



To the Minister of Public Safety, Canada

Report to comply with requirements set forth in Bill S-211, Section 11

The following report has been prepared by Elmira Pet Products Ltd. (“EPP”) and Nutram Pet Products Inc. (“Nutram”) (collectively “the Entities”, “we”, or “our”), which are independent but related entities with shared ownership, in compliance with Section 11 of the Fighting Against Force Labour and Child Labour in Supply Chains Act (“the Act”) for the year ending April 27th, 2024.

The report aims to highlight the Entities’ commitment to uphold honesty and integrity in all its business operations, delineate the measures that have been implemented, as well as those it plans to undertake, to mitigate the risks associated with child labour and forced labour within its operations and supply chains.

For the purposes of the Act, both EPP and Nutram meet the definition of “entity” by having a business in Canada, doing business in Canada, and meeting the thresholds for revenue and assets, and the definition of “reporting entity” by virtue of importing goods into Canada and manufacturing, distributing, and / or selling goods in Canada.

The Entities prioritize integrity and ethical conduct as the foundation of our sustainable business. We are deeply committed to social responsibility, promoting human rights, fair employment, environmental stewardship, and community support. Our core values emphasize accountability, continuous innovation, and process improvement, ensuring we meet the evolving needs of our stakeholders and maintain our role as a responsible corporate citizen. These principles are integral to our identity and guide every aspect of our operations.

Subsection 11(1) Requirement

Steps taken in previous financial year to prevent and reduce risks of forced labour and child labour

The Entities have implemented several measures to prevent and reduce the risk of forced and child labour across internal operations and supply chain in recent years, with many activities continuing into the most recent financial year, including:

- **Supply Chain Mapping:** Completing a mapping of the supply chain to identify and understand all the stages of production and sourcing locations. This step has helped to pinpoint areas of potential risks for forced or child labour.
- **Risk Assessments:** Conducting internal risk assessments to evaluate the likelihood and impact of forced and child labour in our operations and those of our suppliers.
- **Strengthening Recruitment Practices:** Implementing strict controls to ensure that all worker recruitment is voluntary. This includes monitoring recruitment agencies and practices to prevent any form of coercion or deception.

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- **Supplier Standards and Compliance:** Requiring all suppliers to comply with our zero-tolerance policy for child labour and forced labour. Suppliers are being encouraged to put in place measures to identify and eliminate forced and child labour from their operations.
- **Engagement and Collaboration:** Actively engaging with supply chain partners and stakeholders to ensure a cohesive approach towards mitigating forced and child labour risks.

These steps are part of our ongoing commitment to uphold ethical labour practices and ensure that our production processes are free from forced and child labour, both domestically and internationally. Further information regarding our policies, practices, and procedures regarding forced and child labour are outlined in subsection 11(3).

Subsection 11(3) Requirements

a) Structure, activities, and supply chains

EPP is Canada's largest private label dry pet food manufacturer and leverages nearly 40 years of experience to offer unique solutions that promote growth for our global partners. It produces a comprehensive range of products, from therapeutic and holistic diets to premium, mid-range, and economically priced formulations. Serving a diverse customer base, EPP manufactures well-known brands for mass merchandisers, grocery stores, and pet specialty channels.

EPP employs over 200 employees across several departments, including formulation, manufacturing, research and development, procurement, logistics, quality and safety, and finance and administration, all coordinated under a leadership structure led by Bryan Cook, the Chief Executive Officer. EPP operates independently and does not control any subsidiary entities.

Nutram is a related entity that shares owners with EPP and focuses on the sale of pet food products under a consumer-facing retail brand. Most products are sourced from EPP, who manufactures Nutram's products under a private-label basis. Nutram distributes its products through Canadian and global pet specialty retailers and focuses on premium, Canadian-made recipes for caring pet parents.

EPP and Nutram prioritize local ingredients where possible but also rely on many suppliers outside of Canada for multiple ingredients. The Entities prioritize long-term, top-tier partners and actively assist new suppliers in integrating with our systems. We believe the best partnerships are built on shared goals, a mutual commitment to customer satisfaction, and the commitment to delivering high-quality pet food.

More than two-thirds of EPP's tier-one suppliers are based in Canada, with the remainder being trusted partners based in Denmark, France, the Netherlands, Norway, Paraguay, and

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the United States. The goods that we source include wholefoods, nutrients, compounds, probiotics, and other pet food ingredients, and approximately 41% of them are of Canadian origin. Nutram, meanwhile, procures nearly 98% of its products from EPP, and only just over 2% from a supplier based in the United States.

b) Policies and due diligence processes

Internal

[Corporate Social Responsibility | Elmira Pet Products](#)

The Entities uphold the highest ethical standards across all facets of our business operations. Our shared Code of Conduct mandates ethical decision-making for all employees and strictly prohibits forced labour, child labour, and any unethical practices.

We are committed to providing our employees with reasonable working hours, fair treatment, competitive compensation, and equal opportunities for professional development. Discrimination, harassment, and any form of unfair treatment are categorically forbidden within our organization. Furthermore, robust internal controls are in place to guarantee that all workers are recruited voluntarily, reinforcing our commitment to ethical employment practices.

To minimize the risk of forced or child labour, the Entities rigorously adhere to applicable provincial labour laws, including standards set by the provincial employment regulations regarding minimum employment age. Through these measures, we ensure our operations remain free of child and forced labour and uphold the dignity and rights of all individuals involved in our business.

Supply Chain

The Entities have taken comprehensive steps to prevent and reduce the risk of child and forced labour in its supply chains. We have developed a Supplier Code of Conduct and actively ensure that our suppliers share our commitment to maintaining a sustainable and responsible supply chain. Our global vendors are evaluated and selected through in-person visits to ensure that their manufacturing processes meet our standards and are made aware that we have a zero-tolerance policy for child and forced labour, strictly prohibiting any form of involuntary servitude.

We are currently in the process of securing affirmations from our suppliers to this zero-tolerance policy for child labour and forced labour. We have covered approximately 35% of our global suppliers across several product categories, including animal proteins, vegetable proteins, grains, vitamins/minerals, and enzymes. This initiative is scheduled to continue throughout 2024. Additionally, these affirmations will be integrated into our Standard

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Operating Procedures (SOP) for vendor and ingredient approval, ensuring that ethical sourcing and compliance remain central to our business.

Feedback is a crucial part of our continuous improvement process. The Entities have a grievance and complaint process on our website to address concerns or complaints related to child and forced labour in our supply chain. Our policies and processes are described on our website to ensure transparency and accountability.

Recognizing the paramount importance of ongoing improvement in our due diligence processes to identify, prevent, and mitigate adverse impacts on human rights within our operations and supply chain, the Entities will continue to align and enhance practices with the comprehensive framework provided by the OECD Due Diligence Guidance for Responsible Business Conduct. Our objective is to continue embedding RBC principles in our policies and management systems, ensuring a proactive stance towards assessing and addressing risks in our operations and supply chain.

c) Forced labour and child labour risks

In support of our commitment to be proactive in addressing any risks in our operations and supply chain, EPP and Nutram conducted a risk assessment of its supply chain in the preparation of this report. This process was guided by the insights provided by the Walk Free Global Slavery Index (GSI) and the US Department of Labour's (USDL) List of Goods Produced by Child Labour or Forced Labour, which provide guidance on potential modern slavery risks based on country of origin or supplier location and type of product. The assessment was aimed at recognizing "hot spots" in our supply chain where risks may be highest, enabling us to implement effective preventative measures.

The Walk Free GSI and the USDL's List of Goods Produced by Child Labour or Forced Labour were instrumental in our risk assessment process. We acknowledge that no industry is entirely exempt from the risks of forced and child labour, and EPP, as a manufacturing entity, recognizes the inherent vulnerabilities in certain links of our supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be as robust. This understanding has prompted us to delve deeper into our supply chain, extending our scrutiny to direct and indirect suppliers and the various stages of our value chain.

Risk Assessment Findings

The assessment identified that EPP faced potential heightened risks of child and forced labour associated with certain imported goods that a tier one supplier sources from India and China. Both countries are recognized as high-risk jurisdictions by the Walk Free GSI. After reviewing the USDL's List of Goods Produced by Child Labour or Forced Labour, however, EPP concluded that none of the goods procured appear to be linked to higher risks of modern slavery.

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Furthermore, these imports from India and China constitute less than 1% of EPP's total procurement volume.

EPP and Nutram's tier one suppliers do not operate in regions known for heightened risks of child and forced labour. Approximately 98% of our combined procurement budget is allocated to tier one suppliers in Canada and the United States. The remainder is spent with trusted partners from Denmark, France, the Netherlands, Norway, and Paraguay.

Overall, the findings from our risk assessment confirmed that our exposure to forced and child labour risks within our suppliers, while not insignificant, is low. Nevertheless, this is no way will diminish our efforts to continue improving our level of diligence and remain vigilant of risks as we continue to expand our global base of suppliers.

d) Remediation measures

Neither of the Entities have identified or faced any instances of forced or child labour within our operations or supply chains to date. However, if any instances of child or forced labour are ever identified in our supply chain, we are committed to working with the impacted suppliers to determine the appropriate remediation measures based on guidelines provided by the robust frameworks provided by the OECD.

To ensure that we identify any potential risks in a timely manner, EPP has established an anonymous, accessible grievance mechanism for employees of its suppliers, which enables them to report any incidents using a safe and confidential process. More broadly, we will also continue to explore additional remediation policies or practices to safeguard victims, notify the relevant authorities, and engage with external expert organizations to resolve any potential incidents that may arise.

e) Remediation of loss of income

Per the section above, the Entities have not identified or faced any child or forced labour incidents that have required the remediation of income loss for vulnerable families. We do however recognize the importance of being prepared to take immediate and effective action should any issues arise in the future, so if any of our suppliers were to face an incident of child or forced labour, we are committed to working with them to ensure that the situation is remediated appropriately and that the loss of income to the corresponding vulnerable families is also remediated, following international guidelines. Remediation measures could potentially include alternative income-generating opportunities, supporting access to education to those impacted, and / or partnerships with local NGOs to support community well-being.

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f) Training

While the Entities provide mandatory training for all employees on health and safety in the workplace, we do not currently have training in place covering ethical sourcing and the identification of forced and child labour risks.

The Entities are therefore exploring several options that relate to the training of its staff, to build awareness on the issue and educate on the policies, practices, and actions required to minimize risks of forced and child labour in the supply chain. We acknowledge that education is a critical step in our ongoing commitment to managing forced and child labour. Options currently being investigated include, but are not limited to:

- **Targeted training:** employees with roles in our procurement and supply chain team may receive targeted, mandatory training on the risks of forced and child labour in the supply chain and how to address them.
- **New employee awareness:** to raise awareness among incoming employees, references to child and forced labour may be included in our standard onboarding materials.

Our aim is to grow a team of professionals that are collectively vigilant and proactive against forced and child labour.

g) Assessing effectiveness

Since the Entities have only recently started to implement new policies and practices that incorporate the management of child and forced labour risks, we have not yet fully introduced a governance process to evaluate the effectiveness of our actions and measures. However, we do recognize the need to have a governance process in place, so we will be exploring several initiatives during our current financial year, namely the introduction of an annual review to evaluate the effectiveness of our initiatives to raise awareness of our Supplier Code of Conduct, collect affirmations from suppliers on our zero-tolerance policy, and educate our employees on the issue; as well as the introduction of specific indicators to monitor our performance throughout the year and report on progress on a regular basis.

The Entities remain committed to continuous improvement on governance, with the aim of further enhancing our level of diligence, accountability, and transparency in the management of child and forced labour risks in our activities and supply chains.

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 Entities listed above, and that it has been approved by the governing body of the Entities. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true,

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accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: Bryan Cook

Title: Chief Executive Officer

Date: May 31, 2024



Signature

I have the authority to bind Elmira Pet Products Ltd. and Nutram Pet Products Inc.

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