

Four Rivers Co-operative



Forced Labour in Canadian Supply Chains

Four Rivers Co-operative

DATE May 23, 2024



Introduction

This report is Four Rivers Co-operative's response to comply with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act) for the financial year ending December 31, 2023. In this Statement, the terms 'the Co-op', 'we', 'us', and 'our' refer to Four Rivers Co-op. The reporting entity covered by this statement is Four Rivers Co-op, business number 105486542.

For the purposes of the Act, Four Rivers Co-op meets the entity definition by having a business in Canada, doing business in Canada and meeting all three threshold criteria for revenue, assets and employees. Four Rivers Co-op is incorporated provincially and is obligated to submit a report to the Minister of Public Safety and provide a public report in response to the Supply Chains Act by May 31, 2024.

Four Rivers Co-op is committed to continuous improvement in the areas of identification and remediation of forced and child labour in operations as well as local and global supply chains. Further, Four Rivers Co-op is committed to respecting all human rights, in accordance with applicable law and the principles set forth in international standards, including the UN's Declaration of Human Rights, the UN Rights of Indigenous Peoples and UN Guiding Principles on Business and Human Rights.

Guided by core values of Responsibility, Integrity, Service and Excellence Four Rivers Co-op is committed to making ethical business decisions and taking proactive measures to address issues such as forced and child labour.

1. Structure, Activities, and Supply Chain

Structure

With our head office based in Vanderhoof, BC Four Rivers Co-operative is one of 158 independent retail co-operatives from across Western Canada that make up the Co-operative Retailing System (CRS) and own Federated Co-operatives Limited (FCL). Four Rivers Co-op is in turn owned by over 38,000 members in British Columbia. As part of the CRS, Four Rivers Co-op helps build, feed, fuel and grow individuals and our local communities. We employ over 275 individuals throughout Central British Columbia

Activities

Four Rivers Co-op business is a retail focused co-operative serving the 16 communities in which we operate throughout Central British Columbia, Our core retail lines of business include food, agriculture, home and building supplies, fuel, lubricants, propane and convenience stores.



2. Policies and Processes in Relation to Forced and Child Labour

Four Rivers Co-op is adapting its own supplier code of conduct to complement the code of conduct that Federated Co-operatives Limited has in place. This code of conduct has been reviewed and approved by the board of directors in May 2024. Our co-operative is also in the process of reviewing related existing policies to update the language of these policies so that they are also in compliance with the new legislation of Bill S-211. We will be diligently working with our suppliers to implement this new code of conduct along with:

- Supplier questionnaire used to learn more about the vendor or vet their qualifications or suitability
- Supplier clauses in contracts related to forced labour/child labour
- Supplier performance or quality monitoring and auditing
- Mechanisms in place for securing relationship with FCL (if different from other suppliers)

Internal

Four Rivers Co-op maintains Compliance and Ethics policies which all new employees are made aware of through their orientation process. We are currently reviewing the establishment of an annual Code of Conduct attestation and the compliance for this attestation. Four Rivers Co-op has an established internal process for anonymous reporting of actual or potential wrongdoing including any actual or potential violation of law, regulation, policy and procedure. Procedures are put in place to protect the anonymity of whistle-blowers from retaliation. Four Rivers' People and Culture team regularly reviews human resource related policies to ensure Four Rivers Co-op remains in compliance with applicable workplace and labour legislation.

Four Rivers Co-op ensures that there is reduced risk of forced or child labour in operations through strict adherence to provincial and federal labour laws. As per British Columbia's labour laws, Four Rivers Co-op does not employ anyone under the age of 15 and follows all applicable young worker restrictions for employees under the age of 16. Four Rivers Co-op strongly believes that all individuals, especially the youth, are entitled to have the freedom to pursue their education. This includes not allowing these youth to be employed during normal school hours and that hours worked will not interfere with their education pursuits and requirements.

Four Rivers Co-op is exploring the implementation of effective grievance and remediation mechanisms in effort to address concerns or potential cases of forced and child labour in the supply chain. Four Rivers' goal is to prioritize the reporting and remediation of forced and child labour incidents, protect victims and prevent future cases. Potential mechanisms may include:

- Development of a remediation framework with information on when to safeguard the victim, develop and implement a corrective action plan



Using two separate indices, Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, China has been identified as a high inherent risk country for forced and/or child labour. Four Rivers Co-op has recently developed a supplier code of conduct that will be issued to all of our suppliers to understand and acknowledge this new code of conduct to minimize any impending risks.

Four Rivers Co-op has implemented the following policies, procedures and management oversight controls:

1. Four Rivers Co-op has developed a supplier code of conduct that will need to be reviewed, acknowledged and signed by all existing and new suppliers.
2. Our co-operative will be diligent in following up with the areas of inherent risk. We will concentrate our initial efforts on suppliers we purchase the greatest amount of products and work our way down the list to less often used suppliers.
 - This will include supplier questionnaires used to learn more about the vendor or vet their qualifications or suitability
 - Supplier clauses included in contracts related to forced labour/child labour
 - Supplier performance or quality monitoring and auditing
3. If concerning information comes forward regarding the potential use or proven facts of Forced Labour from any supplier, Four Rivers Co-op will take responsibility to challenge the supplier on these facts and their operating practices and how they intend to change to be a more socially responsible supplier.
4. If still concerned about the supplier's practices, we will take the responsibility to discontinue product supply until we are confident that appropriate changes have been made that eliminate Forced Labour practices with any specific supplier.

4. Remediation of Forced and Child Labour

Four Rivers Co-op has taken action to remediate potential risks of forced and child labour through deployment of the policies and procedures outlined in Section 2 of the report. In the future, Four Rivers Co-op will explore opportunities to increase auditing and monitoring of suppliers to reduce the risk of forced and child labour. If specific incidents of forced and child labour are identified, Four Rivers Co-op will work with suppliers to determine and implement remedial action.



A handwritten signature in black ink, appearing to read "Floyd Wuthrich", written over a horizontal line.

Floyd Wuthrich
President, Board of Directors

Date *May 23/24*

I have the authority to bind Four Rivers Co-op. The Statement has been reviewed and approved by the Board on behalf of itself.