



# Hutterian Brethren Church of Riverside

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Forced Labour and Child Labour in Supply Chains Company  
Assessment

**Table of Contents**

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Executive Summary..... 2

Introduction ..... 3

Structure, Activities & Supply Chain..... 3

Policies & Due Diligence Processes..... 5

Supply Chain Risk Assessment..... 5

Remediation of Forced & Child Labour ..... 6

Remediation of Vulnerable Family Income Loss ..... 6

Awareness Training ..... 6

Assessing Effectiveness ..... 7

Steps Taken to Prevent & Reduce Risk of Child Labour or Forced Labour ..... 7

Attestation..... 9

# Executive Summary

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Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced through Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), aim to increase industry awareness and transparency and drive businesses to improve practices. The Act requires entities to report on the steps taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity. There are seven mandatory reporting areas that must be investigated and reported on which include:

- Its structure, activities and supply chains.
- Its policies and due diligence processes in relation to forced labour and child labour.
- The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.
- 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.
- The training provided to employees on forced labour and child labour.
- How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

# Introduction

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This report is Hutterian Brethren Church of Riverside’s response to Bill S-211, An Act to support the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), sections 11(1) and 11(3).

The entities covered by this report include Hutterian Brethren of Church of Riverside (business number: 19349751), Riverside Colony Farming Co. Ltd. (business number: 79560 0261), Riverside Colony Equipment Co. Ltd. (business number: 795602267) and Riverside Planning Col., Ltd. (business number: 836259689).

Hutterian Brethren Church of Riverside controls Riverside Colony Farming Co. Ltd. (“Farming Co.”), Riverside Colony Equipment Co. Ltd. (“Equipment Co.”), and Riverside Colony Planning Co.,. (“Planning Co.”) who collectively have a place of business in Canada, do business in Canada, have assets in Canada and meet both the revenue and asset thresholds – therefore, meeting the definition of an Entity according to this Act.

The financial reporting year of these four entities covered by this report is for the year ending December 31<sup>st</sup>, 2024.

## Structure, Activities & Supply Chain

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### Hutterian Brethren Church of Riverside

Hutterian Brethren Church of Riverside (“the Colony”) is a group of 111 family members. This Colony operates on approximately 13,000 acres of land, 9,500 acres of which is farmable, and for the purposes of this report, their operations involve activities within the agricultural industry.

The Hutterian Brethren Church (“the Church”) was recognized by an Act of Parliament in Canada in 1951. Members of the Church (“Hutterites”) live communally in settlements (“colonies”) and practice an agricultural way of life where all property and assets are held communally for the benefit of all Hutterites. Cultural norms for Hutterites include recognition of adulthood at age 15, and the practice of lifelong education. Hutterite children attend traditional school from age 3-15, after which they participate in vocational training through apprenticeships. With skills learned through their vocational training, Colony members participate in the economic activities of the Colony which could include plumbing, electrical, and farming.

The culture of the Hutterites, as recognized by their faith and codified by an Act of Parliament, is to live communally and share among members which extends to common ownership of property and distribution of income. Each family is provided a house on the Colony and families are financially provided for by the income generated by the economic activities of the Colony.

Hutterites participate in lifelong education that combines traditional and vocational teaching. This is a key pillar of the Church who support their members from “cradle to grave”. Their approach to education is compliant with Canada’s child labour standards.

The following outlines the activities related to the production of or import of goods produced as they relate to the Act stemming from the Colony, Farming Co., Equipment Co., and Planning Co. (the Entities), **Farming Co., Equipment Co., and Planning Co.**

*Structure*

Collectively, the Farming Co., Equipment Co., and Planning Co. operate the farming operations of the Colony. The operations are located at P.O. Box 550, Fort Macleod, AB T0L 0Z.

The individuals working for the Entities are members of the Colony.

*Activities*

Farming Co. operates the main farming operations, which include hay, cropping, canola, barley, wheat, dairy and eggs. Equipment Co. owns the equipment, such as vehicles and trucks, used in the Colony’s farming operations and directly leases the equipment to Farming Co.

Planning Co., owns the feedlot asset however there is no business activity that occurs here.

*Supply Chain*

For the purposes of describing and evaluating the Entities’ supply chain, suppliers who account for at least 1% or more of the total procurement spend over the 2024 fiscal year were reviewed.

The majority of the purchases made of cattle for the feedlot, which account for approximately 66% of the total spend. Given the nature of farming operations, the remaining top purchases include feed purchases (12%), which include corn, barley, premix minerals, salt, and distiller grains and crop purchases (9%) which include chemicals, fertilizers and other seeding supplies. Farming equipment purchases account for 6% of the total spend. Other purchases include

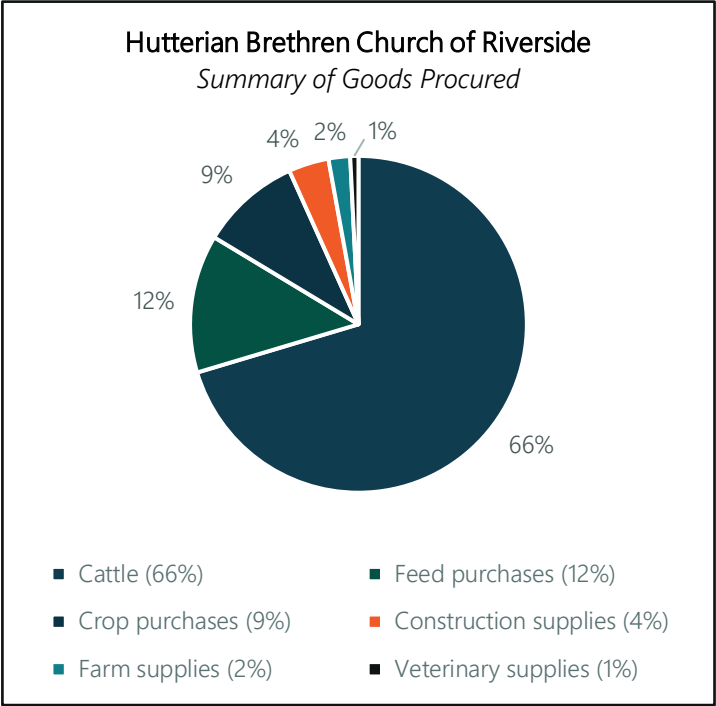


Figure 1: Summary of Goods Procured

construction equipment and supplies (4%) used in the construction of feedlots, kitchen and other projects including paint, concrete and kitchen equipment, general farm supplies (2%) such as, fuel, small equipment, and building supplies and veterinary purchases (1%). All procured goods are from suppliers within Canada. See Figure 1 for a breakdown of these goods.

Planning Co., did not make any purchases of goods during 2024.

The Entities do not have visibility into their supply chain beyond first-tier suppliers therefore, the Entities are continuing to evaluate this to fully understand the origination of goods procured.

## Policies & Due Diligence Processes

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The Entities have informal processes in place relevant to member safety and awareness. Regular safety meetings are held with members to review content related to operations including health and safety. There is a dedicated safety officer that oversees these meetings. The Entities have recently identified the need to implement more formal processes with regard to the safety meetings and discussions. The Hutterite Safety Council (HSC) provides materials and training to safety officers in each Colony and their guidance is implemented and followed at the Entities.

While there is no formal process to select suppliers, the Entities usually visit their suppliers to observe them, and in some cases they enter into contracts with their suppliers. The Entities recognize the need to inquire into their suppliers' processes with regards to the Act.

The Entities recognize that there are limited internal policies and due diligence processes aimed at specifically addressing the risk of child labour and/or forced labour within activities and supply chain. This has been identified as an opportunity that will be considered going forward.

## Supply Chain Risk Assessment

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A risk assessment over the Entities industry of operation, goods procured, and the countries goods are procured from has been performed over material direct suppliers. For the purposes of this report, material suppliers are defined as those who account for at least 1% or more of the total procurement spend during the fiscal year. This risk assessment uses two separate indices to conclude on the inherent risk of child and/or forced labour related to the Entities' industries of operation, goods procured, and countries goods are procured from. The two indices are Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor. As there was no business activity that took place at Planning Co., they are excluded from the analysis below.

### **Industry of Operation**

Farming Co. and Equipment Co. operate within the agriculture industry. The two indices noted above have identified an inherent risk exposure within this industry.

### **Country Which Goods are Procured From**

For the purposes of this assessment, a review of countries which goods are procured from focused on the location of direct supplier's operations. Each direct material supplier of Farming Co. and Equipment Co. is located within Canada has been identified as having a low-risk exposure to forced and/or child labour.

### **Goods Procured – Farming Co.**

As described in the previous section, the goods procured within Farming Co.'s supply chain are divided into the categories of crop, cattle, feedlot and general farm purchases. A risk assessment over goods within these categories has been conducted and identified an initial inherent risk of forced and/or child

labour within the following categories:

1. Crop: Cereal grain, wheat, hay, canola.
2. Feedlot: Corn; and
3. Cattle: Beef.

All other remaining goods were not identified within the two indices, therefore concluding a low-inherent risk exists.

### **Goods Procured – Equipment Co.**

As described in the previous section, the goods procured within Equipment Co.'s supply chain include farming equipment trucks and vehicles. These goods were not identified within the two indices, therefore concluding a low-inherent risk exists.

## **Remediation of Forced & Child Labour**

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To mitigate the risk of child labour and forced labour within supply chains, the Entities have acknowledged the need to develop and enhance existing due diligence mechanisms in relation to this Act. The Entities understand the value of discussing these risks with vendors. These conversations will bring awareness to this issue in an effort to remediate the risk within their supply chains.

## **Remediation of Vulnerable Family Income Loss**

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The Entities are in the process of understanding and evaluating their supply chains related to the risk of child labour and forced labour. To date, the Entities have not identified instances of the use of child labour or forced labour within their operations or those of suppliers. The Entities have noted that they have had discussions with some of their suppliers who have also stated that they will be filing reports related to the Act. The Entities will continue to review procurement practices to enhance the rigor of due diligence processes including raising awareness with suppliers.

## **Awareness Training**

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The Entities launched an initiative to train five employees on Canada's Law to Fight Child & Forced Labour. Two members were identified to complete the training, which include the Secretary/General Manager and the Vice-President. They were selected as they are part of the leadership that oversee all operations and will provide the awareness to the remaining members. The training was designated as mandatory. The employees have completed the training and answered questions associated with the course content. Participants who completed the e-learning session are able to:

- Define modern slavery
- Explain child labour and forced labour
- Understand key reporting requirements in Canada under Canada's law *Fighting Against Forced Labour & Child Labour in Supply Chains*

- Identify goods and countries at risk of forced or child labour in their supply chains
- Recognize ways to identify risks of forced or child labour
- Implement mechanisms, such as due diligence strategies, to combat forced and child labour
- Recognize the warning signs of child or forced labour

The course is delivered online in an interactive format where participants validate their learning by answers questions and reviewing case studies. It takes approximately 60 minutes to complete.

Other relevant training that is provided to members include CPR training certifications, and job specific safety training. Additionally, a few members obtained their forklift/heavy machinery certifications who will then provide formal training to other members of the crew.

## Assessing Effectiveness

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To mitigate the risk of child labour and forced labour, the following mechanisms are in place relevant to assessing effectiveness:

1. Worker safety: Regular safety meetings are conducted with all members to emphasize the importance of the topic at the Entities and are considering formalizing these safety meetings by requiring members to sign in and out. Additionally, they have members certified in CPR, and safety training, as well as heavy equipment certifications that will be training other members.
2. Reporting mechanism: The Entities provide members the opportunity to bring any issues or concerns forward at the daily board of directors' meetings.
3. Suppliers: The Entities have noted that they have had discussions with some of their suppliers who have also stated that they will be filing reports related to the Act.

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

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The Entities have taken the following steps to prevent and reduce the risk of child labour or forced labour within their activities and supply chain:

1. Mapping activities: As part of this report, the Entities have mapped their activities to complete an initial risk assessment to align with the Act.
2. Mapping supply chains: As part of this report, the Entities have mapped their supply chains to complete an initial risk assessment to align with the Act.
3. Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains: As part of this report, the Entities have identified risks within their activities and supply chains that have inherent risks of child labour and/or forced labour.
4. Developing and implementing 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: The Entities have identified that there are limited policies and processes in place and have identified the need to enhance this going forward.

5. Developing and implementing training and awareness materials on forced labour and/or child labour: The Entities have begun training key employees on the issue of modern slavery in supply chains. The Entities will continue to assess the need for additional training.
6. Developing and implementing procedures to track performance in addressing forced labour and/or child labour: The Entities engage with other farmers and through the Hutterite Safety Council and take guidance from them on safety at the colonies. Additionally, the Entities noted that they will continue to seek expert advice related to the Act.

# 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 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.

Jeremy Tschetter

Full Name

  
Signature

Secretary

Title

May 28, 2025

Date

I have the authority to bind Hutterian Brethren Church of Riverside and all Hutterian Brethren Church of Riverside owned legal entities including Riverside Colony Farming Co. Ltd., Riverside Colony Equipment Co. Ltd. and Riverside Planning Co. Ltd.