

The Globe and Mail

Modern Slavery Report

Fiscal Year 2024

The Globe and Mail Inc. (“The Globe and Mail”) is committed to respecting human rights and does not tolerate modern slavery, including forced or child labour, in its business or in its supply chain. Canada’s law, *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) requires The Globe and Mail to report on actions we have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour used at any step of our production of goods in Canada or elsewhere. The Globe has identified the print editions of our newspaper as goods covered by the Act. This report relates to our 2024 fiscal year being September 1, 2023 to August 31, 2024.

The Globe and Mail, founded in 1844, is Canada's foremost news media company. Headquartered in Toronto, The Globe and Mail is a privately owned, Ontario corporation. Our offices and workforce are based in Canada. As a leading news organization, The Globe and Mail’s print and digital formats reach millions of readers every week. The Globe and Mail leads the national discussion by engaging Canadians through its award-winning coverage of news, politics, business, investing and lifestyle topics, across multiple platforms. Our coverage has raised public awareness of the risks of modern slavery in Canada and promoted corporate accountability and policy reform to address such risks.

The Globe and Mail complies with applicable labour and employment laws, including respecting minimum working age and wage requirements. The Globe and Mail has various policies addressing ethical behaviour, including a Code of Conduct which requires employees to comply with all applicable laws and uphold the highest levels of business ethics and personal integrity. Employees are required to consider if their actions could be unethical, illegal or improper, how their decisions could impact others, and to escalate and report any violations of our Code of Conduct. We require our employees to raise concerns about unethical or illegal conduct to their manager, and in certain cases, to designated members of our executive team. The Globe and Mail provides employees with a confidential, third-party reporting line as a mechanism to report concerns. Employees are required to review the Code of Conduct when they join The Globe and Mail.

As part of our review of our supply chain, our Code of Conduct was updated in 2024 to expressly require employees to be vigilant about recognizing potential forced or child labour in our business or in our supply chains. In addition, we have provided training for select employee groups that regularly work with third-party vendors used in the physical print production of our publications.

Our newspaper is printed in Canada by third-party printers, in accordance with The Globe and Mail’s Sustainability Policy (<https://www.theglobeandmail.com/privacy-terms/global-sustainability-policy/>). Our suppliers source their paper from Canadian paper manufacturers, who carry Forest Stewardship Council (FSC), Program for the Endorsement of Forest Certification (PEFC) or SFI (Sustainable Forestry Initiative) certifications in their operations. Other suppliers that support the production and distribution of our printed newspaper, such as software providers, are primarily located in Canada, the United States or Europe. We strive to select suppliers who

are reputable and committed to complying with applicable laws, including observing employment standards and human rights laws. We've reviewed our suppliers involved in the production of our printed goods, and will continue to work towards strengthening their commitments to maintain controls to monitor and detect modern slavery in their operations and supply chain, and to appropriately remediate any risks that are discovered. We will continue to review our procurement practices to identify improvements we can make in order to monitor, detect, and address risks of modern slavery in our supply chains.

While human rights groups have reported risks of modern slavery in the production of printed goods, upon review of the vendors in our supply chain and, given our predominantly Canadian operations, the risk of forced and child labour in our printed goods supply chain remains low. We are committed to monitoring how modern slavery risks could evolve and impact our supply chain, and if risks were to be discovered, we would take appropriate measures to remediate such risks and consider the loss of income to families that can result from measures taken to eliminate the use of forced labour or child labour.

The Globe and Mail has an executive governance committee whose members report to The Globe and Mail's Audit Committee of the Board of Directors. The executive governance committee meets regularly to provide oversight on governance matters related to the company, including ethics and compliance with applicable laws and The Globe and Mail's policies.

This report was approved pursuant to 11(4)(a) of the Act by The Globe and Mail's Governance Committee on May 26, 2025.

In accordance with the requirements of the Act, and in particular section 11 of the Act, I attest that I have reviewed the information contained in this report for The Globe and Mail. 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.

Jesse Langdon

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Jesse Langdon, Vice President, Corporate Secretary and General Counsel
The Globe and Mail Inc., May 29, 2025
I have the authority to bind The Globe and Mail