



Modern Slavery Statement

Introduction

This Modern Slavery Statement reflects Borealis' commitment to combating modern slavery and human trafficking. Borealis is not subject to statutory reporting requirements under any modern slavery legislation globally, including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. We voluntarily issue this statement to demonstrate our dedication to ethical practices and human rights globally.

Our commitment

Borealis has a zero-tolerance approach to modern slavery and human trafficking. We are committed to maintaining the highest standards of ethical conduct and human rights within our operations and supply chains. Our efforts are directed towards continuous improvement to prevent any forms of modern slavery.

Organizational structure and operations

Borealis is a global leader in stakeholder engagement software solutions. Headquartered in Magog, Quebec, Canada, we operate globally with a hybrid work model, combining remote work with on-site work from our Magog office. We employ a diverse workforce and leverage advanced technology to deliver exceptional value to our clients.

Supply chain

As a SaaS company, Borealis relies on a network of suppliers for various services and products. While the risk of modern slavery within our direct supply chain is low, we are committed to ensuring that our suppliers uphold the same high standards of ethical conduct. We require our suppliers to adhere to our Supplier Code of Conduct, which includes strict prohibitions against forced labor and human trafficking.

Policies and practices

Borealis has implemented several policies and practices to combat modern slavery:

1. **Supplier code of conduct:** Our Supplier Code of Conduct outlines our expectations for suppliers regarding labor rights, human rights, and ethical conduct. Suppliers must comply with all applicable laws and regulations related to modern slavery.

2. **Due diligence:** We conduct regular due diligence on our suppliers to assess and mitigate risks related to modern slavery. This includes evaluating suppliers' labor practices and ensuring compliance with our standards.
3. **Training and awareness:** We provide training to our employees and suppliers to raise awareness about modern slavery and human trafficking. This training includes identifying signs of modern slavery and understanding the reporting mechanisms in place.
4. **Reporting mechanisms:** We have established clear reporting mechanisms for employees and suppliers to report any concerns related to modern slavery. Reports can be made anonymously, and we ensure that there is no retaliation against individuals who raise concerns.

Risk Assessment and mitigation

We continuously assess the risks of modern slavery within our operations and supply chains. This involves:

- **Regular audits:** Conducting regular audits of our suppliers to ensure compliance with our standards.
- **Supplier engagement:** Engaging with suppliers to address any identified risks and working collaboratively to implement corrective actions.
- **Monitoring and review:** Regularly reviewing and updating our policies and practices to ensure they remain effective in combating modern slavery.

Training and capacity building

Borealis is committed to building capacity within our organization and supply chains to effectively address modern slavery. We provide ongoing training to our employees and suppliers, emphasizing the importance of ethical conduct and compliance with our anti-slavery policies.

Reporting and transparency

We are committed to transparency in our efforts to combat modern slavery. We provide regular updates on our progress and challenges in addressing modern slavery within our operations and supply chains. This statement is publicly available on our website, and we welcome feedback and engagement from our stakeholders.

Assessment of effectiveness

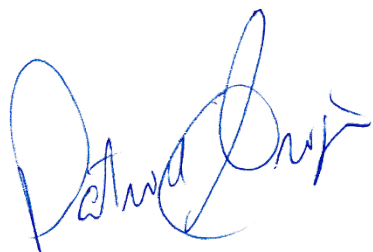
We continually refine our strategies to eliminate modern slavery from our supply chains. This includes regular monitoring, verification, and validation of our processes against existing programs and future initiatives. We remain engaged with suppliers and relevant stakeholders beyond our requirements to ensure sustained progress.

Global applicability

This statement is intended to be sufficient for Borealis' global operations. It aligns with international standards and practices, ensuring that our commitment to combating modern slavery is upheld across all jurisdictions where we operate. By adopting a global perspective, we ensure that our policies and practices are robust and comprehensive, addressing the risks and challenges associated with modern slavery and human trafficking worldwide.

Approval and attestation

This Modern Slavery Statement has been approved by the Board of Directors of Borealis. We attest that the information provided in this statement is true, accurate, and complete to the best of our knowledge.

A handwritten signature in blue ink, appearing to read 'Patrick Grégoire', is positioned above the name and title. The signature is fluid and cursive, with a large initial 'P' and 'G'.

Patrick Grégoire
CEO and Founder