

**Canadian Statement Against Forced Labour and Child Labour in Supply Chains**  
pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in  
Supply Chains Act and to amend the Customs Tariff,  
referred to as Canada’s “*Modern Slavery Act*” (the “**Act**”)  
for the year ending September 30, 2023

**1. INTRODUCTION**

This is a statement made by Crofters Food Ltd. (“**Crofters**”) in respect of the Act, as referenced above on behalf of the reporting entities listed in section 2 below.

**2. REPORTING ENTITY**

This statement is being filed with respect to the activities of Crofters. Crofters is a corporation incorporated pursuant to the laws of British Columbia.

**3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

Crofters is a producer of organic fruit spreads, preserves, jams, and jellies. All Crofters products are produced in a facility in Ontario, Canada. All goods are primarily sold and distributed in Canada and the United States (USA), with some international sales. Crofters is headquartered in Ontario, Canada.

Crofters has suppliers in various countries, primarily for fruit and sweetener ingredients, and packaging. Crofters procures raw materials primarily from Canada, the USA, Mexico, Chile, China, Turkey, Serbia, Poland, Germany, Taiwan, Spain, Peru, Brazil, France, and Ukraine. Agricultural products such as fruits and sugar are sourced from farms in Asia, Europe, South America and North America.

**4. POLICIES AND DUE DILIGENCE PROCESS IN RELATION TO FORCED LABOUR AND CHILD LABOUR**

Crofters has several policies and screening measures in place for its suppliers. The approval process prior to purchasing goods from new suppliers is strict, and existing suppliers are required to complete supplier approval documents annually. In-person supplier visits are conducted where possible, especially for new suppliers.

**Recruitment**

Crofters operates a robust recruitment policy, which includes conducting eligibility background checks for all employees to safeguard against human trafficking, forced labour, and child labour.

**Health and Safety Policy & Workplace Violence and Harassment Prevention Policy**

Crofters’ Health and Safety policy ensures a healthy working environment for employees and contractors that work within the Crofters premises. Crofters strictly prohibits all forms of forced labour and child labour within our business and operations. In support of this prohibition, Crofters has adopted an employee handbook. This employee handbook includes a workplace violence and harassment prevention policy. In accordance with this policy, workers are required to comply with applicable laws and Crofters policies. Workers are protected from any form of discipline for

reporting any form of workplace violence or harassment. Employees are required to review and sign the policy as a condition of employment. Failure to abide by the policy may result in disciplinary measures, up to and including potential termination of employment.

### **Human Rights Policy**

Crofters has a Human Rights Policy that addresses human trafficking, slavery and child labour. The policy affirms Crofters' commitment to investigating any concerns regarding child labour, slavery or human trafficking by its direct suppliers, subcontractors, transportation companies, or elsewhere within the Crofters supply chain. All Crofters employees and contractors are expected to uphold the policy. Failure to adhere to the Human Rights Policy may result in disciplinary measures, up to and including termination of employment or a commercial relationship with Crofters.

### **Social Compliance Questionnaire**

The completion of Crofters' Social Compliance Questionnaire is required by all suppliers and subcontractors. This questionnaire relates to labour and health and safety standards to ensure the well-being of employees in the Crofters' supply chain. Suppliers and subcontractors are required to answer questions regarding:

- The legal age of employees working for the supplier;
- The ability of employees to terminate their employment;
- The minimum legal requirements for regular and overtime hours;
- Any policies or programs in place for overtime hours, and health and safety initiatives;
- Any personal protective equipment provided to employees;
- The adequacy of emergency exits, fire extinguishers, and first aid kits.

Crofters maintains copies of these questionnaires and can, accordingly, re-review these responses during the course of the relationship with the supplier.

### **Sedex**

Crofters is a member of [Sedex](#) – an organization that assists companies to implement practices and policies to build responsible and sustainable supply chains. Crofters has completed a four-pillar social compliance audit through Sedex, and is re-audited annually. Crofters prefers to source from suppliers that are members of Sedex and have completed social compliance audits.

## **5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK**

As Crofters procures raw materials from many different countries, there is the possibility that certain elements of the supply chain may pose a risk of forced and/or child labour. As stated above, Crofters has many screening policies and procedures in place for its suppliers, and prefers to source from suppliers that are members of Sedex.

## **6. MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR**

Crofters has longstanding relationships with its suppliers. Based on its knowledge after conducting social compliance audits through questionnaires and site visits, Crofters has not identified any instances of forced labour or child labour in its supply chains. Consequently, no remediation measures were required for the fiscal year ended September 30, 2023, in respect of any modern slavery – including forced labour or child labour – in Crofters’ supply chains.

## **7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR**

As noted above, as Crofters has not identified any instances of forced or child labour in its supply chains, it has not taken any associated measures to remediate loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced or child labour in its supply chains.

## **8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR**

All employees involved in purchasing and contracting decisions are required to participate in training on child labour and forced labour. This training is based upon the *Employment Standards Act*. Employees are encouraged to only use trusted suppliers and contractors wherever possible. Employees are trained on looking for social compliance certificates and co-op farming structures when sourcing raw materials.

## **9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS**

As noted above, Crofters is a member of Sedex, and has completed a social compliance audit through Sedex. Crofters is reaudited annually.

## **ATTESTATION**

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. For clarity, I am providing this attestation in my capacity as a director and officer of Crofters Food Ltd., and not in my personal capacity.

By: 

Name: Sebastian Latka

Title: VP of Supply Chain, Crofters Food Ltd.

*I have authority to bind Crofters Food Ltd.*

Date: May 30, 2024