

GUENTHER BAKERIES CANADA ULC

Introduction

This is a joint report filed by Guenther Bakeries Canada ULC and Les Plats du Chef ULC (collectively, “CHG Canada” and “we”) on forced labour and child labour under Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). This report covers activities for the financial year ending March 31, 2024 and sets out the steps that CHG Canada has taken and is continuing to take to prevent and reduce the risk that forced labour and child labour are taking place in its supply chain or business.

CHG Canada is committed to conducting all aspects of its business in a socially responsible manner. This includes preventing the use of forced labour or child labour to directly or indirectly manufacture any products, ingredients, packaging, or other items for our business operations

Organizational structure, activities and supply chain

CHG Canada are wholly owned subsidiaries of Guenther Management Limited, which, together with its other subsidiaries, operates as C.H. Guenther & Son (“C.H. Guenther & Son”). C.H. Guenther & Son is a leading producer of grain-based and frozen food products for foodservice, quick serve restaurant, club and retail customers. Since its establishment by the Guenther family in 1851, C.H. Guenther & Son has continuously evolved, transitioning from our iconic Pioneer brand to becoming a leading supplier of bakery products for renowned restaurant chains. Our foundation is rooted in principles of ethics, honesty, and responsibility, which have shaped our reputation. Throughout the years, we have remained committed to these values while also driving innovation in the food industry.

C.H. Guenther & Son operates 29 manufacturing facilities across the U.S., Canada, and Europe, with a diverse range of products including artisan breads, buns, biscuits, cookies, desserts, gravy mixes, spices, frozen appetizers, snacks, pizza mixes, and dough. With a global reach, C.H. Guenther & Son serves over 2,400 customers and employs more than 4,000 people worldwide. Notably, in 2023, C.H. Guenther & Son earned the distinction of being named one of America’s Greatest Workplaces for Diversity by Newsweek. In Canada, CHG Canada has a dedicated workforce of approximately 975 employees. CHG Canada operates through 6 facilities in British Columbia, Alberta, Ontario, and Quebec producing buns, bagels, and a range of prepared foods.

Approximately 77.5% of CHG Canada’s raw ingredient supply is sourced from Canadian suppliers.

Policies and due diligence processes in relation to forced labour and child labour

C.H. Guenther & Son places a strong emphasis on sustainability, which is reflected in the commitment of our leadership teams. In 2019, we appointed a full-time sustainability manager to effectively integrate existing best practices, align with our corporate culture, and address emerging priorities, including the prevention of forced labour.

Our policies and practices are firmly rooted in the principles outlined in the Universal Declaration of Human Rights. We have integrated our dedication to social responsibility into our mission, vision, and core values of People, Customer, Quality, and Growth.

C.H. Guenther & Son has established a comprehensive Corporate Social Responsibility Policy that applies to all employees, including CHG Canada. This policy underscores C.H. Guenther & Son's commitment to prevent the use of forced labour or the employment of workers below the legal age in the manufacturing of any products, ingredients, packaging, or other essential items for our business operations.

Furthermore, recognizing the evolving demands of our customers in enhancing their own supply chains, we understand the importance of offering products made with sustainable ingredients. Sustainability encompasses not only the sourcing of ingredients but also the fair treatment and compensation of farmers and employees involved in the production process. To this end, C.H. Guenther & Son has implemented a Supplier Code of Conduct that all vendors are required to follow. The Supplier Code of Conduct applies to CHG Canada. This code establishes the standards and guidelines for ethical and responsible conduct throughout our supply chain. Additionally, vendors are obliged to provide sustainability-related information through our supplier and ingredient tracking system.

Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

In early 2022, C.H. Guenther & Son conducted a third-party materiality assessment to survey investors, management and employees, customers, and suppliers to identify pertinent sustainability issues. In addition, C.H. Guenther & Son engaged an outside consultant to identify those sustainability risks most likely to affect C.H. Guenther & Son operations. CHG Canada has not identified any risk of forced labour or child labour in its operations or supply chains.

Any measures taken to remediate any forced labour or child labour; Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

C.H. Guenther & Son has established two anonymous reporting processes for employees to report any violations or submit a complaint. Both reporting mechanisms are available to all C.H. Guenther & Son employees, including those employed by CHG Canada.

The Straight Talk Program provides a method for direct and confidential communication to the Company's President & CEO. Employees can submit a Straight Talk by either placing a sealed envelope (labeled Confidential Straight Talk) in a designated drop-box located at each facility or by mailing a sealed envelope (labeled Confidential Straight Talk) directly to the office of the President & CEO to be reviewed and resolved.

Alternatively, employees can use the Ethics Hotline which is hosted by a third-party hotline provider, Ethics Point. Employees can report a violation and/or complaint confidentially by calling a designated phone number or by completing an online report using a website available on C.H. Guenther & Son's intranet.

As of the date of this report, CHG Canada is not aware of any incidents of forced labour or child labour in its operations or supply chain that occurred in 2023. Consequently, no remedial actions or measures have been necessary, nor has there been a need to address any resulting income loss for affected families.

Training provided to employees on forced labour and child labour

CHG Canada requires all new employees to receive training on the Corporate Social Responsibility Policy, as well as on how to report issues of concern using the reporting tools as part of the orientation process. Additionally, training is also provided on an as needed basis as determined by management. All employees are also provided with copies of the Corporate Social Responsibility Policy and must confirm receipt of the policy either electronically via the Employee Service Self system or by signing a hard-copy acknowledgment form that will be kept on file in their personnel folder located in the local Human Resources office.

Assessing effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

We recognize the importance of monitoring our business and supply chains to track our progress in eliminating forced and child labour. Moving forward, CHG Canada will identify opportunities to collaborate with employees, leadership, suppliers, and other stakeholders to identify effective methods for tracking our effectiveness in ensuring that forced and child labour are not used in our operations and supply chains. We are proud to strive toward improvement, year after year.

Approval and Attestation

This report was approved and attested as of May 29, 2024 as required under subparagraphs 11(4) and 11(5) of the Act by the Board of Directors of CHG Canada for its prior financial year ended March 31, 2023.

Full name: Brooks Meltzer

Title: Vice President, General Counsel and Secretary

Date: May 29, 2024

Signature: Brooks Meltzer

I have the authority to bind CHG Canada