



## **Annual Report *Fighting Against Forced Labour and Child Labour in Supply Chains Act***

### **Ardent Mills ULC**

Reporting Year FY 2024

#### **Introduction**

Ardent Mills ULC (“Ardent Mills”) prohibits the use of child and forced labor. Ardent Mills does not employ or benefit from child labor, prison or other forced or compulsory labor. We conduct business in a manner consistent with applicable employment and human rights laws, including legal working age and anti-slavery.

At Ardent Mills, corporate responsibility is a process of continually improving our standards, our actions, and our processes. We are committed to being an industry leader in corporate responsibility in all aspects of our operations. Ardent Mills is committed to treating people with dignity and respect in the workplace and in the communities where we do business. We are committed to engaging with and nourishing the communities in which we live and work. In line with our policies, we do not accept or support the use of illegal, abusive, or forced labor.

The issue is challenging, and we alone cannot solve this complex problem. We believe it is essential that all parties in our supply chains work together to support rural livelihoods, raise incomes, and ensure children and adults are not subject to illegal, or abusive working conditions. We work hard to provide all our own employees with an equitable, safe and supportive work environment providing competitive wages and the rights to join a union and voluntarily negotiate, and we expect the same from our suppliers. The Ardent Mills Supplier Code of Conduct requires that suppliers comply with applicable laws and regulations in the locations where they operate, including human rights laws. It also requires that suppliers comply with applicable employment laws, rules, and regulations, including those related to wages, work hours, employee benefits, employee and contractor safety and antidiscrimination. Further, Ardent Mills prohibits its suppliers from employing or benefitting from child, forced, or compulsory labor.

This report (the “Report”) has been prepared pursuant to Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). Ardent Mills’ affiliate is also subject to reporting requirements under California’s Transparency in Supply Chains Act.

## **Our Structure and Business**

- Ardent Mills ULC is a Nova Scotia unlimited liability company with a principal place of business at 27 Reid Drive, Mississauga, ON L5M2B1. Ardent Mills is a premier flour-milling and ingredient company with 3 facilities and more than 250 employees in Canada.

## **Our Supply Chains**

- Ardent Mills sources wheat and other agricultural products from Canada to produce flour, baking mixes and other products.
- Our trusted suppliers understand the importance of complying with our Supplier Code of Conduct and our expectations and standards are shared during all sourcing events. The RFI and RFP's that are released across all categories requires suppliers to acknowledge and adhere to our 'Supplier Code of Conduct'.
- Our procurement team has partnered with our ESG leadership as it pertains to "Responsible Sourcing" to help identify and understand where our suppliers and carriers are in their journey to help support our scope 3 emissions.
- Ardent Mills is a Roundtable member on Sustainable Palm Oil (RSPO) and has entered its fifth year of completing a supply chain audit certification on mass balance use of RSPO-certified sustainable palm oil.
- Based on our core value of Simplicity, our approach to safety is to make it as easy as possible to do the right thing at each stage of food production. From sourcing, to processing and preparation, to testing, packaging and transportation, our quality and safety standards never waver. We believe food safety should be ingrained across the entire supply chain, starting with raw materials. We follow comprehensive procurement and auditing processes to ensure we receive safe, high quality, materials that comply with regulations.

## **Our Policies and Due Diligence Processes**

- Ardent Mills' Code of Conduct outlines our company's ethical and compliance standards for conducting business throughout the world. Our Code is grounded in our values of Trust, Serving, Simplicity and Safety, which are ingrained in our company culture, and forms the foundation for the ethics and behaviors described in our Code. We make a positive impact upon our team members, customers, communities, and partners by:
  - Establishing and nurturing TRUST every day, always operating with reliability and integrity.

- SERVING others with understanding, respect, and care.
- Operating with SIMPLICITY, clarity, and transparency, removing barriers and letting people do what they do best.
- Ensuring the SAFETY of our products and people; doing what's best to create the safest environment now and for the future.

Every employee receives an introduction to the Code of Conduct, followed by yearly training to ensure employee's actions align with the company's commitments to ethical business conduct.

- Ardent Mills' Code of Conduct prohibits use of child and forced labor. Ardent Mills does not employ or benefit from child labor, prison or other forced, or compulsory labor. We conduct business in a manner consistent with applicable employment and human rights laws, including legal working age and anti-slavery.
- Ardent Mills provides appropriate working conditions and wages. Ardent Mills prohibits the use of forced labor, including human trafficking and slavery, in all our operations. Accordingly, any work performed by a team member that is involuntary and/or performed under threat of physical harm or other penalty is prohibited. In addition, all Ardent Mills team members must comply with all applicable child labor laws. Ardent Mills requires suppliers to adhere to these same standards within their operations. We pay regular, competitive wages and provide appropriate benefits, and we invest in resources to assist team members who want to develop to their full potential. Our team members have a right to freedom of association and collective bargaining. Ardent Mills complies with all applicable wage and hour laws.
- Ardent Mills is committed to conducting business according to the highest ethical standards and expect its suppliers to conduct business responsibly, with integrity, ethics and transparency. Ardent Mills expects suppliers to treat their employees and personnel in a manner that is dignified and respectful and treat the communities in which they do business in a socially and environmentally responsible manner. Accordingly, Ardent Mills expects, at a minimum that its suppliers will adhere to the business conduct standards outlined in Ardent Mills' Supplier Code of Conduct, and will read, understand, and abide by Ardent Mills' Code of Conduct. A supplier's failure to comply with the Supplier Code of Conduct may jeopardize Ardent Mills' willingness to conduct business with a supplier.
- Ardent Mills Supplier Code of Conduct expects suppliers to abide by Ardent Mills Code of Conduct. Specifically, suppliers shall not employ or benefit from child labor, prison or other forced, or compulsory labor. Suppliers shall conduct business in a manner consistent with applicable employment and human rights laws, including legal working age and anti-slavery. Suppliers shall comply with applicable laws and regulations in the locations where it operates, including licensing, environmental and human rights laws. Unlawful employment of children is

prohibited in the production of the Company's products or the supply of materials or services to the Company.

- We understand, respect, and care for our communities. We apply our knowledge and expertise to help meet economic, environmental, and social challenges in communities where we live and work. By working together with a wide range of public and private partners, our team members and business partners contribute time, talent, and financial resources to help make measurable progress against the difficult issues that no one organization alone can solve. This is an important part of our commitment to being a responsible corporate citizen and to that end, we hold ourselves to high standards and encourage others to do the same.
- Ardent Mills has a background verification policy to ensure that all applicants undergo a background check before being hired. Ardent Mills applicants verify their age in the application process. Ardent Mills does not employ any individuals under the age of 18. Ardent Mills also retains valid age verification records for all team members.

### **Risks of Forced Labour and Child Labour in our Business and Supply Chains**

- Ardent Mills is in the process of developing a forced labour and child labour prevention and remediation policy.
- Ardent Mills has a Code of Conduct and Supplier Code of Conduct that are included in its contracts with suppliers to ensure supplier compliance.
- The United Nations Sustainable Development Goals (SDGs) is a voluntary framework with 17 global goals designed to accelerate advancement toward a more sustainable world by 2030. Ardent Mills' business practices are aligned with four specific goals where we believe we can make the greatest impact: zero hunger (Goal 2), decent work and economic growth (Goal 8), responsible consumption and production (Goal 12), and climate action (Goal 13).

### **Measures Taken to Remediate Forced or Child Labour**

- Ardent Mills is not currently aware of any instances of forced or child labour in its activities or supply chain.
- See above for discussion on measures taken by Ardent Mills to remediate forced or child labour.
- Ardent Mills maintains an Ethics Open Line for employees and contractors to report concerns.

### **Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families that Result from any Measures taken to Eliminate the Use of Forced or Child Labour in our Activities or Supply Chains**

- Ardent Mills is not currently aware of any loss of income to the most vulnerable families resulting from any measures taken to eliminate the use of forced or child labour in its activities or supply chains.

### **Employee Training**

- All Ardent Mills employees are trained annually on Ardent Mills Code of Conduct, which is a mandatory requirement of Ardent Mills. The Code of Conduct training contains various topics that change year to year. Ardent Mills is assessing whether a specific module on child or forced labour may be implemented in the future.

### **Measuring Our Effectiveness**

- Ardent Mills through its Ethics Open Line tracks the number of grievances submitted annually and compares year-over-year trends. Ardent Mills also continues to assess its policies and processes with respect to child and forced labour in its supply chains to determine where improvements may be made.

For more information, please see Ardent Mills Code of Conduct (available at: <https://www.ardentmills.com/media/1bihaynk/ardent-mills-code-of-conduct-english.pdf>) and Supplier Code of Conduct (available at: <https://www.ardentmills.com/media/4k3cphxt/am-supplier-code-of-conduct.pdf>).

## Approval and Attestation

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.

DocuSigned by:  
  
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**Buck Vanniejenhuis**

**General Manager**

**5/31/2024**

I have authority to bind Ardent Mills ULC