

FULLERGROUP

Introduction

This document has been prepared by Fuller Group Ltd., Business Number 101903813, in compliance with Section 11 of Bill S-211 for the fiscal year ending December 31, 2023. Fuller Group Ltd. meets the criteria for a Reporting Entity as per the Act, having a place of business in Canada and engaging in business activities within Canada, in addition to meeting the necessary Entity size thresholds for assets and employee count.

Fuller Group Ltd. remains steadfast in maintaining our principles of honesty and integrity throughout our daily operations. We are committed to delivering high-quality products to our patrons. Historically, our operations and supply chain have shown a low risk of modern slavery issues. Nevertheless, we acknowledge the global imperative to eliminate child labour and forced labour. In alignment with Section 11 of Bill S-211, this report outlines the measures we have undertaken to detect modern slavery risks in our operations and supply chain and details how we may bolster prevention in the future.

Section A: Structure, Activities and Supply Chains

Fuller Group Ltd. is a privately held company that owns and operates 17 A&W restaurant franchises under license from A&W Food Services of Canada Inc. across Manitoba. As part of the fast-food industry, our operations are primarily focused on the distribution and sale of food products within Canada. Our supply chain consists of three principal Canada based suppliers: A&W Food Services of Canada Inc., Gordon Food Service Canada, and Canada Bread. Recently, A&W Food Services of Canada Inc. issued a Statement on Fighting Against Forced and Child Labour (which can be found [here](#)). Their comprehensive report details key initiatives such as supply chain mapping, audit programs, and training designed to mitigate the risk of forced or child labour within their supply chain. As A&W Food Services of Canada Inc. is a key supplier of ours, these activities significantly contribute to the mitigation of potential risks throughout our own supply chain. Our strategic supplier relationships ensure a steady and reliable supply of high-quality ingredients that meet our strict quality and ethical standards, enabling us to consistently offer excellent products to our customers.

Section B: Policies and Due Diligence Processes

We are committed to conducting our business in full compliance with all relevant laws and regulations. Given that our suppliers are exclusively Canadian entities recognized for their high standards and considering that A&W Food Services of Canada Inc., our

primary supplier, has implemented significant policies, training programs, and remediation plans to effectively manage the risks of modern slavery, we assess the risk of modern slavery in our activities and supply chain to be low. Consequently, we have not formally established specific policies or due diligence processes aimed at addressing forced or child labour during the past fiscal year. Nevertheless, we recognize the importance of maintaining ethical and responsible business practices. We remain vigilant and prepared to adapt our policies and procedures should our risk profile change in the future as a result of a significant change to our import portfolio.

Section C: Forced Labour and Child Labour Risks

During the last fiscal year, Fuller Group Ltd. did not perform a risk assessment concerning forced or child labour within our supply chain. However, in May of 2024, we initiated a risk assessment process to pinpoint potential areas in our supply chain where such labour risks might exist. This evaluation drew on data from the Walk Free Global Slavery Index and the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour. Our analysis helped us identify possible risks linked to specific goods and geographical regions.

It is important to clarify that the findings from our risk identification exercise do not suggest the actual presence of forced or child labour in our operations or supply chain. Rather, the purpose of this assessment is to foresee potential scenarios where such risks could emerge, allowing us to devise and implement effective preventative strategies. We recognize that no sector is completely immune to the risks of forced or child labour, particularly in parts of the supply chain that operate in areas with weaker regulatory frameworks and enforcement.

Our risk analysis included a geographic assessment based on the Walk Free Global Slavery Index, identifying regions with a heightened risk of forced and child labour practices. This geographic focus was coupled with an evaluation of goods categories deemed at risk, facilitating a more focused approach to our overall risk assessment strategy.

Our findings indicated that the overall risk of forced or child labour within our supply chain is low, as all of our suppliers are based in Canada, a country noted for its low risk related to forced and child labour.

Despite the low risk level identified, we maintain a strong commitment to continuous vigilance and the enhancement of our risk management procedures and policies. The inherent low risk does not lessen our resolve to manage and mitigate potential risks effectively in the future.

In addition to our own risk analysis, A&W Food Services of Canada Inc., a tier-one supplier of ours, conducted supply chain monitoring activities in 2023. These activities revealed that two of their food suppliers were implicated in forced labour investigations involving their subcontractors. A&W Food Services of Canada Inc.

effectively addressed these issues by meeting with the impacted suppliers, confirming their termination of relationships with the subcontractors in question and that they planned to introduce new social compliance requirements in their supply chains. Furthermore, A&W Food Services of Canada Inc. plans to meet with these suppliers again in 2024 to review and assess progress.

Section D: Remediation Measures

During the previous fiscal year, A&W Food Services of Canada Inc., a tier-one supplier of ours identified potential forced labour issues with some of their suppliers and remediated the issue by working with the implicated suppliers to put in place new social compliance requirements in their supply chains. As a result, Fuller Group Ltd. did not need to implement any specific remediation measures of our own. Should we detect any indications of modern slavery in our business activities in the future, we are committed to responding with appropriate and timely remediation measures. We will address such issues thoughtfully and decisively, ensuring our business practices remain ethical and compliant with all relevant laws and standards.

Section E: Remediation of Loss of Income

As A&W Food Services of Canada Inc. addressed the identified issues in their supply chain, Fuller Group Ltd. did not have to implement any remediation measures of our own relating to loss of income. However, should any risks of modern slavery emerge in our activities or supply chains in the future, we are committed to implementing the appropriate measures to remediate any loss of income for vulnerable families.

Section F: Training

During the past financial year, we did not conduct specific training related to forced or child labour, as our assessment indicated that the risks of modern slavery in our operations are low. However, we remain vigilant and open to adapting our training programs for employees should our risk profile change in the future.

Section G: Assessing Effectiveness

Given our evaluation that the risk of modern slavery in our operations and supply chains is minimal, we did not undertake a formal assessment of our effectiveness in preventing forced and child labour in our activities over the past financial year. Moving forward, we will continue to review our risk profile. Should the risk of modern slavery increase, we will implement mechanisms to assess the effectiveness of our initiatives.

Conclusion

We are committed to maintaining the highest standards of ethical conduct and compliance with Bill S-211. Although we assess the risk of child labour and forced labour in our activities and supply chain as low, we are dedicated to continually

monitoring these risks. We are committed to transparency and will adapt our risk mitigation processes as necessary should our risk profile change.

Attestation

Following 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.

Full name KIRK FULLER

Title PRESIDENT

Date MAY 31/24

Signature 

I have the authority to bind Fuller Group Ltd.