

Fighting Against Forced Labour and Child Labour in Supply Chains Report

Modern Slavery Statement for the Financial Year ended August 31, 2023

This report is made pursuant to Bill S-211, an Act to enact the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This report outlines the approach and initiatives by **Clearbrook Grain & Milling Company Limited**, a subsidiary company of Jake Friesen Inc., to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing September 1, 2022, and ending August 31, 2023.

Our Business

One of British Columbia's longest-standing feed companies, Clearbrook Grain and Milling began in 1953 as a small independent supplier to local farms. Since that time, the company has grown to become a premium feed supplier to commercial poultry farms throughout the province and is still proudly family-owned and operated. Our head office is located at 2425 Townline Road, Abbotsford, BC.

Supply Chain

Clearbrook Grain & Milling's suppliers are primarily grain and oilseed producers within North America.

Risks in Supply Chain

Clearbrook Grain & Milling is committed to respecting human rights and ensuring that forced labour and child labour are not a part of any product within our supply chain.

Most products we purchase come from North American suppliers, however potential risks to our supply chain may occur if ingredients are sourced in countries documented to be at risk.

Managing Risk and Due Diligence Processes

Clearbrook Grain & Milling is committed to being socially and ethically responsible, choosing to work with suppliers who share our commitment and values. Our commitment and values are outlined in our *Supplier Code of Conduct* and detail our expectations regarding compliance with laws, ethical standards, human rights, and safety.

Before being approved as a preferred supplier, suppliers are vetted through an approval process designed to assess risk and commitment to quality with consideration to Environmental, Social and Governance criteria.

In order to mitigate identified risks, the following steps have been taken or are in progress:

- We have conducted an internal assessment to identify areas within our supply chain that may have a risk of forced or child labour.

- Developed a statement of commitment and policy regarding fighting against forced or child labour in supply chains.
- Created awareness and are developing training tools to educate team members with responsibility to procurement and regulatory concerns.
- Developed a supplier code of conduct.
- Revised our supplier questionnaire to include a section to find out more about social governance policies that new suppliers under consideration have in place.
- Contacting our current suppliers to advise them of our policy and what our expectations for suppliers will be going forward.
- We have identified the country of origin for all our products and then used resources such as the US Department of Labor's List of Goods Produced by Child Labour or Forced Labour and Walk Free's Global Slavery Index to determine whether we need to request more information from our suppliers to investigate the risk further.

Remediation

As Clearbrook Grain & Milling has not identified any forced labour or child labour in our business or supply chain, no remediation measures have been taken to date. Where a supplier is found to be in violation of our code of conduct, we will promptly assess the severity of the violation based on scale and scope, to determine our response and action on a case-by-case basis.

Training

Clearbrook Grain & Milling has an *Illegal Labour Policy* that educates all employees on the purpose of Canada's modern slavery legislation. We also provide code of conduct training as part of every new employee's onboarding program. While the code of conduct does not directly address issues of modern slavery, it affirms our commitment to ensuring everyone working on behalf of Clearbrook Grain & Milling adheres to the highest ethical standards.

Our Procurement, Regulatory and Human Resources teams are educated on the harm that illegal labour practices can cause, and what industries and countries are considered high risk. Our teams receive guidance on how to determine if illegal labour is being used at any point in our supply chain, and how to report it.

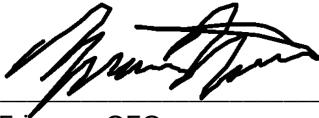
Effectiveness Assessment

Clearbrook Grain & Milling is committed to addressing the risks of forced labour and child labour in our business and supply chains. As described in this report, we have introduced a number of measures to prevent and reduce these risks. We will monitor our effectiveness through feedback from our employees, our suppliers, and by documenting any and all audits and violations.

Sign off

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending August 31, 2023. It has been issued on behalf of Clearbrook Grain & Milling CO. LTD. and Jake Friesen Inc. and approved by Marvin Friesen, Chief Executive Officer.

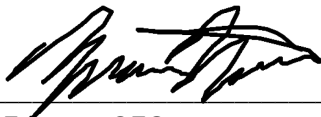
Signed,



Marvin Friesen, CEO
Clearbrook Grain & Milling Company Limited

24.5.24

Date



Marvin Friesen, CEO
Jake Friesen Inc.

24.5.24

Date