



## Introduction

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Highbury Canco (“Highbury”) is committed to the protection of human rights in all its business practices, operations and supply chains. This includes the prevention of modern slavery, forced labour and child labour in both our internal business practices and supply chain operations. Highbury commits to lawful and ethical conduct in all our business operations and decision-making processes. Highbury conducts its business in accordance with the law and regulatory policy as stated in the Highbury Code of Conduct.

Integrity, honesty and fairness are the core values that are woven into our business operations. We adopt these values and maintain truthful relations with all individuals and companies we conduct business with.

## Structure, Activities & Supply Chain

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Highbury Canco (“Highbury”) operates as a corporation at 148 Erie Street, South Leamington, Ontario. The financial reporting year of Highbury covered by this report is January 2<sup>nd</sup>, 2023, to December 31<sup>st</sup>, 2023. Highbury satisfies the definition of an Entity within the Act by having a place of business in Canada, conducting business in Canada, having assets in Canada and meeting two of the three size-related thresholds. Highbury employs 499 staff members, with the entirety of our workforce residing in Ontario.

### Structure

Highbury is a Canadian food processing company that specializes in packaging and processing a variety of food products, including canned goods, beverages, sauces, and condiments. We operate in a modern facility equipped with state-of-the-art technology to ensure high-quality products and efficient production processes. Our expertise lies in processing a wide range of food products to meet the diverse needs of our customers. From classic canned goods like fruits and vegetables to refreshing beverages, flavorful sauces, and delicious condiments, we have a passion for delivering high-quality products that bring joy to every table. In addition to our commitment to quality, sustainability is a core value that drives everything we do. We continuously explore ways to minimize our environmental footprint, from optimizing our production processes to sourcing ingredients responsibly.

This is the first version of the report submitted and the report is for the entity Highbury. There are no other reporting requirements under other jurisdictions.



## Activities

Highbury operates primarily in the food processing sector. As a food processing company, we specialize in taking raw agricultural products and transforming them into packaged foods ready for consumption. This sector encompasses a wide range of activities, including canning, bottling, freezing, and packaging various food items such as fruits, vegetables, beverages, sauces, and condiments. Our focus is on delivering high-quality and nutritious products to consumers while also prioritizing innovation, sustainability, and customer satisfaction.

In addition to food processing and packaging operations, Highbury engages in innovation and product development by collaborating with customers to develop new food products and packaging solutions. This may involve experimenting with different recipes, flavors, and packaging formats to meet consumer preferences and market trends.

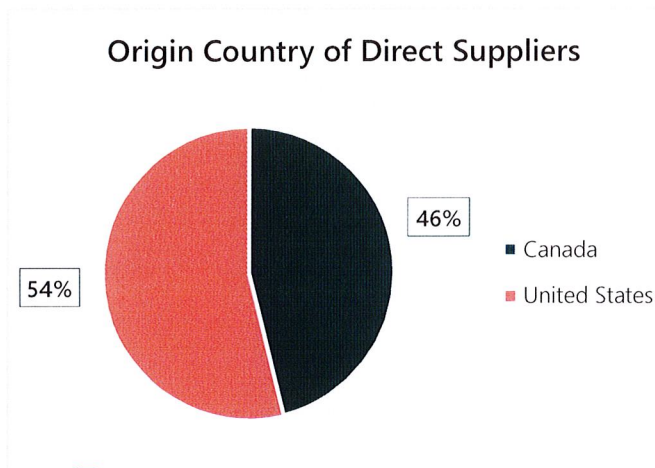


Figure 1

## Supply Chain

Highbury directly procures goods from companies operating out of the United States (U.S.) and Canada. It is possible that some vendors have parent companies residing outside of North America. We have analyzed the office addresses of all our vendors and found that they are mostly North American (see *Figure 1*). Highbury currently has limited visibility on the full geographical reach of its suppliers' locations and limited knowledge of the origination of where suppliers source their goods.

Highbury procures its goods from two origin countries. While we know that some of their vendors purchase goods from foreign countries, we do not know the full extent to where our vendors purchase their goods from. We are also aware that we purchase finished goods that are made up of many different components and materials.

*Figure 1* represents the makeup of our supply chain by country and total purchasing spend. Countries accounting for less than 0.5% of the total purchasing spend were not included in the risk assessment analysis. Highbury has 228 direct suppliers, with 98 of our vendors located in the U.S. and 84 in Canada. In fiscal year 2023, Highbury procured 80% of goods directly from entities in the United States and Canada.



## Policies & Due Diligence

Highbury Canco (“Highbury”) has the following internal policies in place relevant to this Act:

Policy	Description	Support in Mitigating Risk of Modern Slavery
<b>Code of Business Conduct</b>	<ul style="list-style-type: none"> <li>Principles that define desired behaviours and ethical standards for Highbury’s employees and staff. The code promotes integrity, professionalism, and ethical decision-making, and good judgement.</li> </ul>	<p>A code of conduct sets cultural standards and a dedication to be accountable for doing what is right. Employees are required to speak up if they identify any injustices in Highbury’s operations or code of ethics. It is part of our duty to our members and stakeholders.</p>
<b>Sustainable Development</b>	<ul style="list-style-type: none"> <li>Outlines Highbury’s commitment to balancing economic growth, social progress, and environmental protection to meet the needs of the present without compromising the ability of future generations to meet their own needs.</li> </ul>	<p>A sustainable development policy provides a framework for companies to integrate social, environmental, and ethical considerations into their business operations, contributing to the prevention of child labour and forced labour. By promoting responsible business practices, companies can play a crucial role in advancing the fight against exploitation and abuse in global supply chains.</p>
<b>Union Collective Agreement</b>	<ul style="list-style-type: none"> <li>Outlines the terms and conditions of employment for the workers covered by the Unions, addressing various aspects of working conditions, wages, benefits, and rights in the workplace.</li> </ul>	<p>Union agreements can empower workers to negotiate for fair wages, safe working conditions, and develop policies that protect against exploitation. Unions monitor workplaces, advocate for stronger labour laws, provide support networks, and collaborate internationally to address labour abuses. By establishing legally binding contracts that prioritize worker well-being, union agreements serve as a critical tool in the fight against child labour and/or forced labour.</p>





### **Communication & Professional Etiquette**

- Establishes Highbury's expectations regarding communication norms and professional behavior, ensuring that employees understand the standards they are expected to uphold in their interactions with colleagues, clients, and stakeholders.

A communication and professional etiquette policy fosters a positive workplace culture by setting clear expectations for respectful behavior and effective communication. This promotes ethical standards, encourages open dialogue and supports collaboration to indirectly contribute to the fight against instances of child labour and forced labour.

### **Diversity & Inclusion**

- Outlines the Highbury's commitment to promoting diversity and fostering an inclusive environment where staff members feel supported and empowered to succeed. This policy establishes guidelines and initiatives aimed at eliminating discrimination, bias, and barriers to participation.

By ensuring equal access to employment opportunities and career advancement for all individuals, regardless of background, the policy helps create pathways to economic empowerment that can reduce vulnerability to child labour and forced labour.

### **Workplace Violence & Harassment**

- Outlines Highbury's stance against harassment and violence and establishes procedures and guidelines for reporting incidents of violence, intimidation, harassment, sexual harassment and bullying on company premises, at company events or while conducting company business.

A clear harassment policy establishes a safe and respectful workplace environment. The policy outlines the method for reporting any issues employees encounter, including instances of violence that may lead to cases of child labour and/or forced labour within Highbury's internal operations.



## Due Diligence with the Suppliers

Highbury Canco (“Highbury”) has a Vendor Approval policy that outlines the vendor selection procedure to prevent the risk associated with sourcing raw materials and/or ingredients. This policy utilizes food safety guidelines to ensure suppliers are being assessed for biological risks, chemical risks, physical risks and economically motivated hazards. During the initial assessment the supplier must provide product specifications, letter of guarantee, conformance certificate and vendor questionnaire. Once a vendor has undergone the initial assessment, they are added to an Approved Vendors Registry.

Additionally, vast majority of the spend comes from vendors that have been vetted by Fortune 500 food companies. These organizations require all suppliers to sign off on a Code of Conduct, which serves as a guide for ethical behaviour and compliance with supporting laws and regulations across all of their operations. There is explicit language prohibiting the use of forced labour and child labour outlined in these documents. This added level of due diligence further mitigates the risk of forced labour and/or child labour in Highbury’s operations and supply chain.

Additionally, the Approved Vendor Registry is reviewed monthly to ensure all supplier documentation is active and compliant with food safety standards and guidelines. The top 80% of Highbury’s largest vendors are reviewed annually on overall performance, and a general evaluation of the relationship. This review may address concerns including invoicing, timeliness of shipments, quality, and general product condition. Highbury reserves the right to disqualify vendors based on poor service, expired certifications, product recalls, or issues related to documentation. Finally, Highbury conducts ad hoc supplier visits when faced with quality and/or production-related issues. Though these reviews/visits have not historically assessed supplier compliance in relation to the Act, doing so in the future will allow us to identify emerging supply chain risks and raise awareness of forced labour and child labour with our vendors. This provides Highbury with the opportunity to discuss issues related to this Act with suppliers.

## Risk Assessment

A risk assessment of the goods procured by Highbury Canco (“Highbury”) and countries from which the goods are procured from has been performed in relation to the Act. This risk assessment used two separate indices to conclude on inherent risk of forced labour and child labour related to goods and countries — Walk Free’s Global Slavery Index and the US Department of Labour’s List of Goods Produced by Child Labour or Forced Labour.

While we know that some of our vendors purchase goods from foreign countries, we do not know the full extent to where our vendors purchase their goods from. We are also aware that we purchase highly finished goods built with multiple materials and that each material may contain a different risk profile for supply chain risks.





## Goods Procured

For the purposes of assessing risk associated with goods in Highbury's supply chain, we evaluated product categories making up at least 0.5% percent of total procurement spend for fiscal year 2023. Any product categories below 0.5% percent of total procurement are deemed immaterial for this assessment and excluded from the analysis. As a result, the top 38 of Highbury's suppliers — amounting to 80% of total procurement spend, were considered in the risk assessment.

The risk assessment has been conducted of Highbury's goods procured identified inherent risks of forced labour and/or child labour within certain goods or materials from which products are made.

A risk assessment has been conducted on Highbury's primary goods procured, and has identified initial inherent risks of forced labour and/or child labour within the following categories:

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- |              |              |                 |
|--------------|--------------|-----------------|
| • Tomatoes   | • Sunflowers | • Salt          |
| • Glass      | • Beans      | • Pepper        |
| • Iron       | • Onions     | • Chile peppers |
| • Sugarcanes | • Garlic     | • Timber        |
| • Rubber     |              |                 |
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Highbury does not procure all the listed goods directly. For example, when procuring cans and closures, the metal may be derived from steel which is a byproduct of iron. Therefore, Highbury has identified the risks associated with certain materials that are used in the production of finished goods that our company purchases.

Other high-volume goods procured by Highbury include plastic polymers, food additives, bell peppers and parsley. These remaining goods were not directly identified within the two noted indices; therefore, they carry low inherent risk of forced labour and child labour.

## Countries of Procured Goods

For assessing country associated risks of forced labour and/or child labour, Highbury evaluated all suppliers we purchased goods from in fiscal year 2023.

Using the *Walk Free Global Slavery Index* and the *U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour*, we conducted a risk assessment on the countries of operations of our vendors. Our analysis found that all our vendors are from North America. According to both global benchmarks, there is low inherent risk exposure of forced labour and child labour identified since Highbury's vendors are all located in Canada and the United States. This does not mean that forced labour or child labour does not exist in the supply chains of our vendors.

Highbury is aware that some of its vendors have headquarters in foreign countries and that these vendors may procure their goods from other regions or other vendors, but at this time, Highbury does not know the full extent of where all vendors' goods are sourced from.



## Mitigating Activities

To mitigate the risk of child labour and forced labour within our supply chains, Highbury incorporates the following mechanisms for supplier onboarding and monitoring:

### 1. Supplier Onboarding

- a. **Vendor Approval Process:** Highbury's Vendor Approval policy requires all vendors supplying raw materials, ingredients, or packaging materials to go through an internal assessment before being added to the Approved Vendor Registry. This procedure includes an initial assessment that ensures a supplier's compliance with food safety standards. Following the initial assessment there is a Quality Assurance (QA) assessment that reviews any additional requirements for vendors supplying medium-high risk goods. Once approved, the supplier is added to Highbury's Approved Vendors Registry. Though this assessment does not currently incorporate aspects related to this Act, Highbury is considering implementing clauses requiring suppliers to attest to not using child labour or forced labour in their operations or supply chains. In addition to Highbury's internal onboarding process, the vast majority of the spend comes from vendors vetted by Fortune 500 companies that require suppliers to sign a Supplier Code of Conduct that prohibits the use of forced labour and child labour in their operations.
- b. **Supplier Disqualification:** Within the Vendor Approval policy, Highbury lists conditions for which a supplier may be disqualified. This includes discontinuation of material, poor service or quality, lapsed certification, recalls, customer requests and/or other complaints. There is an opportunity for Highbury to add a clause relating to the conditions of the Act, noting that suppliers must comply with Highbury's domestic laws or Highbury can reserve the right to terminate the vendor's agreement.

### 2. Supplier Monitoring

- a. **Ongoing Review:** The Approved Vendor Registry is reviewed monthly to identify suppliers with expired, or soon-to-be expiring documentation/certifications. If certificates are not reissued within 60 days of expiration, a Vendor Quality Notification is used to communicate concerns to suppliers, request corrective action and evaluate supplier performance.
- b. **Annual Reviews:** Highbury's top 80% of suppliers have annual reviews conducted on their performance. This review currently includes discussions on product quality, delivery, and any other stakeholder concerns. There is an opportunity to include questions that meet the conditions of the Act.
- c. **Onsite Visits:** Currently, these visits are conducted ad hoc when experiencing manufacturing or quality-related issues. By directly observing working conditions, Highbury can also assess whether the supplier's practices align with ethical standards.



### 3. Internal Policies

- a. **Policies to mitigate risk of forced labour and child labour:** Despite having no reported instances of forced labour or child labour identified within Highbury's operating activities, Highbury is committed to continually developing internal capabilities and controls that reduce the risk of forced labour and/or child labour within in our supply chain.

## Remediation forced labour & child labour & vulnerable family income loss

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Highbury Canco ("Highbury") is in the process of discovering the full depth of our supply chain and is continuing to review procurement practices to enhance the rigor of our due diligence processes, including raising awareness with suppliers. To date, Highbury has not identified or suspected any instances of forced labour or child labour within our operations or those of our suppliers. Consequently, no remediation measures were required in respect to forced labour or child labour.

## Awareness Training

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Highbury Canco ("Highbury") does not have training in place on the subject of forced labour or child labour. However, of the policies identified above that are relevant to this Act, Highbury does require new employees to review Highbury's Code of Conduct. When onboarding new employees, part of this process includes reviewing the code to ensure the individual understands Highbury's standards and expectations. Sections within the code of conduct that are relevant to the Act include discrimination and harassment, diversity and inclusion, sustainable growth, and confidentiality and anonymity.

Highbury recognizes the opportunity to enhance employee training relevant to this Act, by incorporating training on forced labour and child labour. Highbury will be evaluating applicable trainings for staff in the foreseeable future.

## Assessing Effectiveness

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To track Highbury Canco's ("Highbury") effectiveness of procedures to mitigate the risk of child labour and forced labour, the following mechanisms are in place:

### Highbury Internal Processes

1. **Harassment incidents:** Highbury has a zero-tolerance for discrimination and harassment. All claims made regarding harassment will be reported to Management. Where an investigation is warranted, Highbury will ensure an unbiased, impartial investigation is conducted.





- 2. Conduct and behaviour incidents:** Full compliance with Highbury's Code of Conduct is expected of all employees. As a condition of employment, all new employees must sign a Certificate of Acknowledgement, stating that they have read the Code of Conduct and understand that they are required to comply with outlined conduct and behaviour. In addition, employees may be required to complete and sign an annual certificate confirming that they have complied with the Code. Individuals who do not complete certificates may be subject to disciplinary action.
- 3. Employee training:** Highbury plans to implement employee training on the topic of child labour and forced labour. Content will include how to identify, assess and report perceived or actual instances of child labour and/or forced labour.

### Supplier Activities

- 1. Vendor Approval:** Highbury plans to implement a clause within the Vendor Approval policy regarding a zero-tolerance for child labour and forced labour. This clause aims to identify the outcome or, disciplinary action should any instances of child labour or forced labour be reported or discovered by Highbury.
- 2. Supplier questionnaire:** A phased-in approach will be adopted to have suppliers complete a Supplier Questionnaire which will include specific questions regarding child labour and forced labour. This phased approach will begin with the largest suppliers and continue across the full supply chain within a reasonable time period. For each questionnaire submitted, Highbury will collect responses in a centralized system, to understand how the risk of child labour or forced labour affects suppliers.
- 3. Supplier visits:** When performing onsite supplier visits, Highbury will review an onsite questionnaire which will integrate questions related to forced labour and child labour with which suppliers will be interviewed. Highbury will keep all questionnaires on a centralized workplace where responses can be updated for each visit. Highbury will track responses to understand what suppliers are doing to mitigate the risk of child and forced labour.
- 4. Supplier performance reviews:** Key suppliers of Highbury are reviewed on an annual basis to ensure compliance with contract terms and conditions. These reviews can serve as an opportunity to review findings from site visits and supplier questionnaires. Record keeping for frequency of reviews and date of last review will be kept on a centralized data base to ensure these reviews are being performed.



## Steps Taken to Prevent & Reduce Risk of Forced Labour or Child Labour

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Highbury Canco (“Highbury”) has taken the following steps to prevent and reduce the risk of forced labour or child labour:

1. Conducting an internal risk assessment of forced labour and/or child labour in the organization’s activities and supply chains. Highbury has identified goods within the supply chain that have inherent risks of forced labour and/or child labour in this report.
2. Implementing reporting policies and procedures that create a culture where employees feel safe and capable of reporting instances of forced labour and/or child labour or any other form of suspected exploitation.
3. Addressing practices in our organization’s activities and supply chains that increase the risk of forced labour and child labour: Remediation efforts related to due diligence processes have been identified to reduce the risk of forced labour and/or child labour within the supply chain.
4. Developing due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chains.
5. Implementing anti-forced labour and/or anti-child labour conditions: Highbury has identified the opportunity to integrate conditions within the Vendor Approval policies related to forced labour and child labour.
6. Monitoring suppliers: Highbury uses supplier reviews and onsite visits for key suppliers to monitor supplier relationships. Both functions have been identified as opportunities to align reviews and onsite visits to verify whether suppliers are adhering to labour laws and regulations, specifically in relation to forced labour and child labour.
7. Enacting measures to provide for, or cooperate in, remediation of forced labour and child labour: Mitigating activities have been identified to reduce the risk of forced labour and child labour within supply chains. See risk assessment section for further explanation.
8. Developing and implementing training and awareness materials on forced labour and child labour: Highbury has identified the opportunity to develop employee training relevant to forced labour and child labour in their internal operations.



## Attestation

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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.

Sam Diab

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**Full Name**

**Signature**

President and CEO

May 29, 2024

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**Title**

**Date**

I have the authority to bind Highbury Canco Corporation and this report covers financial year 2023 and applies to Highbury Canco Corporation and all entities considered reporting entities in terms of the Act and any controlling subsidiaries of Highbury Canco Corporation if they apply.