



**Forced Labour and Child Labour
Statement
2023**

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Modern slavery, in particular human trafficking, is an international problem and takes a number of forms, including exploitation, forced labor and domestic servitude.

At Colonial Farms Ltd. (Colonial Farms) we acknowledge we have a responsibility in playing a role in eradicating modern slavery. Colonial Farms believes in the fair treatment and remuneration of employees. We comply with all applicable employment legislation and industrial instruments and no employee is paid less than the minimum wage. Colonial Farms also invests in the safety, health and wellbeing of its staff.

Colonial Farms has in place a negotiated collective bargaining agreements (CBAs) with UFCW Local 1518 for many of its employees and those not encompassed in these CBAs are equally compensated based at minimum in line with our CBAs.

This CBA sets out Colonial Farms' expectations of how its management team should relate to one another including how we employ people and abide by current employment laws.

Colonial Farms seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Colonial Farms expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

This Modern Slavery Statement relates to our actions and activities for the Colonial Farms financial year from 1 January to the 31 December 2023 and complies with the mandatory reporting requirements for modern slavery statements in line with the Modern Slavery Act.



Allan King
General Manager

Mandatory Reporting Criteria

Requirement

1. Identification of the reporting entity
2. Colonial Farms' reporting structure, operations and supply chains
3. Description of modern slavery risks in Colonial Farms' operations and supply chains
4. Description of actions taken by Colonial Farms, Governance and Due Diligence
5. Effectiveness of these actions
6. Consultation process
7. Other relevant information

1. Identification of the reporting entity

This statement relates to the responsibilities of Colonial Farms. It ensures that the company follows similar policies and procedures to undertake effective steps to identify and remove contemporary slavery.

2. Colonial Farms' reporting structure, operations and supply chains

Structure

Colonial Farms is a privately owned, leading food manufacturer and supplier of fresh and frozen poultry locally, and across Canada.

With approximately 88 full time employees, Colonial Farms produces fresh poultry for British Columbia and is strongly committed to delivering safe products of a consistently high quality together with exemplary customer service to a broad range of customers including major retailers, local restaurants, food service distributors and wholesalers.

Operations and supply chains

Colonial Farms sources its goods and services from suppliers which predominately consists of live poultry, packaging, ingredients, consumables and uniforms. Some of the services we access are for cleaning, freight, waste management and network and communications to name a few. The majority of our suppliers are based within Canada, however there is a small minority of goods that are sourced from overseas.

At Colonial Farms, we source all of our raw materials from reputable, licensed producers to ensure our products are of the highest quality and standard.

Predominately our operation consists of:

Primary Processing and Distribution:

Colonial Farms has one poultry processing plant located in Armstrong British Columbia, and produces poultry products which are mainly distributed through major supermarkets, independent supermarkets, local restaurants, and food service wholesale distributors. There are approximately 88 people employed at the site.

3. Description of modern slavery risks in Colonial Farms' operations and supply chains

Operations

At Colonial Farms we consider that we are a low risk of modern slavery practices as we have no operations outside of Canada.

The vast majority of employees employed by Colonial Farms are employed directly. Colonial Farms employees are covered by negotiated collective bargaining agreements with UFCW local 1518. These negotiated agreements cover key areas including wages, hours of work, overtime conditions, additional remuneration, and leave entitlements. Where the relevant employees are not covered by a collective agreement, they are typically employed under the terms of a modern award, on above award wages. For more senior positions, they are engaged under the terms of a common law contract, which is well above the minimum conditions. All BC employees remain subject to the minimum conditions in the BC Employment Standards Act, which is regularly reviewed. These conditions are supported by a range of policies and procedures providing additional benefits. Colonial Farms' employment practices comply with all federal and provincial laws within Canada.

Our recruitment processes are strongly supported by Colonial Farms' policies and procedures. Employment decisions are made on the principle of merit, with no instances of forced labour. All employees are required to demonstrate their legal right to work in Canada. For those employees who hold authorized work permits, Colonial Farms regularly checks to ensure that an employee's work permit is still valid and any other limitations that may be placed on their work permit.

Supply Chains

Colonial Farms sources its products and services predominately from within Canada with minimal products coming from overseas.

Colonial Farms maintains a high ethical standard across its operations. It's our policy to ensure that the ethical standards that apply within our own business are also adhered to in our supply chain. The identification of risk within our supply chain is a key initial step in understanding what's required and prioritising actions.

While Colonial Farms predominately sources goods and services from within Canada, there are most likely inherent risks further down the supply chain. There may be situations where service or product

supplied to Colonial Farms by an organisation doesn't breach any modern slavery requirements, however if the organisation sourcing the products is getting them from overseas, this could be identified as a potential risk. An example could be the purchase of electronic equipment. Colonial Farms may be purchasing from a reputable supplier within Canada, however the item or components may be manufactured and produced overseas where modern slavery practices may be breached.

At Colonial Farms we operate a Supplier Approval Program which incorporates **Food Fraud Vulnerability Self Assessment** and **Food Defense & Food Fraud Plan**. While these tools are predominately food protection focused and used to mitigate food fraud/tampering, the current questionnaire has been reviewed and updated for 2024 to ensure all suppliers and service providers are providing feedback relating to social workplace accountability which does talk about their employees being legally able to work in Canada, paid the minimum wage, employees are appropriately trained, contracts comply with Canadian laws, etc.

4. Description of actions taken by Colonial Farms, Governance and Due Diligence

RISK	ISSUE	ACTION
Corporate Clothing and other goods	Possible risks may be: <ul style="list-style-type: none"> forced labour is used to manufacture below minimum wages paid Unsafe work conditions 	<ul style="list-style-type: none"> Corporate suppliers will receive a letter from Colonial Farms which will outline third party requirements with regard to modern slavery.

Operations

Colonial Farms seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Colonial Farms expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

Colonial Farms has certain policies in place to assist in ensuring that modern slavery is not taking place in its business or operations. An example of such policies is:

- **Recruitment Policy and Procedures:** all recruitment and selection procedures and decisions will reflect Colonial Farms' commitment to providing equal opportunity by assessing all potential candidates according to their skills, knowledge, qualifications and capabilities. No regard will be given to factors such as age, gender, marital status, race, religion, physical impairment or political opinions.
- **Health & Safety Policy and Procedures:** all employees undergo orientation training to ensure they understand all hazards and risks that they may encounter during employment. We perform yearly refreshers of safety training, as well as monthly toolboxes, and special toolbox presentations to continue to ensure all employees' health, safety and welfare.

- **Harassment and Violence Policy:** Colonial Farms is an equal opportunity employer and is committed to providing a harassment, bullying, and victimisation free workplace where all people are treated with dignity, courtesy, respect, and fairly on the basis of individual merit.

Other steps Colonial Farms takes to prevent and protect against modern slavery include negotiating Collective Bargaining Agreements with UFCW local 1518 and providing all employees with the right to bargain their employment terms and conditions.

5. Effectiveness of these actions

Our policies define the standards of behaviour expected of all associated with Colonial Farms, including suppliers. These policies set out Colonial Farms' expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

6. Consultation process

Colonial Farms has involved its key management teams – Operations, Quality Control and Human Resources, in order to prepare and complete this Statement.

7. Other Relevant Information

While Colonial Farms is confident that as a result of all of the external audits conducted at Colonial Farms' facility we meet the modern slavery requirements for our immediate business operations, there is still some work that needs to be done across all of our suppliers in the supply chain area. This includes:

- Continued improvement of our orientation processes to ensure all employees are trained and aware of Colonial Farms' commitment to ensure social welfare and accountability.
- Continued improvement of our Supplier Approval Program to define the standards of behaviour expected of all Colonial Farms suppliers.

By focusing on the above, this will ensure that we as a business are reasonably confident that the suppliers, we source our goods and services from, are meeting the modern slavery requirements.