



This Report is made on behalf of Barilla Canada Inc. (“BCI”) and Catelli Montreal Inc. (“CMI”) pursuant to section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act covering the fiscal year January 1, 2023 to December 31, 2023.

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

### *Structure*

BCI and CMI are wholly owned subsidiaries of the Barilla Group (“Barilla”), a private, family-owned business founded in Parma, Italy in 1877. BCI is a corporation created pursuant to the *Business Corporations Act* (Ontario). CMI is a federal corporation created pursuant to the *Canada Business Corporations Act*.

### *Activities*

BCI sells pasta products in Canada under the brand names, Barilla, Catelli, Lancia, and No Yolks. CMI has a production facility in Montreal, Quebec. BCI and CMI employ over 200 employees in Ontario and Quebec. BCI also imports products from Italy and the United States for sale in Canada.

### *Supply Chains*

In selecting suppliers, Barilla gives preference to suppliers that maintain respect for human rights. As identified in Barilla’s Code of Ethics, Barilla commits to not use, even indirectly, forced and compulsory labour or child labour. This includes the use of compulsory labour or child labour in any of Barilla’s supply chains. Barilla’s suppliers are required to comply with Barilla’s Code of Ethics and the laws of the countries in which Barilla operates, including child and forced labour laws. Suppliers of promotional materials are periodically audited in accordance with the Code of Ethics. The supply chains for BCI and CMI are not high risk for forced labour or child labour.

## **Entity’s Policies and Due Diligence**

Barilla’s Code of Ethics, which binds all Barilla personnel and suppliers, explicitly prohibits the exploitation of forced labour or child labour, whether directly or indirectly. Barilla mandates its suppliers to adhere to its Code of Ethics and the legal requirements of the countries in which they operate, including laws concerning forced or child labour through written contracts. Barilla conducts due diligence using third party tools to ascertain whether there are judgments against suppliers for violations of laws regarding forced labour or child labour. Should such judgments against a supplier occur, Barilla will take all necessary measures to comply with its Code of Ethics. The company also conducts quality audits and visits to its direct supplier locations while maintaining a close partnership with them.

In 2011, Barilla joined Sedex (Suppliers Ethical Data Exchange), an online platform facilitating information exchange between suppliers and customers across four critical areas: labour standards, health and safety, environmental practices, and business integrity. Since 2012, Barilla has



mandated all suppliers based in high-risk or low-regulation countries to participate in this initiative, necessitating them to share self-assessments and audit procedures regarding these focal points.

Barilla is committed to swiftly investigating any reports of forced or child labour within its supply chain and will promptly act against any supplier involved in such practices. It will only engage in commercial relationships with suppliers who accept the conditions outlined in the Code of Ethics. Should Barilla identify any actions or conditions contrary to the Code of Ethics, it retains the right to mandate corrective actions or terminate the commercial relationship. Moreover, Barilla maintains the authority to conduct unannounced inspections of suppliers and their business operations throughout the supply chain. If an employee becomes aware of any potential violation of the Code of Ethics or applicable laws, they are obligated to report such instances. Employees engaging with noncompliant suppliers will face disciplinary measures, including possible termination, if found to have known or should have known about the supplier's involvement in forced or child labour.

### **Entity Business and Supply Chain Risks and Management**

Barilla has a steadfast commitment to upholding the rights of workers at every level, including its supply chain, with a firm stance against forced or child labour. As a part of this commitment, Barilla has developed appropriate tools and procedures for addressing, managing, and monitoring activities within its supply chain. Since 2011, Barilla has been an active participant in the United Nations Global Compact, the world's largest voluntary corporate citizenship initiative. Additionally, Barilla has pledged adherence to several international frameworks dedicated to the protection of human rights, including the United Nations Universal Declaration of Human Rights, the Fundamental Conventions and Recommendations of the International Labour Organization, and the Earth Charter, published by the Earth Council.

In supply chains where human rights issues may arise, Barilla develops specific projects or requests external certifications from suppliers to verify compliance with international ethical and social standards regarding child or forced labour. The supply chains for BCI and CMI are not at high risk for child or forced labour. However, Barilla monitors the overall inherent risk of its supply chains for any indication that risk factors have changed.



## **Remedial Measures from Elimination of Forced Labour or Child Labour**

Barilla has taken measures to remediate forced labour or child labour in its supply chains. Barilla will continue to identify and address any gaps in its response.

Barilla has a grievance mechanism in place to address allegations of forced labour or child labour. This mechanism is based in Barilla's Code of Ethics. The Code of Ethics is binding on all Barilla employees, external collaborators, consultants, and suppliers. The Code of Ethics prohibits taking advantage, even indirectly, of either forced and obligatory labour or child labour. To enforce the Code of Ethics, Barilla has established a Group Compliance and Audit Committee (with Group-wide competency). Barilla has established various means of reporting violations of the Code of Ethics through email, an online platform, virtual or in person meetings, or anonymously in writing. If Barilla determines that a violation of the Code of Ethics has occurred, the committee will transmit a violation report and any appropriate suggestions to Barilla's top management or to the department affected by the violation. The department responsible for handling violations, taking into account applicable law and Barilla's system of disciplinary action, will define the applicable sanctions, implement them, and report back to the committee.

### **Entity Training**

All Barilla employees and suppliers are expected to know, understand, and abide by Barilla's Code of Ethics. It sets out principles on ethical behavior and good governance. These principles include respect for human rights, prevention of any form of worker exploitation (direct or indirect), and respect for all internationally recognized employee rights. In accordance with these principles, Barilla employees and suppliers are required to abide by the laws of the countries in which Barilla does business including the laws relating to modern slavery and human trafficking.

### **Entity Effectiveness Assessment**

Barilla has established communication channels for use by affected parties to communicate any concerns about compliance with the Code of Ethics and to report any violations of its rules of conduct. Any interested party can make an anonymous call to our Whistleblowing System at (833) 573-1751, send an email to [ethics\\_compliance@barilla.com](mailto:ethics_compliance@barilla.com), or connect to the secure Barilla Whistleblowing Platform at <https://secure.ethicspoint.eu/domain/media/en/gui/107752/index.html>

We will continue to review, build on, adapt and improve these systems and controls.



## Approval

This Report was approved by the board of directors of CMI on May 17, 2024, and the board of directors of BCI on May 17, 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 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.

Signed by

Name: Gino Rulli

Title: General Manager

Date: May 17, 2024

I have the authority to bind Barilla Canada Inc. and Catelli Montreal Inc.