



COMEAU'S SEA FOODS LIMITED
LES PRODUITS DE LA MER COMEAU LIMITÉE

P.O. Box 39, Saulnierville, Nova Scotia B0W 2Z0 Canada 902.769.2101 FAX 902.769.3594

“Fighting Against Forced Labour and Child Labour in Supply Chains Act”

Annual Report-2023

Comeau's Sea Foods Limited.

This report has been prepared for the financial year ending December 31, 2023, pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). This report describes the steps that Comeau's Sea Foods Limited has taken to prevent and reduce the risk of forced labour and child labour in Comeau's Sea Foods Limited's supply chain.

The Board of Directors of Comeau's Sea Foods Limited approved this report as attested below on May 30, 2024.

Our Business
Structure and Activities

Comeau's Sea Foods Group of Companies was founded in 1946 by Bernardin J. Comeau and Clarence Comeau and continues to be a family owned and operated business, based in Southwest Nova Scotia, Canada. Comeau's Sea Foods Limited is a harvester, processor and global distributor of fish and seafood products. We also import goods into Canada for further processing and/or distribution or for use in our facilities. Our commitment to being the best in harvesting and processing seafood also led us to expand into services that complement our industry. These services include industrial-grade metal fabrication and machining, ship repair, maintenance services, and our accredited quality control laboratory, Nova West Laboratory.

Comeau's Sea Foods Group of Companies' vision statement is “**People** working safely, **Production** of high-quality products and services, and earning **Profits** while being community minded.”

Supply Chains

Comeau's Sea Foods Limited relies on multiple suppliers around the world to provide us with a vast range of products and/or services to conduct our day-to-day operations. These range from packaging materials to raw materials (seafood products) used in production, supplies (i.e. machinery, parts, etc.) and the services of various contractors. At Comeau's Sea Foods Limited, we have an established supplier approval program, that requires each of our suppliers to complete a questionnaire package that gets reviewed and approved by our Quality Control Manager on an annual basis. This allows us to trace where our products and/or services are coming from. In an effort to incorporate requirements set out in the Act, this package will be updated to include a document that will be completed by our supplier partners to confirm that their products and/or services have not been rendered using child labour or forced labour by any means, as described within the Act. Comeau's Sea Foods Limited adheres to applicable provincial and federal labour laws, pertaining to employment and employment standards. Our Mission Statement indicates that Comeau's is “committed to providing its People with a safe workplace, good employment

opportunities, respect, [and] an important role on a successful team.” We expect our supplier partners to align with our core values and legal obligations, as it pertains to workplace safety and employment practices.

Forced Labour and Child Labour: Policies and Due Diligence Processes

Our management and procurement teams met to review and discuss the Act and to review current internal processes to look for areas of improvement in the supplier Approval process to reduce the risk of child labour and/or forced labour being utilized in any facilities providing products or services to Comeau's Sea Foods Limited, both internally and externally. Our human resources team was consulted to discuss current on-boarding processes to look for any potential areas of improvement in current hiring procedures, documentation, and/or employee training.

In early 2024, current originating seafood supplier facilities were cross referenced against a third-party list of facilities that had active accusations of forced labour being used within their facilities. No ties to any of those facilities listed were found.

Areas of Risk and Associated Steps for Assessment and Management

Hiring at Comeau's Sea Foods Limited is carried out by our own human resources and management personnel. Applicants apply for posted positions and in person interviews are conducted. All persons hired at Comeau's Sea Foods Limited are for positions located within our facilities/offices located in Nova Scotia, Canada. All successful candidates are given a written offer of employment that outlines the terms and conditions of their employment with the company, including hours, pay rate, etc., and is signed by the employee, if accepted. Pay wages meet or exceed the minimum requirement in Nova Scotia. Considering federal and provincial labour law, the potential for forced labour or child labour occurring in our own facilities/offices would be low risk. Employees are safeguarded against these scenarios with labour laws that offer protection against such situations. However, as a further step to eliminate the possibility of forced/child labour occurring, our human resources and management teams will work toward amending current documentation to incorporate applicable statements pertaining to: employees' labour being offered voluntarily without force, that employees are also free to terminate their own employment with reasonable notice without any risk inflicted by the company, student terms of employment, etc. These amendments will provide additional documentation and touchpoints to ensure accordance with the Act.

The area of highest risk for Comeau's Sea Foods Limited will be with our international supplier partners, whose production facilities are not in Canada, and thus are not required to follow the same Canadian Labour standards. The location of such facilities mean that they are not readily accessible for site visitation and in some instances, we are ordering through a third party, without direct access to the originating supplier. However, many of our suppliers are longstanding partners of Comeau's Sea Foods Limited, and there is an established relationship of trust. In addition, many of these suppliers are also Canadian or US based with business connections to the originating, overseas supplier(s), and are therefore also familiar with Canadian and US Law, as it pertains to issues, such as forced and child labour. As aforementioned, a supplier approval process is already in place at Comeau's Sea Foods Limited that provides documentation and tracing to the Originating supplier, and we are committed to an amendment to this process to receive written confirmation from these suppliers, that neither forced or child labour has been used in the production of any products or services provided to Comeau's Sea Foods Limited to further reduce our risk profile.

Remediation Measures

To date, Comeau's Sea Foods Limited has not become aware of any forced labour or child labour in its activities and supply chains. As a result, Comeau's Sea Foods Limited has not taken any

remedial measures, and therefore also has not taken any remedial measures with respect to loss of income as a result of efforts to reduced forced labour and child labour.

Training Provided to Employees on Forced Labour and Child Labour

Comeau's Sea Foods Limited recognizes the importance of increasing awareness about the risk of forced labour and child labour in our supply chain among our employees. Going forward, our management team, together with our human resources, procurement, and quality control teams will work to develop and implement training for our employees that are involved in the onboarding and management of supplier relationships.

Assessment of Method Effectiveness

Comeau's Sea Foods Limited has planned amendments to current processes to increase the effectiveness of making sure that neither forced labour or child labour are being used in our business or supply chain. Education and awareness has been an initial step, and our management, human resources, procurement, and quality control teams will continue to work towards the implementation of additional measures to reduce the risk of forced labour and child labour in our supply chains. We will use the annual supplier questionnaires as the basis for monitoring year-to-year compliance, and as our compliance program is further developed, we will continue to look for ways to monitor the effectiveness of the measures we have in place.

Attestation


This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Comeau's Sea Foods Limited.

In accordance with the requirements of the Act, and in particular section 11 thereof I, the undersigned, attest that I have reviewed the information contained in the report for the entity specified below. 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 specified above.

I make the above attestation in my capacity as a director of Comeau's Sea Foods Limited for and on behalf of the Board of Directors of Comeau's Sea Foods Limited.

I have the authority to bind Comeau's Sea Foods Limited.

COMEAU'S SEA FOODS LIMITED

Per: 
Name: Noël Despres
Title: Director & President / CEO
Date: May 30, 2024