

May 2024

Supply Chains Act - Report

1. Introduction

This report is made on behalf of Howson & Howson Limited ("Howson") and describes the actions taken by Howson during the financial year ending December 31, 2023 to assess, prevent and reduce the risk that forced or child labour is used at any step in its operations and supply chains pursuant to the requirements of section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("Act"). This Report constitutes the first report prepared by Howson under the Act.

2. Structure, Activities and Supply Chains

Howson is a corporation based in Blyth, Ontario.

Management Structure:

- Howson is controlled by its board of directors:
 - President,
 - Secretary/Treasurer,
 - and three Vice-Presidents.
- Operations are managed by:
 - Senior Management team (Consisting of 3 from the Board of Directors),
 - Controller,
 - HR & IT Manager,
 - Quality Control Manager,
 - Flour Mill Superintendent,
 - Head Miller,
 - and Office Manager (QC Assistant).

Howson has full and partial ownership in other supporting corporations, none of which are subject to the reporting obligation under the Act.

Howson is a Flour Mill that specializes in producing flour products produced from Canadian Western Amber Durum Wheat. The primary product manufactured is Durum Semolina which is sold to Howson's customers for use mainly in the manufacture of pasta. Howson has one location in Blyth, Ontario.

As a Flour Mill, Howson is committed to having a supply chain with reputable, and ethical suppliers. These suppliers provide raw materials, enrichments, water treatments, packaging and other materials required in the production of Howson's products.

Suppliers are required to be on Howson's Approved Supplier List. New suppliers must go through a comprehensive evaluation as part of business relationship development. For the evaluation, information is collected from prospective suppliers and recorded on a Supplier Approval/Evaluation Form. Suppliers are rated on Food Safety, Quality Management, ethical sourcing process, and new to 2024 Anti- Forced Labour and Child labour in their businesses and supply chains.

Howson reviews the Approved Supplier List annually and Supplier Approval/Evaluation forms are renewed with current suppliers on a regular basis.

3. Policies and Due Diligence Processes

Howson has the following policies, which collectively work to ensure Force Labour and Child Labour are properly addressed in its business and supply chain.

Company Policies

- Howson & Howson Ltd. Company Policy – Flour Mill Division
- Suppliers of Raw Materials and Packaging
- Supplier Approval/Evaluation Policy (and form)

Hiring / Employment Manual

- Recruitment and Selection Process
- Employment Offer Letter

Employee Handbook

- Equal Opportunity Employer
- Pay Administration
- Payroll Deductions
- Overtime Entitlement and Pay
- Scheduling
- Employees Under 18 Years of Age
- Anti-Forced/Child Labour Policy
- Statutory Benefits
- Statutory Holidays
- Vacation
- Protected Leaves Policy
- Health and Safety Program
- Accommodation Policy

4. Assessment of Forced Labour and Child Labour Risks

Howson is in the process of assessing and managing the risk of forced or child labour in their supply chain.

The aim is to identify and address potential areas that carry the risk of forced or child labour.

5. Remediation Measures

The Company has not identified any instances of forced or child labour in its supply chain, and so no remediation measures have been taken.

6. Remediation of Loss of Income

The Company has not identified any instances where the measures it has implemented to eliminate forced or child labour from its supply chain has led to the loss of income, and so no remediation measures have been taken to address this issue.

7. Training

Howson will be providing training to all employees on human rights including forced and child labour. This training is company-wide and mandatory.

8. Assessing Effectiveness

The Company has not taken any action to assess its effectiveness in addressing risks of forced or child labour in its activities and supply chains.

9. Approval and Attestation

This report has been approved by the Board of Directors of Howson & Howson Limited in accordance with section 11(4)(a) of the Act.

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.

May 29, 2024



Jeffery D Howson

President

I have the authority to bind
Howson & Howson Limited



W F Rick Howson

Secretary/Treasurer

I have the authority to bind
Howson & Howson Limited