



**Picton (head office)**  
38 Cold Storage Rd.  
Picton, ON K0K2T0  
Ph: 613-476-2171  
Fax: 613-476-1226

**Belleville**  
222 Hamilton Rd.,  
Belleville, ON K8N4Z5  
Ph: 613-962-0769  
Fax: 613-962-6470

### BILL S-211

Bill S-21 is an act that is part of the Fighting Against Forced Labour and Child Labour in Supply Chains Act which together form the Canada Modern Slavery Act. This bill was also designed to amend the Customs Tariff.

### Modern Slavery Statement for the Financial Year ended January 2024.

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 and to amend the Customs Tariff. This statement outlines the approach and initiatives by County Farm Centre to identify and address the risks forced labour and child labour in its business operations and supply chains during the fiscal year commencing February 2023 and ending January 2024. This is the initial filing for County Farm Centre Ltd.

County Farm Centre Ltd. is committed to respecting human rights and working towards ensuring our supply chain is free from forced labour and child labour.

### Company Structure

County Farm Centre Limited was established in January 1994. It does business under the business name of County Farm Centre Limited with its head office in Picton, Ontario.

The company is owned 50% by Growmark Inc and 50% by TLKRB Holdings Inc. It operates with a board of directors, with two representatives from both ownership companies. Growmark Inc is a US-based company, incorporated in the state of Delaware, with headquarters in Bloomington, Illinois, USA. The Canadian headquarters are in Guelph and Chatham, Ontario. TLKRB Holdings Inc. is an Ontario company with headquarters in Bloomfield, Ontario.

County Farm Centre Ltd. operations encompasses the sale of crop inputs, custom crop applications, livestock feed, fuel and propane and retail store. These four divisions, Agronomy, Grain and Feed, Energy/Propane and Retail have become the foundation of County Farm Centre Ltd.

Each division has its own manager overseen by the General Manager who is a member of the board of directors.

### Supply Chain

Our supply chain encompasses many products across the company. Agronomy products, energy and propane are sourced through a main supplier, GROWMARK. Our feed division purchases products through several national suppliers, Masterfeeds, Parish & Heimbecker, Jefo Nutrition Inc. Many of our retail products are purchased through a main supplier in Canada, Peavey Industries LP.



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Agronomy, Grain and Feed, Energy, and Retail products are sourced through companies that specialize in the products needed by our customers.

### Risks in Supply Chain

Our company is committed to respecting human rights and will work towards ensuring that forced labour and child labour is not a part of any product within our supply chain.

### Actions Taken

Our company has been, and continues to be, committed to due diligence policies and process through our company mission statement and complying with all Forced Labour and Supply Chain Acts in Canada. County Farm Centre Limited company policies and procedures apply to the company's business and include the expectation that those acting on its behalf will comply with the law, which includes forced and child labour laws.

As this is our initial reporting on our supply chain in response to Bill S-211 requirements, we do not have information available for this reporting period. However, our company is committed to developing and conducting an internal assessment of risks of forced labour and/or child labour in our organization's activities and supply chains. Our interest in this assessment is for identifying, addressing, and prohibiting the use of forced labour and/or child labour in our company's activities and supply chains.

Our organization is committed to developing policy and procedures that enable us to monitor our suppliers, enact measures requiring our suppliers to have in place policy and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and their supply chains. We will distribute this report annually to all company management, employees and on our public website.

### Risk Assessment

Our company has begun the process of communicating with our suppliers to confirm that they do not distribute goods and services that support or condone child labour or forced labour in Canadian or International supply chains. This process will include developing a questionnaire for all suppliers to attest to their compliance with these expectations.

Our company is communicating with partners in the industry to work together to develop steps going forward to identify risks with our supply chain.



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Our company is developing policy and procedure for our management and employees to learn about, identify and follow company policy on the use of forced labour and/or child labour in our supply chains.

### Remediation

County Farm Centre Ltd. recognizes the responsibility that we share with our suppliers to provide remedy and guard against forced and child labour. Successful remediation is not easy to achieve and requires a victim-led, consultative and multi-stakeholder approach.

1. Definition of a complaint- a complaint as a report of violation that has occurred in our supply chain and internal business and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.
2. Designing a remediation procedure. County Farm Centre recognizes that it is important to identify and establish a remediation team to develop the business's remediation procedure. This should be made up of representatives from the workforce, managers, and organizations with expertise in forced and child labour where available. If there is an existing government or organization, process or project providing remedy for victims of modern slavery, these should be identified and involved in the development of the remediation procedure. Protecting the victims of forced and child labour must be the priority of the remediation program. The remediation team must seek to understand the specific needs, circumstances and aspirations of each victim and what it was that pushed them forced or child labour.
3. Dealing with a case of forced labour and/or child labour. Conduct an initial assessment of the allegations to ensure that there is sufficient information to understand the exploitation discovered and remedy it. Ascertain if a supplier or labour provider is implicated. Report the allegations to relevant authorities.
4. Ongoing support and monitoring. Evaluating how effective the remediation procedure was and amending it accordingly. Reviewing internal policies and procedures to determine what needs to change to prevent forced and child labour from re-occurring.

### Training

County Farm Centre has ongoing mandatory compliance for all employees to support our mission statement/code of conduct. We are also developing a training policy including awareness of forced labour and/or child labour, identifying the risks within our supply chain, and remediation policy and procedure.



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This training policy would include review of policy on an annual basis and may include on-going compliance seminars and awareness campaigns.

#### Effectiveness Assessment

Once we have had our training and policy developed, we would include number of employees trained each year. We would develop awareness campaigns and seminars that employees attended.

Record how many suppliers we have communicated with to confirm supply chain policy and record questionnaires and investigation/audits of any suppliers.

#### Sign off.

This report has been presented to our company's board of directors and approved.

This statement is made pursuant to Bill S-211, An Act that is part of the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the fiscal year ending 01/31/2024. It has been issued on behalf of County Farm Centre Limited and approved by County Farm Centre Limited Board of directors.

Signed,

**Timothy Beatty**  
**General Manager and Director**  
**County Farm Centre Limited.**

May 27, 2024

Date