



GROWMARK

(US Headquarters)
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(Guelph, Ontario, CA)
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105 Silvercreek Parkway N
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(Chatham, Ontario, CA)
Great Lakes Grain FS
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Modern Slavery Statement for the Fiscal Year September 1, 2023 ending August 31, 2024.

This statement is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act by GROWMARK, Inc. (“GROWMARK”) outlining the approach and initiatives of GROWMARK to identify and address the risks of forced labour and child labour in its business operations and supply chains during the fiscal year commencing September 1, 2023, and ending August 31, 2024.

GROWMARK is committed to respecting human rights and working towards ensuring our supply chain is free from forced labour and child labour.

Company Structure

GROWMARK is an agricultural cooperative serving almost 400,000 customers across North America, providing agronomy, energy, facility engineering and construction services, logistics services, and grain marketing and risk management services. The sectors in which GROWMARK operates include agriculture, wholesale trade, retail trade, transportation and warehousing, finance and insurance, and the provision of professional, scientific, and technical services. GROWMARK operates with a farmer board of 19 directors, 2 of those directors elected from Ontario. GROWMARK is a US-based company, incorporated in the state of Delaware, with headquarters in Bloomington, Illinois, USA. The Canadian headquarters are located in Guelph and Chatham, Ontario, CA.

GROWMARK’s Canadian operation encompasses the sale of crop inputs, custom crop applications, livestock feed, and the sale of fuel and propane within the division of FS Partners. GROWMARK also provides grain storage and marketing services in Canada through the partnership of Great Lakes Grain. The four product divisions, Agronomy, Grain, Feed, and Energy/Propane also source products for the cooperative member owners, retail division and business interests in Ontario, Canada including AGRIS Co-operative Ltd., Co-operative Regionale de Nipissing Sudbury Ltd., County Farm Centre Ltd., Durham Farmers’ County Co-operative, FS PARTNERS, La Co-operative Agricole d’Embrun Limitee, Lucknow District Co-operative Inc., Midwest Co-operative Services Inc., Sunderland Co-operative Inc., Thunder Bay Co-operative Farm Supplies, Vineland Growers Co-operative Ltd., and Wanstead Farmers' Co-operative Company Limited.

Supply Chain

Our supply chain encompasses many products purchased from Canada and other countries.

Agronomy, grain, animal feed, and energy products are sourced through manufacturers and distributors that specialize in the products needed by our member owners and customers.



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Risks in Supply Chain

Our company is committed to respecting human rights and will continue to work towards ensuring that forced labour and child labour is not a part of any product within our supply chain. Given the location and nature of our operations, we have not historically identified the risk of forced or child labour as a material risk in our activities or in our supply chains.

Actions Taken

GROWMARK has been, and continues to be, committed to due diligence policies and process through its Code of Conduct and complying with all applicable laws relating to forced and child labour in the jurisdictions in the US and Canada in which GROWMARK operates. GROWMARK's Compliance Program and Code of Conduct reaffirms GROWMARK's policy of conducting its business both legally and ethically. The Code of Conduct standards apply to all GROWMARK's businesses and include the expectation that those acting on its behalf will comply with the law, which includes forced and child labour laws.

It is a condition of employment that all GROWMARK employees must be familiar with and comply with the Compliance Program and Code of Conduct in the discharge of their duties. Employees also are required to execute an acknowledgement of compliance annually.

As this is GROWMARK's initial reporting on its supply chain in response to the Canadian act, our work in developing and conducting an internal assessment of risks of forced labour and/or child labour in its activities and supply chains is ongoing. We are committed to identifying, addressing, and prohibiting the use of forced labour and/or child labour in its activities and supply chains. We will distribute this report annually to all GROWMARK management, employees and on GROWMARK's public website.

GROWMARK is committed to developing policy and procedures that enable it to monitor its suppliers and enact measures requiring its suppliers to have in place policy and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and their supply chains.

Risk Assessment

Our company has begun the process of communicating with our suppliers to confirm that they do not distribute goods and services that support or condone child labour or forced labour in Canadian or international supply chains. The process will include developing a questionnaire for all suppliers to attest to their compliance with these expectations.

GROWMARK is communicating with partners in the industry to work together to develop steps going forward to identify risks within its supply chain.



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GROWMARK is developing a policy and procedure for its management and employees to learn about, and to identify and follow GROWMARK's policy on the use of forced labour and/or child labour in its supply chains.

Remediation

GROWMARK recognizes the responsibility that we share with our suppliers to remedy and guard against forced and child labour. Successful remediation is not easy to achieve and requires a victim-led, consultative, and multi-stakeholder approach. We anticipate having an approach based upon the following principles:

1. Definition of a complaint. A complaint is a report of a violation that has occurred in GROWMARK's supply chain and internal business and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.
2. Designing a remediation procedure. GROWMARK recognizes that it is important to identify and establish a remediation team to develop GROWMARK's remediation procedure. This should be made up of representatives from the workforce, managers, and organizations with expertise in forced and child labour where available. If there is an existing government or organization, process or project providing remedy for victims of forced and child labour, these should be identified and involved in the development of the remediation procedure. Protecting the victim of forced and child labour must be the priority of the remediation procedure. The remediation team must seek to understand the specific needs, circumstances, and aspirations of each victim and what it was that pushed them into forced or child labour.
3. Dealing with a case of forced labour and/or child labour. Conduct an initial assessment of the allegations to ensure there is sufficient information to understand the exploitation discovered and remedy it. Ascertain if a supplier or labour provider is implicated. Report the allegations to relevant authorities.
4. Ongoing support and monitoring. Evaluating how effective the remediation procedure was and amending it accordingly. Reviewing internal policies and procedures to determine what needs to change to prevent forced and child labour from re-occurring.

Training

GROWMARK has a long history of annual, mandatory compliance training for all employees to support our Code of Conduct. We are also developing a training policy including awareness of forced labour



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and/or child labour, identifying the risks within our supply chain, and creating a remediation policy and procedure.

This training policy would include a review of the policy on an annual basis and may include on-going compliance seminars and awareness campaigns.

Effectiveness Assessment

Once we have had our training and policy developed, we would include the number of employees trained each year. We intend to develop awareness campaigns and seminars that employees attended.

We also intend to record how many suppliers we have communicated with to confirm supply chain policy and record questionnaires and investigations/audits of any suppliers.

Attestation.

This report has been presented to GROWMARK’s board of directors and approved pursuant to Section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Signed,



Ashley McClintock
Executive Vice President, Human Resources
GROWMARK, Inc.
Authorized Signatory

5/24/2024 Date