

# 2024 Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

#### Introduction

This report has been prepared by Bariatrix Nutrition Inc. ("Bariatrix") in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for our financial year ending June 30th, 2023.

Bariatrix is committed to promoting labour practices that protect the human rights of workers in our operations and supply chains, including preventing and mitigating the risks of forced labour and child labour.

# Organizational structure, activities, and supply chain

Bariatrix is a private company headquartered in Lachine, Quebec. We manufacture third-party branded high-protein nutrition products, such as high protein bars, snacks, wafers, drinks, meal replacements and shakes, and provide custom packaging. Our products are sold to leading brands, private labels and commercial and medical centers who market and sell the products to the end use consumers. We have 125 employees in Canada, located at our head office and at a distribution center located in Dorval, Quebec.

Our operations outside of Canada are conducted through subsidiaries in France and the United States: Bariatrix Nutrition Corp. operates a manufacturing facility and distribution center in Vermont; and Bariatrix Europe operates as a contract manufacturer of high protein products, dietary supplements and private label meal replacements in France.

Our supply chain consists of food products (ingredients) and packaging. Most of our products are sourced directly from manufacturers located in Canada, the United States and Europe.

We are required under food safety regulations to trace the origin of each ingredient in our products and, as a result, have visibility over our food product supply chain. Our ingredients are primarily sourced from manufacturers in the United States, which accounts for 75% of our overall procurement spending. Other sources include Europe (15%) and Asia or Latin America (10%).

We procure most of our ingredients from reputable international suppliers who are responsible for reporting on processes and due diligence relating to forced labour and child labour under the laws in the jurisdictions in which they operate, including in the United States, United Kingdom, Germany, and Australia.



# Steps to prevent and reduce the risks of forced labour and child labour

In this reporting year, Bariatrix's approach to preventing and reducing the risks of forced labour or child labour focused on ensuring safe workplace practices in our facilities and operations and engaging with our suppliers on the source of goods in our supply chain. As a relatively small Canadian company, we rely on the processes and due diligence efforts of our international suppliers, who have greater leverage to influence human rights in the global supply chain, including to prevent and remediate the risks of forced labour and child labour.

## Policies and due diligence processes

Bariatrix has established health and safety programs at our operations and distribution facilities, to ensure compliance with applicable safety, human rights and employment standards laws. Our *Harassment Policy* prohibits forced overtime and details the complaint processes that are available to employees to report violations of Bariatrix's policies and standards. These policies apply to our permanent, and contract workers in our manufacturing facilities. All workers in our operations are subject to minimum age requirements.

Bariatrix has also established compliance programs relating to food quality and safety, which requires mapping our ingredient supply chain. We trace the country of origin of each ingredient and require our raw material and packaging suppliers to obtain the Global Food Safety Initiative (GFSI) certification, The GFSI certification requires companies to successfully undergo third-party audits of their operations. We track distributor and manufacturer information across our supply chains and investigate any discrepancies in this documentation.

#### Forced labour and child labour risk

In this reporting period, we have not identified risks of forced labour and child labour impacting our operations or supply chains. Our operations and the majority of our direct suppliers are located in jurisdictions that are at lower risk of forced labour or child labour because of legal protections in place for workers.

We are aware that government and international agencies have identified risks of forced labour and child labour in the global food supply chain, including with respect to food manufacturing facilities and farm workers. As more public information becomes available about these risks, we will continue to engage with our suppliers on the steps, processes, due diligence and risk assessment practices taken to protect the rights of workers.

#### Remediation measures and remediation of loss of income

Bariatrix encourages the reporting and investigation of all human rights violations and does not tolerate direct or indirect acts of retaliation made in response to a good faith report. Our *Harassment Policy* describes the reporting mechanisms available to our workers to report any potential violations of our safety and workplace policies and standards in our manufacturing operations. We encourage our direct suppliers to contact Bariatrix's Head of Procurement to report any potential violations.



To date, Bariatrix has not identified risks relating to forced labour or child labour in our operations or supply chain and, accordingly, has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

## **Employee training**

During the onboarding process, workers in our operations are provided with training related to workplace conditions, including health and safety. To date, we have not developed training for employees that specifically addresses the risks of forced labour or child labour in our supply chains.

# **Assessing effectiveness**

Beyond applying our existing programs to assess workplace safety in our operations and assess food quality and safety in our supply chains, we have not developed programs to assess the effectiveness of our approach to preventing and assessing the risks of forced labour and child labour in our operations and supply chains.

# Approval and 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.

Dated in the City of Lachine, Quebec, this \_\_\_\_ day of May, 2024.

Bariatrix Nutrition Inc.

Patrick Egger, President

I have the authority to bind Bariatrix Nutrition Inc.