

Aspire Bakeries B.C. ULC Compliance with Canadian Bill S-211

This report describes Aspire Bakeries B.C. ULC's (Aspire Bakeries) position and approach to the important issue of Slavery and Human Trafficking. In compliance with Canadian Bill S-211, Aspire Bakeries is disclosing our policies and procedures established to combat slavery and human trafficking.

Steps Taken to Address Slavery and Human Trafficking:

- Based on our analysis, Aspire Bakeries has not identified legal work duties for anyone under eighteen within our bakery operations. As a matter of policy, Aspire Bakeries does not hire anyone under the age of eighteen for any purpose. During the hiring process, the age of the prospective employee is verified by Aspire Bakeries Human Resources Department.
- All vendors supplying Aspire Bakeries with temporary workers are required to abide by this policy and shall furnish the date of birth for every worker placed within an Aspire Bakeries facility at the time of placement.
- Our Internal Code of Conduct prohibits slavery and human trafficking. Aspire Bakeries employees and management, who have direct responsibility for supply chain management complete annual training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chain of products.
- Aspire Bakeries requires our primary raw material suppliers to comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Aspire Bakeries requires all suppliers/vendors to sign our Supplier Code of Conduct which specifically prohibits slavery and human trafficking.
- Aspire Bakeries reserves the right to verify the Suppliers' compliance with our Code of Conduct. If Aspire Bakeries becomes aware of any actions or conditions that are not in compliance with the Supplier Code of Conduct, Aspire Bakeries reserves the right to demand corrective measures. Furthermore, Aspire Bakeries reserves the right to terminate an agreement with any Supplier/ Vendor who does not comply with the Supplier Code of Conduct.

Human Rights Section from Employee Code of Conduct

Aspire Bakeries prohibits the use of:

- Child Labor: The Company complies with all applicable child labor laws and prohibits using workers under the legal age of employment in the relevant country or where work interferes with schooling requirements under applicable local laws and regulations.

Aspire Bakeries' policy is not to hire any worker who is less than eighteen years old regardless of the legal age of employment in the relevant country.

- **Forced Labor:** The Company prohibits the use of prison labor; forced labor; labor under any form of indentured servitude; physical punishment; confinement; threats of violence; or any other forms of abuse. The Company will not tolerate any psychological, verbal, sexual or physical harassment or any other form of abuse and will comply with all applicable laws on harassment and abuse of employees.
- **Slavery & Human Trafficking:** The Company forbids the use of slavery or human trafficking (including debt bondage) and abides strictly to local acts such as US Code, Title 22, Chapter 22, and the California Supply Chain Transparency Act of 2010. Employees must comply in all countries in which the Company operates facilities or does business and with Canada's Immigration and Refugee Protection Act.

Human Rights Section from Supplier/Vendor Code of Conduct

We expect our vendors to conduct their activities in a manner that respects human rights as set out in the United Nations Universal Declaration of Human Rights. Minimally, we expect vendors to comply with the following employment-related practices:

- **Applicable Local Labor Laws:** All business activities of vendors must comply with all national and local legal requirements along with published industry standards pertaining to employment and manufacturing in the applicable country. Vendors must demonstrate that all employees are eligible to work in the applicable country.
- **Forced Labor:** Vendors must not use prison labor, forced labor, labor under any form of indentured servitude, physical punishment, confinement, threats of violence, or any other forms of abuse. Vendors shall not retain workers' government-issued identification, passports or work permits as a condition of employment.
- **Slavery & Human Trafficking:** The use of slavery or human trafficking (including debt bondage) by vendors is forbidden.
- **Child Labor Practices:** Vendors must comply with all applicable child labor laws and are prohibited from using workers under the legal age of employment in the relevant country or where work interferes with schooling requirements under applicable local laws and regulations. Vendors shall not hire any worker who is less than fifteen years old regardless of the legal age of employment in the relevant country. Vendors shall not assign any worker to work in any Aspire Bakeries facility who is less than eighteen years of age, regardless of the legal age of employment in the relevant country. In the event of an incident of child labor at a vendor's facility, Aspire Bakeries must be notified of the incident and the vendor must provide corrective action plans within forty-eight (48) hours.

Vendors should maintain accurate and transparent books, records, and accounts to demonstrate compliance with applicable laws and regulations, and this Code. Aspire Bakeries reserves the

right to verify vendors' compliance with the Code. If Aspire Bakeries becomes aware of any actions or conditions that are not in compliance with the Code, Aspire Bakeries reserves the right to demand corrective measures. Aspire Bakeries reserves the right to terminate an agreement with any Vendor who does not comply with the Code.

Section 11- Mandatory Information

- The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity
 - To be employed within our facilities, Aspire Bakeries requires a minimum age of eighteen years. Our comprehensive system of internal policies and procedures including our Employee Code of Conduct is reviewed and signed by all employees and the Slavery and Human Trafficking training is in place to educate employees on this important issue. Aspire Bakeries' external Supplier/Vendor Code of Conduct Policy sets the standard that vendors employees should be fifteen years or older, and our 1:1 meetings with our suppliers focused on what they are doing to combat slavery and human trafficking in their supply chain emphasize our focus on eliminating it from our supply chain.
- Its structure, activities, and supply chains
 - Aspire Bakeries produces baked goods made with simple ingredients, care, and authenticity. The breadth and depth of our portfolio allows us to provide innovative solutions as a leading bakery manufacturer in North America. Our core portfolio items include: Artisan bread, traditional bread, cookies, muffins, doughnuts, laminates, and sweet baked goods.
 - Aspire Bakeries operates three bakeries in Canada, and ten bakeries in the United States, our corporate office is in Los Angeles, CA.
 - Aspire Bakeries employs 2401 US employees.
 - Aspire Bakeries employs 1408 Canadian employees.
 - Our Canadian Entity/Corporation is Aspire Bakeries B.C. ULC
 - Our Unites States Entity/Corporation is Aspire Bakeries LLC
 - Our procurement team is responsible for purchasing the commodities used at our bakeries.
 - The only item imported into Canada by Aspire is IREP butter for production used for an American customer; it is only one item, butter, and this is all from one supplier in California where it is produced.
 - Aspire Bakeries does not own any farms, mills, or transportation services.
 - Aspire Bakeries purchases our commodities from suppliers that adhere to our Vendor Code of Conduct.

- Its policies and due diligence processes in relation to forced labor and child labor
 - Internal Policy: Aspire Bakeries has an Employee Code of Conduct with a Human Rights Section (covered in this report).
 - External Policy: Aspire Bakeries has a Supplier/Vendor Code of Conduct policy with a human rights section (covered in this report).
 - Supplier Meetings: Aspire Bakeries hosts meetings with our key suppliers where they provide details on how they are mitigating slavery and human trafficking.
- The parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk
 - Distributors that carry a diverse selection of materials where we do not have visibility of full producer supply chain is a risk.
 - Cocoa, Palm, and Sugar supplier meetings are held, during these meetings Aspire discusses human rights issues directly with our suppliers.
 - Aspire ensures that its suppliers have programs in place to combat forced labor and child labor.
- Any measures taken to remediate any forced labor or child labor
 - Not applicable, Aspire Bakeries has not identified any forced labor or child labor in our activities and supply chains.
- Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains
 - Not applicable, Aspire Bakeries has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labor or child labor in our activities and supply chains.
- The training provided to employees on forced labor and child labor
 - Aspire Bakeries Associates take a Social Accountability training annually focused on Slavery and Human Trafficking.
 - The virtual training is 25 min, the training is paired with questions and answers that require 100% pass rate.
 - The training was developed internally and it is mandatory for specific employees: The Corporate Social Responsibility Team, Human Resources (Central Services and Bakery), Procurement, Bakery Directors, and our Senior Operations Team.
 - 104 people are currently assigned to this training.
- How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains
 - Our system of polices and processes are designed to stop slavery and human trafficking from occurring at our facilities and throughout our supply chain, we

have a supplier code of conduct in place, and we host ongoing conversations with our suppliers to better understand their programs. We believe having our policies and supplier program in place contributes to eradicating slavery and human trafficking.

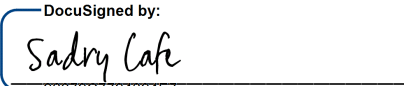
Aspire Bakeries B.C. ULC Canadian Bill S-211 Report Attestation

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.

Full Name: Sadry Cafe

Title: VP, Procurement

Date: 5/29/2024 | 12:42 CDT

Signature: 
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"I have the authority to bind 'Aspire Bakeries B.C. ULC.'"