

# **B&G Foods North America, Inc.**

## **B&G Foods Canada, ULC**

### **Sirops Maple Grove Inc.**

## **Fighting Against Forced Labour and Child Labour in Supply Chains Report 2023**

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### **Purpose**

This report is prepared by B&G Foods North America, Inc. (business no. 83437 3029) (“B&GNA”) and its wholly owned Canadian subsidiaries, B&G Foods Canada, ULC (business no. 83783 7889) (“B&G Foods Canada”) and Sirops Maple Grove Inc. (business no. 13905 0512) (“SMG”) and collectively with B&GNA, “B&G Foods,” the “Companies,” “we,” “our” or “us”) pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”) for the financial year ending December 30, 2023 (“fiscal 2023”). The report highlights steps we have taken during fiscal 2023 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 or of goods imported into Canada by B&G Foods.

B&G Foods is committed to providing quality products and observing high ethical standards in the conduct of our business. Together with our predecessors, we have been doing so since the 1800s. Our core values: *passion; food safety and quality; integrity and accountability; customer and consumer focus; safety and health at work; diversity, equity & inclusion; collaboration; and empowerment*, have been critical to our success. Our Code of Business Conduct and Ethics, referred to as our “Code,” serves as a guide for all directors, officers, employees and representatives of B&G Foods in our daily interactions with our customers, consumers, stockholders, regulatory agencies, supply chain partners and fellow employees.

Consistent with the requirements of our Code and our core values, we respect the personal dignity and individual worth of every human being and comply with all applicable human rights laws. At B&G Foods, it is the responsibility of each of our employees to maintain a work culture that supports human rights. Likewise, in establishing and maintaining relationships with our supply chain partners and other business partners, we expect the same commitment to high ethical standards and compliance with applicable laws, including those relating to human rights.

### **Structure, Activities, and Supply Chains**

B&GNA is a Delaware corporation and is the primary operating subsidiary of B&G Foods, Inc. (“B&G Foods Parent”), which together with its subsidiaries and predecessors, has been in business for over 130 years. B&G Foods Parent is listed on the New York Stock Exchange under the ticker symbol BGS.

B&GNA, which is headquartered in the United States, manufactures, sells and distributes a diverse portfolio of branded, high quality, shelf stable and frozen food and household products across the United States, Canada and Puerto Rico. B&GNA imports finished good food and household products into Canada and warehouses such products in Canada before selling such products to B&G Foods Canada.

B&G Foods Canada, a wholly owned subsidiary of B&GNA, is a British Columbia unlimited liability company headquartered in Mississauga, Ontario. B&G Foods Canada purchases finished goods from

B&GNA and third-party suppliers for subsequent sale to customers in Canada and from time to time outside of Canada. Most of the products purchased and sold by B&G Foods Canada are manufactured in the United States or Canada.

B&GNA purchases raw materials from growers, commodity processors, other food companies and packaging suppliers located in the United States, Canada and elsewhere internationally. A portion of the finished goods sold by B&G Foods in Canada are manufactured at one of B&GNA's twelve manufacturing facilities located in the United States and Mexico. The remaining finished goods are purchased by B&GNA or B&G Foods Canada from third-party co-manufacturers.

SMG, a wholly owned subsidiary of B&GNA, is a Quebec corporation headquartered in St. Evariste, Quebec. SMG purchases, processes and stores maple syrup in Quebec for subsequent export to the United States.

Collectively, B&G Foods had 2,912 employees as of the end of fiscal 2023, and averaged less than 250 employees in Canada during fiscal 2023.

## **Steps to Prevent and Reduce Risks of Forced Labour and Child Labour**

B&G Foods is committed to promoting values that foster and respect human rights, both inside and outside of our organization. We have several foundational policies in place that aim to prevent and reduce the risks of forced labour and illegal child labour in our activities and supply chains. These include B&G Foods' Code, Human Rights Policy and Supplier Code of Conduct. Our Code, Human Rights Policy and Supplier Code of Conduct include specific language on prohibiting the use of illegal child labour and forced labour and requiring compliance with all applicable laws and regulations relating to wages, work hours, overtime, and benefits.

B&G Foods employees are required to attest that they have reviewed and acknowledge our Code and Human Rights Policy upon joining B&G Foods and annually thereafter. Additionally, our employees are required to take a mandatory focused course on our Code annually, including in 2023.

In addition to our Supplier Code of Conduct, which outlines our expectations for suppliers when working with us, B&G Foods' standard supply agreement contract language includes provisions in which the supplier represents and warrants that all goods sold under the agreement comply with all applicable laws, including all applicable laws regarding slavery and human trafficking of the country or countries in which they are doing business. We send our Supplier Code of Conduct to our suppliers, and it is also available at the Responsibility section of our website at <https://bgfoods.com/about/responsibility/>.

B&G Foods has a centralized sourcing and procurement function for raw materials, finished goods, supplies and equipment. This structure helps promote compliance with our policies and procedures.

Finally, B&G Foods has a compliance and ethics portal (available at [www.bgethics.com](http://www.bgethics.com)) for employees, suppliers, customers, other third party business partners, and the general public to confidentially and anonymously raise issues, ask questions, and report any non-compliance with any of our policies, including those related to the use of illegal child labour and forced labour. Reports can be made via phone call or through an online platform.

## **Policies and Due Diligence Processes**

B&G Foods has several foundational policies in place aimed to prevent and reduce the risk of forced labour and illegal child labour in our activities and supply chains, including our Code, our Human Rights Policy and our Supplier Code of Conduct.

These codes and policy apply to the Companies and include specific language prohibiting the use of illegal child labour and forced labour and requiring compliance with all applicable laws and regulations relating to wages, work hours, overtime, and benefits. These policies are available to our employees on our employees, suppliers, customers, third-party business partners and the general public at the Responsibility section of our website at <https://bgfoods.com/about/responsibility/>.

Failure by employees of B&G Foods to comply with our Code or our Human Rights Policy subjects violators to disciplinary action, up to and including termination of employment.

We also extend our commitment to human rights to stakeholders in our supply chain including co-packers, suppliers and other supply chain partners to support these principals in their workplaces, and send our Supplier Code of Conduct to, and expected compliance therewith by, our suppliers. B&G Foods reserves the right to terminate its business relationship with any supplier or other third-party business partner that fails to demonstrate compliance with our Human Rights Policy or Supplier Code of Conduct, including the provisions relating to forced labour and illegal child labour.

B&G Foods has a compliance and ethics portal (available at [www.bgethics.com](http://www.bgethics.com)) for employees, suppliers, customers, other third party business partners and the general public to confidentially and anonymously raise issues, ask questions, and report any non-compliance with any of our policies, including those related to the use of illegal child labour and forced labour. Reports can be made via phone call or through an online platform.

In accordance with our non-retaliation policy, B&G Foods prohibits retaliation against any employee who seeks advice, makes a good faith report of a concern to B&G Foods or any relevant government authority, or participates in a related investigation. Every report made is reviewed and/or investigated by B&G Foods' Compliance & Ethics Department in partnership with relevant internal stakeholders and business units, depending on the subject matter of the report. From there, appropriate corrective actions are taken as necessary, depending on the investigation results.

## **Forced Labour and Child Labour Risks**

B&G Foods has not undertaken a formal process to identify parts of our supply chains that carry a risk of forced labour or illegal child labour. Our suppliers are mostly businesses based in the United States and Canada, many of which have their own established policies prohibiting the use of forced labour and illegal child labour in their own businesses and supply chains. We do, however, source certain raw materials and finished goods from third parties located outside of the United States and Canada. We recognize that there may be a risk of forced labour or illegal child labour at all levels of our supply chain, particularly concentrated in portions of our supply chain located outside of the United States and Canada where we may have little visibility or control. As such, we rely on the cooperation of our major suppliers with whom we have direct contractual relationships to meet the highest standards of ethics outlined in our Human Rights Policy and Supplier Code of Conduct. We also train our procurement employees to be on the lookout for any signs of forced labour or illegal child labour risk within our supply chains.

Within our own internal operations, which are located in the United States, Canada and Mexico, we consider our exposure to forced labour and illegal child labour risks to be low. When hiring new employees, B&G Foods confirms employees are legally able to work in the country in which they are employed and are recruited voluntarily, in compliance with employment standards therein.

## **Remediation Measures and Remediation of Loss of Income**

B&G Foods has not undertaken a formal process to identify parts of our supply chains that carry a risk of forced labour or illegal child labour. In 2023, no instances of forced labour or illegal child labour in our own activities or in our supply chains were brought to our attention through grievance processes, our compliance & ethics hotline or through other sources; therefore, no remediation measures were undertaken. Accordingly, no measures were taken to address any resulting loss of income to vulnerable persons. In the event that any future investigation identifies potential or confirmed instances of illegal child labour or forced labour, we will take appropriate remediation measures.

## **Training**

Our Code, our Human Rights Policy and our Supplier Code of Conduct are road maps for doing business the right way. These codes and policy cover a variety of topics, including B&G Foods' commitment to upholding human and workplace rights throughout our global operations. With respect to the use of forced labour and child labour, these codes and policies specify that B&G Foods operates under programs and policies that prohibit child labour, forced labour, and human trafficking.

New hires are required to complete an online training on the Code within 30 days of their start date. As part of the training, employees are required to acknowledge that they have completed the training on the Code, have read and understand and will comply with the Code's guidance, and agree to promptly report any act or situation that may violate our Code.

Furthermore, our employees, including senior management and executive-level staff, are required to take an online course on the Code annually, including in 2023, and we track employee completion of this training.

Employees, upon hire and annually thereafter, are also required to acknowledge that they have read and understand our Code and our Human Rights Policy.

## **Assessing Effectiveness**

B&G Foods has not taken any formal actions to assess effectiveness in ensuring that forced labour and illegal child labour are not being used in our activities and supply chains. However, in 2023, no instances of forced labour or illegal child labour in our own activities and/or in our supply chains were brought to our attention through grievance processes, our compliance & ethics portal or through other sources.

## **Attestation**

This report has been prepared in accordance with Part 2, section 11 (1) and 11 (3) of the Act for the financial year ending December 30, 2023 and applies to B&GNA, B&G Foods Canada and SMG. Pursuant to subparagraph 11(4)(b)(ii) of the Act, the report has been approved by the Board of Directors of B&GNA.

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 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.

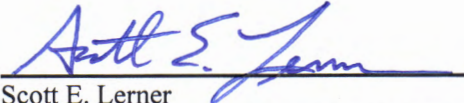
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Scott E. Lerner

Executive Vice President, General Counsel, Secretary and Chief Compliance Officer of  
B&G Foods North America, Inc.

I have the authority to bind B&G Foods North America, Inc., B&G Foods Canada, ULC and Sirops  
Maple Grove Inc.

May 31, 2024



Scott E. Lerner

Executive Vice President, General Counsel, Secretary and Chief Compliance Officer of  
B&G Foods North America, Inc.

I have the authority to bind B&G Foods North America, Inc., B&G Foods Canada, ULC and Sirops  
Maple Grove Inc.

May 31, 2024