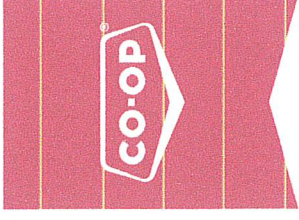


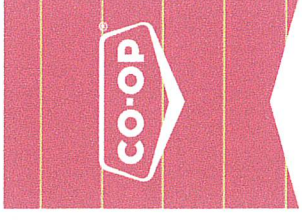
Forced Labour in Canadian Supply Chains

Gilbert Plains Co-op Ltd.

DATE: 2024-05-24



Contents	
Introduction.....	3
1. Structure, Activities, and Supply Chain	3
2. Policies and Processes in Relation to Forced and Child Labour	5
3. Identification of Risks	7
4. Remediation of Forced and Child Labour.....	8
5. Remediation of Loss of Income	9
6. Employee Training	9
7. Efficacy of Actions	9
8. Approval and Attestation of the Report	10



Introduction

This report is Gilbert Plains Consumers Co-operative Limited (Gilbert Plains) 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 January 31, 2024. Operational information included in this report reflects the period January 30, 2023 to February 3, 2024. In this statement, the terms 'the Co-op', 'we', 'us', and 'our' refer to Gilbert Plains. The reporting entity covered by this statement is Gilbert Plains, Business Number 102090156.

For the purposes of the Act, Gilbert Plains meets the entity definition by having a business in Canada, doing business in Canada, and meeting two of three threshold criteria for revenue and assets. Gilbert Plains 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.

Gilbert Plains 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, Gilbert Plains 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 Integrity, Community and Excellence, Gilbert Plains is committed to making ethical business decisions and taking proactive measures to address issues such as forced and child labour.

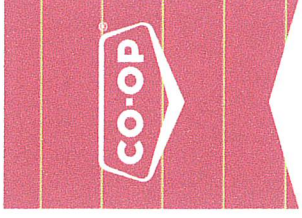
1. Structure, Activities, and Supply Chain

Structure

Gilbert Plains Co-operative Ltd. is a retail co-operative based in Gilbert Plains, Manitoba, Canada. Co-ops like Gilbert Plains operate on a member-owned basis, where members have a say in the governance and direction of the cooperative. Members control their cooperative through a Board of Directors that they elect from among themselves. The Board of Directors is responsible for overseeing operations, approving annual budget, and selecting a Management Team (i.e., Agro Manager, Administration Office Manager, Human Resource Manager, and Petroleum Manager) that is responsible for day-to-day operations.

Organizational Mandate or Role

As part of the Co-operative Retailing System (CRS), Gilbert Plains helps build, feed and fuel individuals in our local communities.



We employ approximately 65 individuals. Gilbert Plains Co-op is a member of the Fusion Credit Union.

Based in Gilbert Plains, Manitoba, this Co-op 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). Gilbert Plains is in turn owned by 2,675 members mostly living in Manitoba, as part of the CRS, Gilbert Plains helps build, feed and fuel individuals and in our local communities.

Activities

Gilbert Plains is a business-to-consumer centric co-operative primarily serving the communities of Grandview, Ethelbert, Dauphin, Roblin, Russell, Swan River, and Gilbert Plains in southwestern Manitoba. Our core retail lines of business include agriculture, general merchandise, and fuel.

Wholesale and Retail Trade

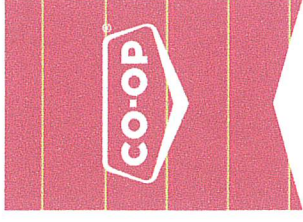
FCL sources and distributes products across many primary consumer and business lines to Gilbert Plains with 3 physical retail locations primarily serving 7 communities in Manitoba including agriculture and farming supplies, crop inputs, fertilizer, agricultural equipment, livestock feed, propane, lubricants, and petroleum.

Gilbert Plains sources 44 percent of the products for resale from FCL. These products are purchased by FCL from within Canada or imported and distributed throughout the CRS using FCL's fleet, distribution centres, bulk fuel distribution centres and fuel terminals.

The remaining 56 percent of products are primarily sourced by Gilbert Plains from fertilizer, animal and livestock equipment, and agriculture equipment parts suppliers in Canada and the United States.

Supply Chain

Gilbert Plains' management is committed to sourcing products through FCL where possible and does source some products (i.e., mostly fertilizer, animal and livestock equipment, and agriculture equipment parts through local non-FCL entities for resale to meet customer needs.



Wholesale and Retail Trade: Products Sourced for Resale

Gilbert Plains resells several categories of goods, including agriculture, energy, good, general, and merchandising goods.

CATEGORY	DESCRIPTION
AGRICULTURE	Fertilizer, animal and livestock equipment, and agriculture equipment parts
ENERGY	Fuel, lubricants, propane
GENERAL MERCHANDISE	Wholesaler and private label products (hardware, tools, paint, seasonal, plumbing, electrical products, and a short line of farming needs)

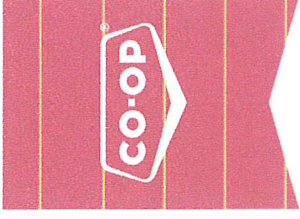
2. Policies and Processes in Relation to Forced and Child Labour

Internal

Gilbert Plains maintains an Employee Code of Conduct policy to which all employees must adhere to and acknowledge through an attestation at time of hiring. Gilbert Plains 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. Policies are in place and provide guidance on discrimination and harassment definitions, disruption and retaliation, complaint procedures, rights, remedies, and corrective actions. Procedures are put in place to protect the anonymity of those who report concerns from retaliation. Gilbert Plains' Human Resource team regularly reviews human resource related policies to ensure Gilbert Plains remains in compliance with applicable workplace and labour legislation.

Gilbert Plains has several standardized policies and procedures, contained within the Employee Manual, including business ethics, discrimination and harassment, and general human resource policies. Human resource policies provide definitions on manager, supervisor, human resource, and employee classification for permanent, part time, seasonal and casual employees; probation periods; periods of employment; pay and pay administration; terms of service; and employment file. Within these human resource policies, guidance is provided on compensation, benefits and pension, leaves, Code of Conduct, safety and health, recruitment, daily operations (i.e., hours of work, expectations, rest, tardiness and absenteeism, housekeeping, and merchandise removal and purchase), dress code, employee records, performance management and concerns, learning and development, and conclusion of employment.

Gilbert Plains adheres to the Manitoba Workplace Safety & Health Act and has a commitment



to safety and health policy with defined rights and responsibilities, and mechanisms for reporting.

Gilbert Plains ensures that there is reduced risk of forced or child labour in operations through strict adherence to provincial and federal labour laws. As per Manitoba's labour laws, Gilbert Plains Co-op does not employ anyone under the age of 14 and follows all applicable young worker restrictions for employees under the age of 14. Young persons ages 14 and 15 must take [Manitoba Young Workers Readiness Course](#). Young people, 14 or 15 years of age, are not allowed to work alone and must be directly supervised by an adult who is in the workplace. Young people under 18 years of age cannot work alone between 11:00 p.m. and 6:00 a.m.

Gilbert Plains is exploring the implementation of effective grievance and remediation mechanisms to address concerns or potential cases of forced and child labour in the supply chain. Gilbert Plains' 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 with the employer, alert national authorities and consult a third-party expert organization;
- Implementation of a software solution to audit suppliers; or
- Develop a grievance mechanism that suppliers' employees can access anonymously in a format that is inclusive and accessible.

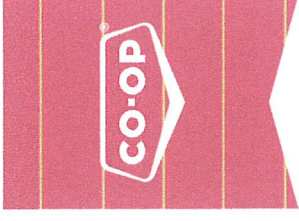
Suppliers

Outlined below are the due diligence policies and processes FCL has embedded to reduce the risk of forced and child labour in supply chains.

In 2022, FCL launched the Care for the Environment brand attribute, which focuses on purchasing responsibly, promoting regeneration, reducing emissions, and eliminating waste. Sustainable and responsible product purchasing is one of the many guiding aspects that help FCL define what products to introduce to the CRS. FCL strives to collaborate with suppliers to understand their environmental and social performance and identify future supply chain opportunities across all business lines.

FCL has a Social Responsibility Agreement with home and building suppliers. These agreements ensure private label suppliers are supporting commitments to responsible sourcing, providing workers with fair wages and working hours, and a safe, clean, and healthy work environment and to confirm they meet the basic principles of human rights and do not use forced, prison, or child labour.

FCL has actively engaged in initiatives to combat forced and child labour and promote ethical



practices such as sourcing 115 certified fair-trade products.

In 2023, FCL continued its involvement with the Retail Council of Canada (RCC) Responsible Sourcing Committee, collaborating with prominent Canadian companies in the retail sector. RCC's Responsible Sourcing Committee enables FCL to stay apprised of current issues and emerging trends related to responsible sourcing, and to gain insights and learn best practices from leaders in the field.

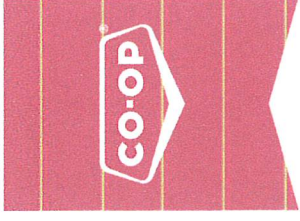
Gilbert Plains sources 44% of their goods for resale from FCL, FCL has a long tradition of sourcing local products and supporting local businesses. Gilbert Plains sources 56% of their goods through non-FCL vendors, which includes mostly fertilizer, animal and livestock equipment, and agriculture equipment parts; with most items sourced from local or Canadian vendors. These non-FCL vendors are primarily located in Manitoba and Saskatchewan with others sourced from across Canada (i.e., British Columbia, Alberta, Ontario, Quebec, and New Brunswick); and the remainder of non-FCL vendors are sourced from the United States (i.e., located in North Dakota, Iowa, Maryland, Minnesota, Colorado, and Oklahoma).

3. Identification of Risks

Gilbert Plains' main supplier, FCL, accounts for 44% of total procured goods. In assessing the risk of forced labour or child labour at the direct supplier level for this relationship, FCL has concluded on the following assessment of the use of child labour and/or forced labour within their supply chain, 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*:

1. Goods procured for home building centres:
 - a. Key suppliers of FCL's home building centres import from China, which has been identified as a country with a high inherent risk of forced and child labour. To mitigate this risk, FCL requires key suppliers to sign a Social Responsibility Agreement. The agreement requires suppliers to ensure they are supporting commitments to responsible sourcing and provide workers with fair wages and working hours, as well as a safe, clean, and healthy work environment.

FCL is exploring opportunities to understand and reduce the risk of forced and child labour within their supply chain therefore, Gilbert Plains will be relying on this on-going assessment to continue assessing goods procured from FCL.



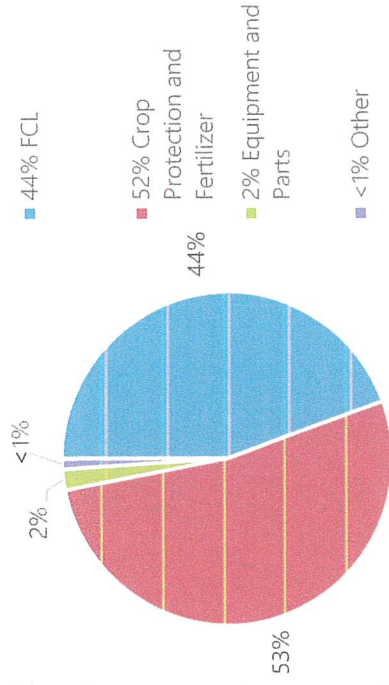
The remaining 56% of goods purchased by Gilbert Plains are procured from outside of FCL. Gilbert Plains has three main categories of goods for resale, which include, direct to store fertilizer and animal and livestock equipment, and agriculture equipment parts. These product lines are sourced from Canada, which is not a high-risk country for forced and child labour. The adjacent Figure 1 represents the categories of goods for which a risk assessment was conducted.

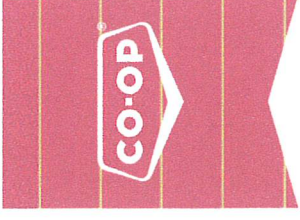
To mitigate the inherent risks Gilbert Plains utilizes the following policies, procedures, and management oversight controls: business ethics policy, discrimination and harassment policy, and general human resources policies which includes a Code of Conduct. Within these policies, there is a clear statement on working conditions and employee rights and conduct, employer obligations and conduct, recruitment, and selection processes, and provide overarching context for the employee lifecycle. Altogether, these policies provide a foundation that balances employee and employer rights with member and community interests to create a positive, healthy, effective, reasonable, profitable, and sustainable co-operative, with defined oversight roles and responsibilities of a governing Board. Within this context, the Management Team is entrusted by the Board to follow the Co-operative Policies, Collective Acts, Regulations, Bylaws, and laws specific to Gilbert Plains.

4. Remediation of Forced and Child Labour

Gilbert Plains 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, Gilbert Plains 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, Gilbert Plains will work with suppliers to determine and implement remedial action.

Figure 1. Gilbert Plains Co-operative, Summary of Procurement





5. Remediation of Loss of Income

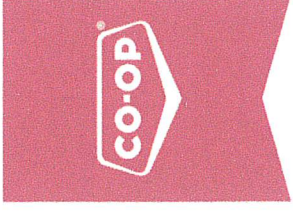
Gilbert Plains has not identified any child or forced labour in operations or supply chains, and therefore no measures have been taken to remediate the loss of income to vulnerable families that results from any measures taken.

6. Employee Training

At the time of onboarding and periodically thereafter as required training and attestation are completed for all employees to ensure compliance with Gilbert Plains' Code of Conduct on company ethical standards, policies, laws, and regulations. The Code of Conduct is applicable to everyone that conducts business on behalf of the organization, which includes the Board of Directors, the Management Team, and all current and new employees. Gilbert Plains has identified the opportunity to incorporate human rights awareness training into the annual Code of Conduct attestation to create awareness and the associated risks of forced and child labour. In addition, Gilbert Plains is exploring opportunities to provide role specific training to educate team members and help them identify and respond to risks of child and forced labour in supply chains. These opportunities will be evaluated through fiscal year 2024.


7. Efficacy of Actions

Gilbert Plains has conducted a review of current policies and procedures as they pertain to child and forced labour and is currently evaluating further measures to assess the efficacy of actions. Success will be evaluated by tracking relevant performance indicators, such as levels of employee awareness, number of vendors signing the Social Responsibility Agreement, number of employees in procurement roles participating in training, as well as an annual review of the policies and procedures in place related to forced and child labour.





8. Approval and Attestation of the Report

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 reporting year listed above.

Full Name: Lyle Gouldsborough
Title: Agro Manager
Date: May 30, 2024
Signature: 

Full Name: Sharmin Rodgerson
Title: Petroleum Manager
Date: May 30, 2024
Signature: 

Full Name: Deanna Gouldsborough
Title: HR Manager
Date: May 30, 2024
Signature: 

Full Name: Lisa White
Title: Office Administration Manager
Date: May 30, 2024
Signature: 

We have the authority to bind Gilbert Plains Consumers Co-operative Limited. The Statement has been reviewed and approved by the Board on behalf of itself.