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Bank Bros. & Son Limited("BBS")/Hubbert's Processing and Sales Inc. o/a Bank Brothers Sustainable Ingredients ("BBSI")/2170886 Ontario Inc.("2170886")

BBS

7-100 Wingold Ave, Toronto ON M6B 4K7

BBSI

109 East Dr., Brampton, ON L6T1B6

To: Minister of Public Safety

Re: Fighting Against Forced Labour and Child Labour (FLCL) in Supply Chains Act Annual Report

Dear Honourable Dominic LeBlanc,

2170886 Ontario Inc. ("2170886") has prepared this inaugural Annual Report to meet obligations as an in-scope reporting entity under the *Fighting Against Forced and Child Labour in Supply Chains Act* (the "Act"). In accordance with S.11(1) of the Act, the report identifies the steps 2170886 has taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by 2170886, or of goods imported into Canada by 2170886.

This Report has been prepared on behalf of the Board of Directors of 2170886 for the financial reporting year beginning May 01, 2023 ending on April 30, 2024.

## Attestation,

"In accordance with the requirements of the Act, and in particular section 11 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."

Mark Bank

Vice President(BBS/2170886)/Secretary(BBSI)

May 16, 2024

Signed.

I have the authority to bind BBS/BBSI and 2170886.

## Reporting Entities:

- 1.0 Bank Bros. & Son Limited (BBS) Business Number 100389873
- 2.0 Hubbert's Processing and Sales Inc. o/a Bank Brothers Sustainable Ingredients (BBSI) Business Number 721798098

Number of employees (total for both companies): 150

## Corporate structure:

Wholly owned operating subsidiaries of 2170886 Ontario Inc. Business Number 808145817

Financial reporting year: May 1, 2023 to Apr 30, 2024

## **Business Activities:**

- -Processing of beef by-products (Hides, fats and oils, protein)
- -Importation of production equipment, services and packing materials from USA and other countries.

## Activities and risk of FLCL:

Purchase of Animal by-products from Canadian supply sources. Production machinery and packing materials from foreign sources. We have assessed there is virtually no risk that FLCL is used in any of our supply sources.

# Policies, due diligence and measures taken:

When purchasing supplies from foreign and domestic sources, all measures are taken to ensure that to the best of our suppliers' knowledge that none of the supplies come from sources that use FLCL. This includes in-depth discussions with suppliers where there is determined to be any reasonable chance that there is use of FLCL in the supply of a product or service. If suppliers cannot provide adequate assurance to this effect, they will be denied any future contracts. All suppliers are subject to this review and remediation.

The only parts of our supply chains that carry any risk would be packaging materials that are manufactured outside of North America. We have determined through discussions with these suppliers that all necessary measures have been taken to ensure that FLCL is not part of this supply. Distributors of these products must attest that to the best of their knowledge there is no FLCL used in the manufacture or transportation of the products we are buying and that they comply with all local laws to this effect.

# BBS - Overview of supply chain and risks:

## Products produced:

Wet-salted cattle hides, yellow grease (by-product)

## Supply sources:

- Beef and cow hides from medium and large CFIA inspected slaughterhouses in Canada (virtually zero risk of FLCL)
- Production machinery and equipment from Canadian and USA suppliers (virtually zero risk of FLCL)
- Packaging Materials from China and India (no known risk of FLCL as per supplier attestations)

# BBSI - Overview of supply chain and risks:

#### Products produced:

Edible and non-edible fats, oils and proteins

### Supply Sources

- Canadian suppliers of lard, tallow and fats (zero risk of FLCL)
- Production machinery, equipment and packing supplies from North American suppliers (virtually zero risk of FLCL)

## **Employee Training:**

All employees involved in procurement of supplies are required to understand the necessary measures that are being taken to ensure that there is no risk of FLCL in our supply.

#### Effectiveness:

Annual review to determine the level of assurance that has been derived from our policies that deal with FLCL.

The above report has been approved by the Board of Directors of 2170886 Ontario Inc.

Henry Bank, President