

55 Canarctic Drive • Downsview, Ontario, M3J 2N7 • Phone: 416.661.7744 • Fax: 416.661.3574

UPPER CRUST REPORT ON FORCED LABOUR IN CANADIAN SUPPLY CHAINS

INTRODUCTION

This report outlines Upper Crust's governance process, existing measures, and progress made in the 2023 fiscal year to prevent and mitigate the risks of modern slavery across our supply chains.

REPORTING CONTEXT

Upper Crust is a private Ontario Corporation subject to the legal requirements in Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act). This Report is made pursuant to the Act and was approved by the Director of Upper Crust on May 31, 2024.

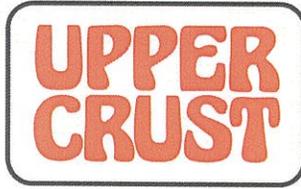
OUR CORPORATE STRUCTURE AND BUSINESS ACTIVITIES

Upper Crust is a privately held company with three manufacturing facilities located in Toronto, Ontario. Upper Crust has been serving the Foodservice and Retail market channels with premium quality bakery goods. Our product reach extends across the entire globe serving our partners in the USA, Asia, Europe and the Americas.

OUR SUPPLY CHAIN

Upper Crust sources the majority of its ingredients from Canada and the United States. We also import some ingredients from Malaysia, Brazil, Europe, New Zealand, Mexico, Chile, Ivory Coast and Ghana.

Upper Crust also sources labour for its manufacturing facilities from various Temporary Employment Agencies located in the Greater Toronto Area.



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OUR POLICIES AND STANDARDS

Before Upper Crust enters into any business relationship with a supplier, whether for ingredients or labour, that supplier must review and agree to our Supplier Code of Conduct. The Supplier Code of Conduct reinforces our requirements and expectations for conducting business and expected behaviours, and includes a statement on Upper Crust's commitment to human rights. The Supplier Code of Conduct reiterates our position against the use of forced labour and child labour and contributes to ensuring that no forced or child labour is used in our supply chain. As part of our commitment to human rights, Upper Crust stands firmly against the use of forced labour and child labour in our operations and across our supply chain.

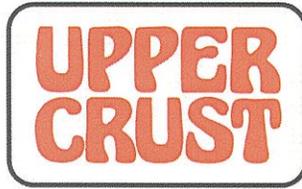
OUR EXPECTATIONS ON REPORTING VIOLATIONS

Upper Crust provides resources to report concerns. We also encourage the reporting of actual or potential non-compliances with our policies or legal requirements, including those in relation to forced labour and child labour so they can be addressed accordingly.

Every report is taken seriously. We also provide immunity from disciplinary action for good faith reporting of incidents and issues. There are several avenues in place for personnel to report issues depending on the nature of the problem, including the use of Upper Crust's Whistleblower System, a safe, secure, and confidential 24-7 helpline system. The Whistleblower System is operated by an external, independent provider and submissions can be made by all Upper Crust stakeholders online or via telephone.

OUR ACTIONS ADDRESSING MODERN SLAVERY RISKS

Our use of Temporary Help Agencies (THAs) presents our highest risk for human rights violations, including child and forced labour. In accordance with our processes, all THAs are required to adhere to our Supplier Code of Conduct. They must be a registered THA, with the Province of Ontario. Our THA's are screened and onboarded through our Human Resources team.



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Each of our THA's must adopt and accept our Temp Agency Employment Standards which sets out the standard of business behaviours expected of our labour suppliers. The Temp Agency Employment Standards reinforces our commitment that no child labour or forced labour be used, and the freedom of personnel to raise concerns without fear of reprisal. This policy also allows Upper Crust to audit each of our THA's on an annual basis, which is carried out by our HR department.

In 2023, no THA's were found to have forced labour or child labour issues.

OUR REMEDIATION MEASURES

Since Upper Crust processes and audits did not yield any evidence of forced labour or child labour, we did not implement any remediation measures in the 2023 fiscal year.

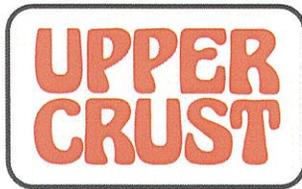
OUR TRAINING AND AWARENESS

Upholding human rights, including both forced labour and child labour, is addressed in our annual training conducted by the Human Resources department. All Upper Crust team members and THA employees are required to attend, understand, and comply with the principles and requirements set out in our Code of Conduct and Business Ethics.

ASSESSING OUR EFFECTIVENESS

Upper Crust remains committed to creating a resilient and transparent supply chain where the human rights of every worker are respected. Upper Crust continues to investigate and track all internal and external (through our Whistleblower System) issues. We also perform risk-based assurance activities on a regular basis consisting of our annual audits of third party suppliers.

Upper Crust remains committed to identifying and eliminating forced labour and child labour in the global supply chain. This is a complex social, economic and governance issues that will require cooperation across industry, suppliers, governments and other organizations. We will continue to enhance our



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contractual language where possible to ensure the protection of workers from the violation of their human rights. We will continue trying to identify new risks. We will continue trying to enhance and develop additional due diligence policies and process that will help us address and stop the use of forced labour and child labour in our activities and supply chain.

REPORT APPROVAL AND ATTESTATION

In accordance with the requirement of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the Report for Upper Crust. 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 2023 reporting year.

I have the authority to bind Upper Crust.

A handwritten signature in black ink, appearing to read "Carmela Serebryany", written over a horizontal line.

Carmela Serebryany
President and CEO
Date: May 31, 2024