

WINNIPEG FOOTBALL CLUB

Modern Slavery Act Report

Fiscal Year 2025 (January 1, 2025 – December 31, 2025)

Overview

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) imposes an obligation on entities to report on the measures taken to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This report covers the 2025 fiscal year (January 1 – December 31, 2025) and addresses the steps taken by the Winnipeg Football Club (the “Club” or “WFC”) in 2025 in regards to the Act.

Incorporated in 1951, WFC is a non-share, community corporation responsible for the operation of the Winnipeg Blue Bombers professional football franchise and related business activities including administration, retail, ticket operations, stadium operations, and community outreach programs and activities. The operation is primarily based out of Princess Auto Stadium on the University of Manitoba campus in Winnipeg, Manitoba. The Winnipeg Blue Bombers are a member Club of the Canadian Football League (the “CFL”). WFC had over 1,700 casual, part-time, and full-time employees in 2025 and is governed by a Board of Directors, who also participate in several sub-committees including the Executive Committee, Governance and Nominating Committee, Finance and Risk Committee, and Community Relations Committee.

The Club is dedicated to the support and development of amateur football in Manitoba through various programs for young athletes and amateur coaches and is committed to making a positive impact within the community. In 2025, WFC actively participated in and hosted over 200 community events.

WFC is committed to maintaining the highest standards of ethics and integrity, and to complying with all applicable human rights and employment standards legislation. The Club expects its business partners and suppliers to adhere to the same principles. The policies and steps WFC has taken to address and mitigate modern slavery risks are detailed in this report.

Structure, Activities and Supply Chain

Organizational Structure

The Winnipeg Football Club has a robust governance structure to ensure policies are in place and best practices are followed. Oversight is provided at multiple levels, including the Board of Directors, Board sub-committees, and senior executive management. The Finance and Risk Committee oversees the risk management process including the Club’s legal and regulatory compliance, including obligations under the Act.

Activities and Supply Chain

WFC globally sources football equipment for use by the team and goods for its retail operation, sold through its in-stadium store and online platform. In 2025, purchases were made through established, reputable, well-known vendors, manufacturers, and distributors, primarily in the United States and through established exporters and manufacturers in China and Hong Kong.

WFC's primary product and service categories include:

- Professional football team operations (players, coaching staff, equipment)
- Stadium operations at Princess Auto Stadium
- Retail merchandise (apparel, equipment, branded goods)
- Ticketing and event management
- Community outreach and programming

WFC collaborates with the CFL, CFL member Clubs, and other major league sports industry partners to monitor various suppliers and their adherence to practices preventing child and forced labour in the production and distribution of imported sports equipment, athletic apparel, and retail goods.

Policies and Due Diligence Processes

Internal Operating Policies

WFC maintains a suite of internal policies that collectively address modern slavery, forced labour, and child labour risks:

Employment Standards Compliance

WFC complies with Manitoba's Employment Standards program under Manitoba Finance for all employees. The program administers laws on minimum wages, protection for young workers, hours of work, holidays, and other workplace entitlements and responsibilities, and enforces The Employment Standards Code, The Construction Industry Wages Act, The Remembrance Day Act, and The Worker Recruitment and Protection Act. It also investigates complaints about violations of these laws.

Human Resources Policy

All full-time staff must adhere to the Club's Human Resources Policy ("HR Policy"), which covers the Club's guiding principles with emphasis on respecting human rights and prohibiting involuntary labour practices. Staff confirm understanding and compliance annually.

Additionally, WFC provides annual diversity and inclusion training for all full-time staff and reviews all documented violence and harassment prevention policies on an annual basis in accordance with the HR Policy.

Safety and Health Management System Policy

WFC's Safety and Health Management System Policy manual sets out basic safety standards for all employees working for the Club or at Princess Auto Stadium. Additional rules and instructions may be issued verbally by Winnipeg Football Club Supervisors or Management from time to time and as required.

Whistleblower Policy

WFC's Whistleblower Policy applies to all employees, volunteers, and Board Members. It is intended to encourage and enable WFC personnel to raise concerns about violations of the Legal Conduct Standard and/or Ethical Conduct Standard without fear of retaliation, with confidentiality maintained wherever possible.

The full Standards of Behaviour are set out in Section 2.0 of the WFC Human Resources Policies and include expectations that all WFC Personnel shall always:

- Comply with the law and avoid any activity which breaches application law (Federal, Provincial, and Municipal) (the "Legal Conduct Standard")
- Act ethically and with honesty and integrity (the "Ethical Conduct Standard")

Player and International Worker Compliance

Players are governed by the CFL's code of conduct. Players from outside Canada must obtain work permits through the Government of Canada Immigration process and must disclose any prior criminal charges or convictions in any country or territory, visa or permit refusals, denied entry, or removal orders to leave Canada or any other county or territory.

Volunteer Management

WFC had approximately 300 active volunteers in 2025 under the Fan Ambassador volunteer program. Volunteers complete an application and orientation process. All volunteer participation is voluntary and uncoerced, with volunteers receiving in-kind acknowledgements (game tickets, store discounts, gift cards) for their contribution to the football organization.

Supplier Expectations

WFC does not currently maintain a formal standalone supplier code of conduct. The Club relies on each supplier to manage compliance with child and forced labour laws, and Canadian market expectations. The WFC has built strong relationships and communication channels with key suppliers, which allows for insight and management of key supply chains. This helps provide some assurance to the Club that each supplier is complying with child and forced labour laws and Canadian market expectations.

While the CFL is not itself an importer or producer of goods with reporting obligations under the Act, the CFL's current agreements with licensees to use the CFL and/or the Club's marks for merchandise include broad compliance obligations that the CFL and the Club has relied on to ensure that no forced or child labour is used in connection with the manufacture of its branded goods and that the license agreements include record-keeping, oversight, audit and remediation clauses to drive compliance among our licensees.

Policy Communication and Enforcement

Internal policies are communicated at onboarding and reviewed annually. Externally, supplier expectations are communicated through the purchase order process and, for licensed merchandise, through the CFL's licensee agreements.

Risk Assessment and Management

Risk Assessment

The WFC acknowledges there is a risk of exploitation in the global supply chain for the supply of sporting equipment and the production of athletic apparel and other items used in related retail operations.

WFC identifies and assesses modern slavery risk through:

- Internal review of operations, payments, and related activities by senior management
- Vendor review during the purchase order process
- Monitoring updates from Public Safety Canada

Risk Management

WFC remains focused on refining its efforts to ensure it is identifying and mitigating modern slavery risks in its operations.

Remediation Measures and Remediation of Loss of Income

Current Remediation

To date, based on a review of WFC's operations, payments, and related activities, no instances of forced labour or child labour have been identified in either the Club's operations or supply chains, and no remediation measures have been required. Should any incident be identified in future, WFC is committed to taking prompt remediation action.

Training

Current Training

WFC provides the following training relevant to modern slavery and employment rights compliance:

Diversity and Inclusion Training:

All full-time staff complete annual diversity and inclusion training covering respect for human rights, prohibition of harassment and discrimination, and equitable treatment of workers.

HR Policy Acknowledgement:

All full-time staff review and sign off on the HR Policy annually. The Policy includes provisions directly relevant to modern slavery prevention, including prohibition of involuntary labour practices.

Violence and Harassment Prevention:

WFC reviews all documented violence and harassment prevention policies annually with full-time staff.

Volunteer Orientation:

Volunteers receive an orientation covering the Club’s standards of behaviour and their rights as volunteers.

Assessing Effectiveness

Current Effectiveness Measures

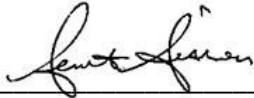
The Winnipeg Football Club assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains through:

- Annual review of policy and procedural manuals to ensure they include all applicable employment standards.
- Ensure the Club’s Modern Slavery Act Report aligns with legal requirements.
- Perform due diligence practices for vendors during the purchase order process.
- Educate all employees and raise awareness of our obligations under legislation.

Board of Directors Approval and Attestation

This Report was approved by WFC’s Board of Directors on *May 27, 2026*.

In accordance with the requirements of the Act, and in particular section 11(4)(a) 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.



Scott Sissons
Board Chair

*I have the ability to bind the
Winnipeg Football Club*



Wade Miller
President and CEO

*I have the ability to bind the
Winnipeg Football Club*