



SUPPLY CHAIN RISK REPORT
pursuant to the *Fighting Against Forced Labour and Child Labour in*
Supply Chains Act (Bill S-211)

G3 Global Holdings GP. Inc.,
as general partner of G3 Global Holdings Limited Partnership

PART 1: Statement of commitment

From our inception, we have been driven by the vision of building a smarter path from farmers' fields to global markets. Through our network of high-efficiency facilities, we have transformed Canada's grain supply chain, achieving greater speed and efficiency than ever before. With our clean, modern infrastructure and fast, safe, and efficient operations, we intend to be a sustainable leader in Canada's agriculture industry. We are committed to leveraging these advantages to drive tangible performance on Environmental, Social and Governance (ESG) priorities including ensuring modern slavery risks in our activities or supply chains are appropriately identified, mitigated, and prevented. We are committed to complying with human and labour rights as well as applicable laws, regulations and standards in our operations and the jurisdictions in which we operate.

In recent years, we have been working to integrate a broader set of ESG-related considerations such as environmental impacts and human rights into our supply chain management. To manage potential risks to our supply chain, through these ESG activities undertaken to date, we have established a diligent vendor approval process that integrates insurance requirements, waste management procedures, and codes of conduct. These are intended to minimize potential disruptions to our operations and ensure the highest standards of quality and safety for our customers.

Through 2023, we worked with an external consultant to identify opportunities within our existing policies and procedures such as our Employee Code of Conduct and Supplier Qualification Form to integrate anti-forced and child labour considerations. We have also established a plan for training of our employees on modern slavery risks and the requirements of Bill S-211. We have engaged external support to develop and implement, as appropriate, additional steps for preventing and reducing forced and child labour in our activities and supply chains such as supply chain mapping and risk assessment, remediation measures as well as supplier monitoring.

PART 2: Organizational structure, activities, and supply chain

2.1 Company Structure and Background Information

G3 Global Holdings GP Inc. ('G3GH'), as general partner of G3 Global Holdings Limited Partnership, was incorporated on October 27, 2014, in the Province of British Columbia pursuant to the *Business Corporations Act* (British Columbia) under incorporation number BC1017410. Its registered address is Suite 2600, 1066 West Hastings Street, Vancouver, BC V6E 3X1.



G3GH operates through two entities being G3 Canada Limited ('G3C') and G3 Terminal Vancouver GP Inc. ('G3TV'). G3GH is a private company that has at least \$20 million in assets, has generated at least \$40 million in revenue and through its two operating companies G3C and G3TV indirectly employs approximately 700 employees for at least one of its two most recent financial years. The financial year for G3GH is January 1st to December 31st.

G3C was federally incorporated on January 1, 2016 through amalgamation under corporation number 952533-5 and is also extra-provincially registered in the provinces it operates in, which consists of British Columbia, Alberta, Saskatchewan, Manitoba, Ontario and Quebec.

G3C is a Canadian grain company with its registered and head office located in Winnipeg, Manitoba and it also maintains a corporate office in St. Hyacinthe, Quebec. G3C employs approximately 630 employees.

G3TV, as general partner of G3 Terminal Vancouver Limited Partnership, was incorporated on October 29, 2014 in the Province of British Columbia pursuant to the *Business Corporations Act* (British Columbia) under incorporation number BC1017662. Its registered address is Suite 2600, 1066 West Hastings Street, Vancouver, BC V6E 3X1 but operates its terminal at 95 Brooksbank Avenue, North Vancouver, BC V7J 2B8. G3TV employs approximately 70 employees.

G3GH does not have any of its operations outside of Canada and therefore, does not report under legislation in other jurisdictions, such as the *California Transparency in Supply Chain Act*, the *UK Modern Slavery Act 2015* or the *Australia Modern Slavery Act 2018*.

2.2 Company Activities

G3GH, through G3C and G3TV, sells agricultural commodities to end use customers in and outside of Canada as well as imports into Canada certain commodities produced in the U.S. and overseas.

G3C operates a network of 20 grain elevators in Manitoba, Saskatchewan, Alberta and Quebec and port terminals located in Thunder Bay, Ontario and Hamilton, Ontario as well as in Trois-Rivieres, Quebec and Quebec City, Quebec. G3C also ships grain by rail from the Prairies to G3TV's port in Vancouver. It purchases grains and oilseeds from agricultural producers in the Prairies, Ontario and Quebec, and markets and exports these commodities to foreign and domestic customers.

G3TV receives the grain from the elevators via rail car and loads it into ships at its port terminal in Vancouver which is destined for markets throughout the world.

2.3 Supply Chain

Farmers grow a variety of grain and oilseed crops and G3C enters into contracts with the producers to sell their crops to G3C at a certain price and within a certain time period.

The farmers from whom G3C purchases grains and oilseeds deliver the commodities to G3C by truck. The commodities are stored onsite and loaded onto trains operated by Canada's two major railways and hauled to port terminals and stored and/or loaded onto ships, which are contracted by the buyers of the commodities. Farmers can also deliver directly to G3C port terminals in Ontario and Quebec. G3C owns one laker vessel which transports grain between terminals on the Great Lakes – St. Lawrence Seaway System.



G3TV receives grain from G3C elevators via rail car and loads it into ships at its port terminal in Vancouver, which is shipped to international markets.

Both G3C and G3TV are committed to providing a safe and respectful work environment, and to supporting the success of employees throughout the organization. It encourages women, indigenous people, people with disabilities and members of visible minorities to apply for employment opportunities. The majority of employees are employed on a permanent full-time basis.

PART 3: Approach to Risk Assessment

3.1 Policies and Procedures

In 2023, G3C, on behalf of G3GH, engaged an external consultant to assist with an internal current state assessment and action plan to address the requirements of Bill S-211. The external consultant has provided G3C and G3TV, as relevant, with a prioritized list of corporate documentation and procedures to consider for revision to incorporate anti-forced and child labour provisions in 2024 as follows:

- Employee Code of Conduct
- Recruitment Policy
- Export Controls and Sanctions Policy
- Non-Grain Procurement Policy
- Supplier Qualification Form
- Approved Supplier & Contractor Evaluation Form
- Purchase Contract Terms and Conditions
- Whistleblower Policy training and communications

3.2 Roles and Responsibilities

Responsibilities over supply chain and modern slavery risks are shared across various functional areas including Logistics, Trade Execution, Trading, HR and Corporate Accounting. Oversight and overall governance rests with senior management and the committees of the G3C and G3TV Boards of Directors who would bring matters and issues forward to their respective Boards.

3.3 Risk Assessment Process

G3C and G3TV, on behalf of G3GH, will be developing a process to identify, prevent, mitigate, and account for how it addresses the risk of forced labour and child labour in the supply chain.

PART 4: Identification of high-risk categories

G3C and G3TV, on behalf of G3GH, will be developing a process to identify the parts of the business that carry risks of forced labour and child labour, as well as a process for how to assess and manage those risks.

PART 5: Managing high-risk categories

G3C and G3TV, on behalf of G3GH, will be developing a program to prevent and reduce the risks of forced labour and child labour in the company's higher risk business and supply chains.



PART 6: Remediation Measures

G3C and G3TV, on behalf of G3GH, will be developing a program to remediate any forced labour and child labour in the company's business and supply chains and consider ways to remedy any loss of income that may result from efforts to identify and eliminate forced or child labour.

PART 7: Employee training

In 2023, G3C, on behalf of G3GH, engaged an external consultant to develop training materials on modern slavery risks as well as Bill S-211. This included training the team of individuals responsible for compliance with this legislation for G3C and G3TV. In 2024, training sessions were held and will continue to be rolled out across various levels of management including the Executive Management team and the Board of Directors and specific departments that are directly impacted.

PART 8: Assessing the effectiveness of the company's approach

8.1 Monitoring Approach

G3C and G3TV, on behalf of G3GH, will be developing a program to measure the effectiveness of its efforts to reduce the risks of forced or child labour in its business and supply chain.

8.2 Progress on Prior Year

G3C and G3TV, on behalf of G3GH, engaged an external consultant in 2023 to assist in implementing a program to be able to assess the effectiveness of its policies and procedures in relation to forced labour and child labour.

PART 9: Approval and sign off

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 2023 reporting year.

**Global Holdings GP Inc., as general partner of
G3 Global Holdings Limited Partnership**

Signature: Matthew Daugherty
Matthew Daugherty
Title: Director
Date: _____, 2024

I have the authority to bind Global Holdings GP Inc.