Forced Labour and Child Labour Statement 2023

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Modern slavery, in particular human trafficking, is an international problem and takes a number of forms, including exploitation, forced labor and domestic servitude.

At Hallmark Poultry Processors Ltd. (DBA Hallmark Farms) we acknowledge we have a responsibility in playing a role in eradicating modern slavery. Hallmark Farms believes in the fair treatment and remuneration of employees. We comply with all applicable employment legislation and industrial instruments and no employee is paid less than the minimum wage. Hallmark Farms also invests in the safety, health and wellbeing of its staff.

Hallmark Farms has in place for its employees wages and compensation based at minimum in line with provincial legislation.

Hallmark Farms's has expectations of how its management team should relate to one another including how we employ people and abide by current employment laws.

Hallmark Farms seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Hallmark Farms expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

This Modern Slavery Statement relates to our actions and activities for the Hallmark Farms financial year from 1 January to the 31 December 2023 and complies with the mandatory reporting requirements for modern slavery statements in line with the Modern Slavery Act.

Murdock Pollon

Senior Management

Mandatory Reporting Criteria

Requirement

- 1. Identification of the reporting entity
- 2. Hallmark Farms's reporting structure, operations and supply chains
- 3. Description of modern slavery risks in Hallmark Farms's operations and supply chains
- 4. Description of actions taken by Hallmark Farms, Governance and Due Diligence
- 5. Effectiveness of these actions
- 6. Consultation process
- 7. Other relevant information

1. Identification of the reporting entity

This statement relates to the responsibilities of Hallmark Farms. It ensures that the company follows similar policies and procedures to undertake effective steps to identify and remove contemporary slavery.

2. Hallmark Farms's reporting structure, operations and supply chains

Structure

Hallmark Farms is a privately owned, leading food manufacturer and supplier of fresh and frozen poultry locally, and across Canada.

With approximately 550 full time employees, Hallmark Farms produces approximately 55% of BC's Coastal fresh poultry and is strongly committed to delivering safe products of a consistently high quality together with exemplary customer service to a broad range of customers including major retailers, local restaurants, food service distributors and wholesalers.

Operations and supply chains

Hallmark Farms sources its goods and services from suppliers which predominately consists of live poultry, packaging, ingredients, consumables and uniforms. Some of the services we access are for cleaning, freight, waste management and network and communications to name a few. The majority of our suppliers are based within Canada, however there is a small minority of goods that are sourced from overseas.

At Hallmark Farms, we source all of our raw materials from reputable, licensed producers to ensure our products are of the highest quality and standard.

The Hallmark Farms website at https://hallmarkfarms.ca/ will provide you with a greater understanding of the business, our products and people and the areas we operate and customers we supply.

Predominately our operation consists of:

Primary Processing and Distribution:

Hallmark Farms has one poultry processing plant located in Vancouver, British Columbia, and produces poultry products which are mainly distributed through major supermarkets, independent supermarkets, local restaurants, and food service wholesale distributors. There are approximately 550 people employed at the site.

3. Description of modern slavery risks in Hallmark Farms's operations and supply chains

Operations

At Hallmark Farms we consider that we are a low risk of modern slavery practices as we have no operations outside of Canada.

The vast majority of employees employed by Hallmark Farms are employed directly. Hallmark Farms employees are treated fairly, equitably and remunerated in line with Provincial legislation. Hallmark Farms fair compensation awards cover key areas including wages, hours of work, overtime conditions, additional remuneration, and leave entitlements. For more senior positions, they are engaged under the terms of a common law contract, which is well above the minimum conditions. All BC employees remain subject to the minimum conditions in the BC's Employment Standards Act, which is regularly reviewed. These conditions are supported by a range of policies and procedures providing additional benefits. Hallmark Farms's employment practices comply with all federal and provincial laws within Canada.

Our recruitment processes are strongly supported by Hallmark Farms's policies and procedures. Employment decisions are made on the principle of merit, with no instances of forced labour. All employees are required to demonstrate their legal right to work in Canada. For those employees who hold authorized work permits, Hallmark Farms regularly checks to ensure that an employee's work permit is still valid and any other limitations that may be placed on their work permit.

Supply Chains

Hallmark Farms sources its products and services predominately from within Canada with minimal products coming from overseas.

Hallmark Farms maintains a high ethical standard across its operations. It's our policy to ensure that the ethical standards that apply within our own business are also adhered to in our supply chain. The identification of risk within our supply chain is a key initial step in understanding what's required and prioritising actions.

While Hallmark Farms predominately sources goods and services from within Canada, there are most likely inherent risks further down the supply chain. There may be situations where service or product supplied to Hallmark Farms by an organisation doesn't breach any modern slavery requirements,

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however if the organisation sourcing the products is getting them from overseas, this could be identified as a potential risk. An example could be the purchase of electronic equipment. Hallmark Farms may be purchasing from a reputable supplier within Canada, however the item or components may be manufactured and produced overseas where modern slavery practices may be breached.

At Hallmark Farms we operate a Supplier Approval Program which incorporates *Food Fraud Vulnerability Self Assessment* and *Food Defense & Food Fraud Plan.* While these tools are predominately food protection focused and used to mitigate food fraud/tampering, the current questionnaire has been reviewed and updated to ensure all suppliers and service providers are providing feedback relating to social workplace accountability which does talk about their employees being legally able to work in Canada, paid the minimum wage, employees are appropriately trained, contracts comply with Canadian laws, etc.

4. Description of actions taken by Hallmark Farms, Governance and Due Diligence

RISK

Corporate Clothing and other goods

ISSUE

Possible risks may be:

- forced labour is used to manufacture
- below minimum wages paid
- Unsafe work conditions

ACTION

 Corporate suppliers will receive a letter from Hallmark Farms which will outline third party requirements with regard to modern slavery.

Operations

Hallmark Farms seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Hallmark Farms expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

Hallmark Farms has certain policies in place to assist in ensuring that modern slavery is not taking place in its business or operations. An example of such policies is:

- Recruitment Policy and Procedures: all recruitment and selection procedures and decisions will
 reflect Hallmark Farms's commitment to providing equal opportunity by assessing all potential
 candidates according to their skills, knowledge, qualifications and capabilities. No regard will be
 given to factors such as age, gender, marital status, race, religion, physical impairment or political
 opinions.
- Health & Safety Policy and Procedures: all employees undergo orientation training to ensure they
 understand all hazards and risks that they may encounter during employment. We perform yearly
 refreshers of safety training, as well as monthly toolboxes, and special toolbox presentations to
 continue to ensure all employees' health, safety and welfare.

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 Harassment and Violence Policy: Hallmark Farms is an equal opportunity employer and is committed to providing a harassment, bullying, and victimisation free workplace where all people are treated with dignity, courtesy, respect, and fairly on the basis of individual merit.

5. Effectiveness of these actions

Our policies define the standards of behaviour expected of all associated with Hallmark Farms, including suppliers. These policies set out Hallmark Farms's expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

6. Consultation process

Hallmark Farms has involved its key management teams – Operations, Quality Control and Human Resources, in order to prepare and complete this Statement.

7. Other Relevant Information

While Hallmark Farms is confident that as a result of all of the external audits conducted at Hallmark Farms's facility we meet the modern slavery requirements for our immediate business operations, there is still some work that needs to be done across all of our suppliers in the supply chain area. This includes:

- Continued improvement of our orientation processes to ensure all employees are trained and aware of Hallmark Farms's commitment to ensure social welfare and accountability.
- Continued improvement of our Supplier Approval Program to define the standards of behaviour expected of all Hallmark Farms suppliers.

By focusing on the above, this will ensure that we as a business are reasonably confident that the suppliers, we source our goods and services from, are meeting the modern slavery requirements.