below have responsibilities detailed in this procedure:

Vice President & General Manager – Procedure Owner

People and Culture

All the members of Business Unit

## 6.0 POLICY COMPLIANCE

- 6.1 Creation has developed a program for awareness of human trafficking.
- 6.2 Internal control systems and procedures will be periodically audited to provide assurance that they are effective in countering human trafficking.
- 6.3 Human trafficking training programs will be periodically audited to ensure that effective training is being provided.
- 6.4 Appropriate due diligence will be applied before engaging any consultant, agent, supplier, vendor or subcontractor or participating in any merger or acquisition to prevent the acquisition of human trafficking related liabilities. Notably, Creation expects its suppliers to be humane and lawful employers, and to enforce similar requirements from their sub-suppliers. These expectations are outlined in Creation's standard purchase contract terms and conditions.
- 6.5 Every person hired in Creation is made aware of the facts about human trafficking, signs of human trafficking, risk associated with human trafficking and methods to report it.
- 6.6 Any person who suspects that a co-worker or a supplier of Creation is utilizing child labor or forced labor in manufacturing any product whether supplied or not supplied to Creation shall report the issue to Creation's legal department.
- 6.7 Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law. Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.
- 6.8 If there is any concern, they may confidentially report the matter to the appropriate government contacts or if there is immediate danger or if you suspect a child under 18 is being trafficked, call 911 or your local police service.

## 7.0 STATUTORY FRAMEWORK

Human trafficking is against the laws of Canada and United States. The companies involved in any trade or business with the government must ensure that they have not involved any illegal worker in their business.

## 8.0 RETALIATION AND FAILURE TO COMPLY

Employees who raise concerns in good faith are protected from retaliation This Policy prohibits any adverse action against an employee for reporting a safety concern or misconduct in good faith. Adverse actions can include threats, intimidation, harassment, discrimination, limiting career opportunities, or termination.

Employees who violate this Policy will be subject to disciplinary action, including termination.