



Forced Labour and Child Labour in Supply Chains

2023 Annual Report

May 21, 2024



Introduction

Bee Maid Honey Limited has determined that it is an entity within scope of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“*Bill S-211*” or “*the Act*”). This law requires entities in scope to report annually on the measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains. Bee Maid Honey Limited is responding by reviewing current practices and developing measures to work with suppliers to identify modern slavery risks to target and prioritize its actions to respond to these risks.

Background

What is forced labour and child labour?

Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, defines forced labour and child labour as follows¹:

forced labour means labour or service provided or offered to be provided by a person under circumstances that;

- (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- (b) constitute forced or compulsory labour which is defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (Article 2 of the Forced Labour Convention, 1930).

child labour means labour or services provided or offered to be provided by persons under the age of 18 years and that;

- (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.
- (b) are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to them.
- (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

The worst forms of child labour comprise:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage, and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict.

- The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties.
- Work which, by its nature or the circumstances in which it is carried out is likely to harm the health, safety, or morals of children.

Reference

1. *Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act*. (2023). Royal Assent May 11, 2023, 44th Parliament, 1st Session. Retrieved from the Parliament of Canada Website: <https://www.parl.ca/documentviewer/en/44-1/bill/S-211/royal-assent>

Identifying Information

Legal name of reporting entity:

- Bee Maid Honey Limited. Headquartered in Winnipeg, Manitoba, Canada.

Financial reporting year: 2023

The legal name of each entity covered by this report:

- Bee Maid Honey Limited
- Manitoba Cooperative Honey Producers
- Alberta Honey Producers Cooperative

The entities operate in the following sectors or industries:

- Manufacturing
- Wholesale trade
- Retail trade

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- 1. The entity has taken the following steps in the previous financial year 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 by the entity or of goods imported into Canada by the entity:**
 - Mapping activities.
 - Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.
 - Requiring suppliers to have policies and procedures in place for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.

- 2. Additional information describing the steps taken:**
 - We are not aware of any forced or child labor in our supply chain. In the event of an issue, we would consider our options for remediation, including termination of non-compliant suppliers, and act accordingly.

- 3. The following describes the entity's activities:**
 - Producing goods (including manufacturing and processing)
 - in Canada
 - Selling goods
 - in Canada
 - outside Canada
 - Distributing goods
 - in Canada
 - outside Canada
 - Controlling an entity engaged in producing, selling, or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada.

- 4. Additional information on the entity's structure, activities, and supply chains:**
 - We directly purchase from only North American companies.
 - Two vendors import their product from these locations:
 1. Turkey
 2. Poland
 3. Japan

- 5. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?**
 - Yes.

- 6. If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour?**
- Identifying and assessing adverse impacts in operations, supply chains, and business relationships.
- 7. Additional information on the entity's policies and due diligence processes in relation to forced labour and child labour:**
- When onboarding new suppliers, we require satisfactory completion of a supplier approval form. There are questions specific to forced labour, child labour, discrimination, harassment, and abuse.
- 8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**
- Yes, we have started the process of identifying risks, but there are still gaps in our assessments.
- 9. If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains?**
- Tier two suppliers (suppliers or subcontractors to direct suppliers).
- 10. The entity has identified forced labour or child labour risks in its activities and supply chains related to the following sectors and industries:**
- Manufacturing.
 - Wholesale trade.
- 11. Additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk:**
- When onboarding new suppliers, we have them complete a supplier approval form. Suppliers are required to answer the following question:
 - "Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment, and abuse?"
 - Supplier approval form addresses this for Poland and Turkey. We did not have this completed for Japan.
- 12. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**
- Not applicable, as we have not identified any forced labour or child labour in our activities and supply chains.

13. Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?

- Not applicable, as we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

14. Does the entity currently provide training to employees on forced labour and/or child labour?

- Not at this time.

15. Please provide additional information on the training the entity provides to employees on forced labour and child labour.

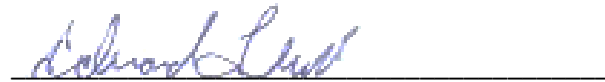
- Effective 2024, additional specific training will be made available to employees. The training topics will be focused on issues and concerns surrounding the supply chain, including human trafficking and slavery with a focus on mitigating risks.

16. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

- Not at this time.

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.



Ted Turnbull
Chairman of the Board
Bee Maid Honey Limited

May 24, 2024

Date

**I have the authority to bind Bee Maid Honey Limited*