



Bill S-211 Report – Fighting Against Forced Labour and Child Labour in Supply Chains Act.

FINANCIAL YEAR ENDED DECEMBER 31, 2023

Our Company

Since 1969, Bartek Ingredients has grown from its entrepreneurial roots with a dynamic spirit and disciplined focus in the manufacturing and global sales of food grade malic and fumaric acid. Our manufacturing facilities are located in Stoney Creek, Ontario, Canada.

As the world's most reliable producer of food grade malic acid and fumaric acid, we're focused on operating in a sustainable, socially responsible, and accountable manner. Bartek remains committed to delivering a superior quality product to ensure customer satisfaction, and we maintain registered standards for the quality management systems at our manufacturing facilities.

Reliably meeting the needs of major brands around the world while accommodating the unique needs of each, we've built our business with dedicated professionals and tenacious dedication to our customers and the markets we serve. We have been in business for over 50 years and supply our products in more than 40 countries worldwide.

Our Commitment

Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act requires certain commercial organizations to be transparent about efforts undertaken to identify and eradicate modern slavery and human trafficking from their supply chains and operations.

To our knowledge, all goods produced by Bartek Ingredients Inc. are manufactured in a socially responsible and accountable manner in accordance with the laws of Canada, the Province of Ontario and all other applicable statutes and standards.

The Company conducts its business using a set of policies that are similar to those listed in the Ethical Trading Initiative Code of Practice and the Social Accountability International SA8000 Code of Conduct. Specifically, as a long standing SEDEX member we do not directly employ child labour, forced labour, human trafficking, or any forms of slavery. We have in place systems to ensure Health and Safety in the plants, and we recognize the right of our employees to free association, fair pay and working hours and equal treatment under the laws of Canada.

We are dedicated to maintaining these commitments as a prerequisite for all current and future business activities and to conduct business responsibly, with integrity, honesty, and transparency.

Activities and Supply Chains

Bartek Ingredients Inc. is a Food Ingredients Manufacturer with a vertically integrated supply chain, and two production plants which produce feedstock and refine our finished products.

Steps Taken

With the recent implementation of the **Fighting Against Forced Labour and Child Labour in Supply Chains Act**, we are committed to evaluating, planning, implementing, and measuring various courses of action to reduce any potential risks in 2024. Some future actions that we will be considering include developing a policy, supply chain mapping, offering training to employees on forced and child labour, and including an enhanced Supplier Code of Conduct acknowledgment in our Supplier Self-Evaluation form.

Below we describe the current state of our approach to our policy, labour, environment, health and safety, and business ethics. For the next reporting period in 2024, we will build upon this foundation to explicitly address potential risks to Bartek Ingredients Inc. posed by forced labour and child labour in our supply chain.

Policies

Bartek's Social Responsibility and Accountability in Manufacturing Policy establishes a foundation for managing our business in accordance with our commitment to respecting human rights and fair competition, while operating in a socially responsible and accountable manner.

Additionally, Bartek's Supplier Code of Conduct maintains the expectation of our suppliers to uphold similar values and standards on Labour, Environment, Health and Safety, and Business Ethics as detailed below.

Labour

Bartek Ingredients Inc. expects its suppliers to follow all applicable laws and treat their employees in a humane and just manner. Suppliers shall not use, engage in or support child labour. Suppliers shall not use, engage in or support forced or compulsory labour including bonded, slavery and human trafficking practices. Their labour force, including but not limited to employees and contract labour, must meet the minimum age required by law.

Suppliers must provide appropriate wages, benefits and working hours to all employees, according to applicable laws. Suppliers must respect the right of their employees to freedom of association and have an employee grievance process.

Suppliers shall provide fair treatment to employees and create a work environment free from mental or physical coercion. Suppliers shall not discriminate based on nationality, race, religion, gender, age, sexual orientation, disability, political opinion or any other form of discrimination prohibited by law.

Environment

Bartek Ingredients Inc. expects its suppliers to act in accordance with environmental laws and regulations. Suppliers must maintain a commitment to continuously reduce their carbon footprint by operating in a socially responsible and accountable manner.

Health and Safety

Bartek Ingredients Inc. expects its suppliers to have health and safety policies in place and enforced and to follow all applicable laws and regulations related to occupational safety. Suppliers will provide safe and healthy working conditions for all employees and has in place programs to prevent and control exposure to workplace hazards. Suppliers will provide occupational health and safety training to all relevant employees. Suppliers shall not discipline any employee for raising safety concerns and acknowledges the employees right to refuse unsafe working conditions, without fear of reprisal, until management adequately addresses their concerns.

Business Ethics

Bartek Ingredients Inc. expects suppliers to comply with all local laws and regulations and refrain from any form of corruption. Suppliers will commit to conduct all business with integrity and ensure that all business transactions with Bartek Ingredients Inc. are accurately and completely recorded, guaranteeing fiscal and legal compliance.

Due Diligence Processes

Currently, the Supplier Self-Evaluation Form is the mechanism we use to conduct due diligence for any possibility that a supplier may be engaging in forced or child labour. While the questionnaire doesn't directly ask these questions, it does ask proxy questions, such as whether it has any quality or food safety certifications, and specifically ISO 9001. ISO 9001:2015 stipulates in article 4.2 that the organization must understand the needs of interested parties with respect to providing products and services that meet customer and applicable statutory and regulatory requirements. Moreover, the organization should monitor and review the information about these parties and their relevant requirements. This would include the Fighting Against Forced Labour and Child Labour in Supply Chains Act and those parties impacted by it.

For the next reporting cycle in 2024, we will include an enhanced Supplier Code of Conduct and request that our suppliers acknowledge and abide by this enhanced Supplier Code of Conduct.

Determining and preventing risk of forced labour and child labour

Bartek Ingredients Inc. partners with reputable companies that align with our Supplier Code of Conduct. These companies operate in countries that have a strong legal infrastructure as per the Human Freedom Index conducted by the Fraser Institute. Our suppliers operate in Canada, the

United States, the United Kingdom, Italy, and the Netherlands. Each of these countries has a “Rule of Law” rating of 6.5/10 or higher. These countries are ranked in the top 40 for “Human Freedom”.

Reference: <https://www.fraserinstitute.org/studies/human-freedom-index-2023>

We believe that the risk of forced labour and/or Child Labour within our Supply Chain is low because Bartek does not purchase any of the items that are known to be at risk of forced and/or child labour as per the U.S. Department of Labor website.

Reference: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

Remediation:

As part of our SEDEX certification and membership; we have taken many steps over the previous financial years. This includes the following posted on our website.

- The Supplier Code of Conduct
- Social responsibility and accountability in manufacturing Policy
- Webform for direct confidential reporting portal
- Company Code of Conduct reporting available at codeofconduct@bartek.ca

Bartek encourages its employees and external stakeholders, including employees of third-party manufacturing contractors, to report any real or suspected misconduct, including any human rights violations. Information regarding reporting is made readily available to all employees and external stakeholders at <https://www.bartek.ca/social-responsibility/> and submissions are completely confidential. All submissions are fully investigated, and appropriate remedial actions are taken when necessary.

To date, Bartek has not received any reported complaints or become aware of any incidents of forced labour and child labour in our operations or supply chain, and as a result, has not taken steps to remediate any forced labour or child labour, or remediate the loss of income to vulnerable families that result from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Training

At Bartek, we are engaged in training to promote human rights, health, safety and environmentally responsible activities and programs, as well as other professional development opportunities.

During our new employee orientation, we provide ethics training which includes training on our social accountability policy and the confidential reporting procedure for ethical violations. Hourly employees and their supervisors are required to renew their training annually on these topics through our Learning Management System.

For the next reporting cycle in 2024, we will add training about the Fighting Against Forced Labour and Child Labour in Supply Chains Act during the new employee orientation. More specialized training for forced and child labour will be offered to employees that work closely with our supply chain.

Measuring Effectiveness

To date, Bartek has not yet developed measures to assess our effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains. For the next reporting cycle in 2024, we will learn the best practices through subject matter experts or trainers and implement either metrics, targets, and/or benchmarks that are best suited for our context.

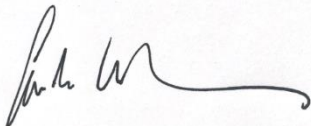
Conclusion

Bartek Ingredients Inc. remains committed to preventing slavery and human trafficking from taking place in our businesses and in our supply chains. We will continue to review our policies, procedures, and practices periodically to determine any enhancements we can make to help prevent modern slavery and human trafficking. These efforts, as well as this statement, are reviewed and approved by Bartek Ingredients Board of Directors and updated annually.

Attestation

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities subject to the Canadian Act. 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:



TorQuest Board Director
Bartek Ingredients Inc.

*This statement was approved by the TorQuest Partners Board of Directors
May 30, 2024*