

Dot Foods Canada, Inc. Forced Labour and Child Labour Report Submission due May 31, 2024

Introduction

Dot Foods Canada, Inc. (“Dot”) is Canada’s largest food redistribution company, buying truckloads of products from our manufacturer partners, storing, consolidating, and then selling them to Canadian distributors. We remove costly and challenging less than truckload shipments from the supply chain of our business partners and make products more affordable and accessible to the consumer.

Requirement (a) – Structure, activities, and supply chains

Company Overview

Structure:	Corporation
Founded:	2016, distribution centre opened in 2022
Headquarters:	100 Ken McKee Street, Ingersoll, ON N5C 3J8
Nature of business:	Imports and distributes both domestic and foreign manufactured food products
Scope:	Distributes a diverse range of 3,300 Canadian and American products for more than 275 Canadian distribution points.
Financial Year:	January 1 to December 31
Reporting Period:	Financial year 2023

Supply Chain: We currently buy finished products from over 90 suppliers located primarily in Canada and the United States. Of the products we import, ninety-five percent is imported from the United States and the rest from Europe. All suppliers are located in countries with existing anti-trafficking or forced labour laws or regulations.

Requirement (b) – Policies and due diligence processes

Company Policy and Commitments

Dot has zero tolerance for forced labour or child labour among its business partners. Dot would not knowingly purchase products from operations exploiting its workers. This requirement is communicated to our suppliers in our policies and procedures document which is sent to all new suppliers.

Dot Foods Commitment: Together with our partners and community members, we promise to work tirelessly to build better, more sustainable, and prosperous communities around each of our distribution centers and offices.

Dot has a corporate social responsibility platform that includes community investment through food and other kinds of donations and volunteerism; a robust equity, diversity and inclusion priority; processes for measuring our environmental impact (electricity, waste and recycling, as well as materiality). Dot invests in training and development for our employees as well as members of our communities.

Requirement (c) – Forced labour and child labour risks

Risk Assessment

We are aware that there are risks of forced labour throughout the global food supply chain. We are a food redistribution company providing a supply chain solution to manufacturers, distributors and retailers. We source products primarily from U.S. and Canadian-based manufacturers who operate under existing Forced Labour laws and regulations. We comply with all federal and provincial minimum working age laws and ensure this during new employee onboarding. Our suppliers and customers all operate under Occupational Safety and Health agencies which ensure safe working conditions and protect worker rights. Additionally, they all operate under Labour codes and authorities who ensure that minimum working ages are met.

As a company that also transports goods or causes them to be transported, we also are aware of and consider the risk of human trafficking in our supply chain. To address this, we train our drivers through an organization called Truckers Against Trafficking and will provide further detail below.

Supplier Due Diligence

Currently all Dot Foods Canada Inc. suppliers are located in countries with existing anti-trafficking or forced labour laws or regulations.

We require that all of our suppliers, foreign or domestic, comply with all Canadian regulations and laws, which includes the Forced Labour Act. Our supplier policies and procedures document states our expectations that the Supplier will use reasonable efforts to assure that no products are manufactured with forced, prison, or child labor, and this is communicated when a new supplier is launched.

Many Dot suppliers are now providing publicly available statements addressing Human Rights, Forced Labour, Human Trafficking and Child Labour, including how they manage their supply chain operations to those standards.

Suppliers' activities vary, such as signed supplier codes of conduct, surveys, or other audit processes.

Requirement (d) – Remediation measures

Incident Reporting and Response

We have had no incidents or reports of forced labour within our supply chain. If faced with such incidents or reports, we would take appropriate, and commercially reasonable efforts to remediate the situation. Employees violating our company policies may be subject to discipline, up to and including termination of employment.

Requirement (e) – Remediation of loss of income

We are aware that efforts to prevent and reduce the risk of forced labour can have unintended consequences to vulnerable families. However, we have had no incidents or reports of forced labour within our supply chain, so we have not faced any unintended consequences.

Requirement (f) – Training

Training and Capacity Building

We have partnered with Truckers Against Trafficking and are implementing a driver training program designed to detect and report human trafficking. Truckers Against Trafficking is a nonprofit organization that trains drivers to, in their everyday jobs, provide more eyes and ears to assist law enforcement in identifying both victims and perpetrators of human trafficking.

Collaboration and Stakeholder Engagement

Addressing forced labor requires a multi-faceted approach involving not just legal frameworks but also industry collaboration, supply chain due diligence, worker empowerment, and public awareness.

Dot Transportation Canada has partnered with Truckers Against Trafficking and are in the process of implementing a driver training program designed to detect and report human trafficking. Truckers Against Trafficking is a nonprofit organization that trains drivers to, in their everyday jobs, provide more eyes and ears to assist law enforcement identify both victims and perpetrators of human trafficking.

Dot has a relationship with the Marine Stewardship Council (for ethical and sustainable sourcing of seafood). The MSC has introduced measures to reduce the risk of forced or child labour in MSC-certified fisheries and supply chains.

Requirement (g) – Assessing effectiveness

Dot did not identify any known risks of forced labour or child labour in its supply chain. Nevertheless, Dot will direct appropriate measures in 2024, including proper assessment of its supply chain.

Conclusion

The exercise of preparing this inaugural report has been a good educative tool. The categories to be addressed and the detailed items to consider for each is a blueprint for our planning in 2024.

Dot Foods Canada takes seriously the health and welfare of all people within its broad group of suppliers. We are fully compliant with the Criminal Code of Canada which contains provisions related to human trafficking, which can include forced labour.


We are fully conversant and observant of the Canada Labour Code which sets out federal labour standards and protections for workers – many of which are aimed at prevention of forced labour and to ensure the fair treatment of workers, including:

- Provincial and Territorial legislation if there is any variation in labour standards legislation passed at the provincial and territorial levels
- Immigration and Refugee Protection Act – related to the employment of foreign workers, addresses issues of exploitation or forced labour.
- Supply Chain Transparency initiatives – designed to promote supply chain transparency and ethical sourcing practices.

ATTESTATION OF FORCED LABOUR AND CHILD LABOUR REPORT (2024)

The undersigned, being all of the Officers of **Dot Foods Canda, Inc.**, a British Columbia corporation (“Dot Canada”), hereby attest that, as of May 29, 2024, each of the undersigned has authority and is empowered by, on behalf of and in the name of Dot Canada to execute this Attestation, and to the best of our knowledge and belief, all information in the above referenced Forced Labour and Child Labour Report is accurate and complete.

IN WITNESS THEREOF, the undersigned hereby executes this Attestation on this 29th day of May 2024.

DocuSigned by:

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By: John M. Tracy, CEO

DocuSigned by:

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By: Richard L. Tracy, President

DocuSigned by:

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By: Cullen H. Andrews, Vice President