

Forced Labour in Canadian Supply Chains

Identifying information

Questions marked with an asterisk (*) are mandatory.

Answer 1. *This report is for which of the following? (Required)

Entity

Government institution

2. *Legal name of reporting entity or government institution (Required)

Browne Group Inc.

3. *Financial reporting year (Required)

2023

4. *Is this a revised version of a report already submitted this reporting year?

Yes

No

4.1 *If yes, identify the date the original report was submitted. (Required)

NA

4.2 *Describe the changes made to the original report, including by listing the questions or sections that were revised (1,500 character limit). (Required)

NA

5. For entities only: Business number(s) (if applicable):

817369580RC0001

6. For entities only: *Is this a joint report? (Required)

Yes

No

6.1 *If yes, identify the legal name of each entity covered by this report. (Required)

6.2 Identify the business number(s) of each entity covered by this report (if applicable).

7. For entities only: *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)

Yes

No

7.1 *If yes, indicate the applicable law(s). Select all that apply. (Required)

The United Kingdom's *Modern Slavery Act 2015*

Australia's *Modern Slavery Act 2018*

California's *Transparency in Supply Chains Act*

Other, please specify:

8. For entities only: *Which of the following categorizations applies to the entity? Select all that apply. (Required)

Listed on a stock exchange in Canada

Canadian business presence (select all that apply):

Has a place of business in Canada

Does business in Canada

Has assets in Canada

Meets size-related thresholds (select all that apply):

X Has at least \$20 million in assets for at least one of its two most recent financial years

X Has generated at least \$40 million in revenue for at least one of its two most recent financial years

Employs an average of at least 250 employees for at least one of its two most recent financial years

9. For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

x Wholesale trade

X Retail trade

x Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

Professional, scientific and technical services

x Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

Health care and social assistance

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

Other, please specify:

10. For entities only: *In which country is the entity headquartered or principally located? (Required)

Canada

10.1 If in Canada: *In which province or territory is the entity headquartered or principally located? (Required)

Ontario

NA **11. For government institutions only: *Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation? (Required)**

Yes

No

NA **11.1 *If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply. (Required)**

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade
 Transportation and warehousing
 Information and cultural industries
 Finance and insurance
 Real estate and rental and leasing
 Professional, scientific and technical services
 Management of companies and enterprises
 Administrative and support, waste management and remediation services
 Educational services
 Health care and social assistance
 Arts, entertainment and recreation
 Accommodation and food services
 Other services (except public administration)
 Public administration
 Other, please specify:

11.2 *If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located? (Required)

NA

Annual Report

Reporting for entities

1. *What steps has the entity taken 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? Select all that apply. (Required)

Mapping activities

Mapping supply chains

Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

X Developing and implementing an action plan for addressing forced labour and/or child labour

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily

Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour

X Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

X Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply

Developing and implementing child protection policies and processes

Developing and implementing anti-forced labour and/or -child labour contractual clauses

- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- X Monitoring suppliers
- X Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period
- Other, please specify:
- 2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).**

- 3. *Which of the following accurately describes the entity's structure? (Required)**
- x Corporation
- Trust
- Partnership
- Other unincorporated organization
- 4. *Which of the following accurately describes the entity's activities? Select all that apply. (Required)**
- Producing goods (including manufacturing, extracting, growing and processing)
 - in Canada
 - outside Canada
- x Selling goods
- x in Canada

- X outside Canada
 - X Distributing goods
 - X in Canada
 - X outside Canada
 - X Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada
- 5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).**

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- Yes
- X No

6.1 *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? Select all that

Embedding responsible business conduct into policies and management systems

Identifying and assessing adverse impacts in operations, supply chains and business relationships

Ceasing, preventing or mitigating adverse impacts

Tracking implementation and results

Communicating how impacts are addressed

Providing for or cooperating in remediation when appropriate

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

X Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

No, we have not started the process of identifying risks.

8.1 *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? Select all that apply.

The sector or industry it operates in

The types of products it produces, purchases or distributes

The locations of its activities, operations or factories

The types of products it sources

The raw materials or commodities used in its supply chains

Tier one (direct) suppliers

Tier two suppliers

Tier three suppliers

Suppliers further down the supply chain than tier three

The use of outsourced, contracted or subcontracted labour

The use of migrant labour

The use of forced labour

The use of child labour

X None of the above

Other, please specify

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade

Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

Professional, scientific and technical services

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

Health care and social assistance

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

X None of the above

Other, please specify

10. Please provide 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

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

X

11.1 *If yes, which remediation measures has the entity taken? Select all that apply. (Required)

Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support

Compensation for victims of forced labour or child labour and/or their families

Actions to prevent forced labour or child labour and associated harms from reoccurring

Grievance mechanisms

Formal apologies

Other, please specify.

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

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

Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

Not applicable, 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

X

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

Yes

X

No

15.1 *If yes, is the training mandatory? (Required)

Yes, the training is mandatory for all employees.

Yes, the training is mandatory for employees making contracting or purchasing decisions.

Yes, the training is mandatory for some employees.

No, the training is voluntary.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

17. *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

Yes

X

No

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour

Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of Partnering with an external organization to conduct an independent review or audit of the organization's actions

Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

Other, please specify.


18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

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.”

Full name: Michael Farrell

Title: Vice President of Operations

Date: May 27, 2024

I, Michael Farrell  have the authority to bind Browne Group Inc.