

WHITE LAKE COLONY

BOX 150

NOBLEFORD, AB

TOL 1S0

Introduction

The Hutterian Brethren Church of White Lake is committed to ensuring and enabling ethical and compliant practices across its supply chain. Located in Nobleford, Alberta, we have been deeply involved in sustainable agriculture and manufacturing since establishing our roots in the mid-1970s.

Our organization aims to operate in a community-based approach and contributing to our local, national, and international economies. We continue to uphold and ensure compliance with the relevant laws and regulations in the regions we operate in. We are focused on working with suppliers and vendors who operate at the highest standards in an effort to mitigate the risks associated with forced labour and child labour.

This document is a report prepared by Hutterian Brethren Church of White Lake (“White Lake Colony”) in adherence to Section 11 of Bill S-211 (“the Act”). It outlines the measures that the White Lake Colony has taken in the last fiscal year to prevent and reduce the risks of forced labour and child labour being used in our activities and supply chains for the January 1st - December 31st, 2023, fiscal year.

Section A: Structure, Activities and Supply Chains

White Lake Colony is a privately owned corporation in the southern region of Alberta, Canada in Nobleford. The organization primarily focuses on agriculture and manufacturing. Our beliefs and values have allowed us to provide our community members with the opportunity to develop numerous manufacturing, agricultural and farming skills, which has translated to developing more knowledge of our production process and in turn our supply chain requirements.

For the purposes of the Act, White Lake Colony has assets in Canada, has a place of business in Canada, and does business in Canada. For the previous fiscal year, White Lake Colony satisfied the asset and revenue thresholds and hence is an entity. Additionally, White Lake Colony is a reporting entity as it produces goods in Canada.

White Lake Colony aims to provide its customers with locally produced goods that stem from having a strong supply chain. Our supply chain primarily consists of purchasing input products from vendors in Canada and in the United States, which includes but is not limited to, feed, grain, fertilizers, and livestock purchases. By working together with our vendors and suppliers, we are able to conscientiously produce the highest quality goods and reduce the risks associated with forced labour and child labour.

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Section B: Policies and Due Diligence Processes

Over the course of the past fiscal year, White Lake Colony has not conducted any analyses relating to its supply chain relating to forced labour and child labour. However, as all of our suppliers are located in Canada and the United States, we understand there may be a lower risk attributed to forced labour and child labour in our supply chain and have therefore not developed any policies or due diligence processes relating to forced labour and child labour.

We recognize the necessity to uphold a transparent supply chain and are exploring the development of a Supplier Code of Conduct, should a material change occur with our supplier and vendor purchasing activities, including supplier location and product type.

Section C: Forced Labour and Child Labour Risks

During the prior fiscal year, White Lake Colony did not perform a formalized risk assessment relating to forced labour or child labour within our supply chain. However, in May of 2024, we completed a high-level risk assessment focused on identifying areas of risk and concern where these labour risks may arise and exist.

It should be noted that through this assessment we are not indicating that the use of forced labour and child labour exists within our supply chain, but rather was undertaken to understand our current risks and to support the development of this report. In addition, we utilized this high-level assessment to pinpoint areas of policy development or changes in our vendor purchasing program over the coming year, should we encounter any identified risks.

Our methodology consisted of mapping our supplier spend by type and geographical location against the Walk Free Global Slavery Index and the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor. The Walk Free Global Slavery Index provides information and data points towards the prevalence of modern slavery whereas the Department of Labor's List of Goods Produced by Child Labor or Forced Labor identifies risks linked to specific goods and their corresponding geographical locations.

Risk Assessment Findings

With the analysis we conducted, we noted that over 99% of our supplier spend was in Canada and less than 1% was in the United States. These two countries have a prevalence score of 1.8 and 3.3 estimated number of people in modern slavery per 1,000 population per the Walk Free Global Slavery Index for Canada and the United States, respectively. We also completed a cross-reference against the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor and did not identify any imported products that are subject to the risk of being associated with forced labour and child labour.

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Our findings indicate that the overall risk within our supply chain for forced labour and child labour is low.

While our current risk assessment indicates a low risk rating, we will continue to be vigilant and monitor any changing conditions as it relates to the vendors and suppliers we work with and the regions we source from.

Section D: Remediation Measures

During the past fiscal year, we have not identified any forced labour or child labour in our activities and supply chain. As such, we have not had to remediate any forced labour or child labour.

Should any risk factors be identified in our activities or in our supply chain in the future, we will explore the options available to us and respond in a timely manner and undertake the necessary remediation measures, if required.

Section E: Remediation of Loss of Income

Over the course of the prior fiscal year, we have not identified forced labour or child labour used in our activities and supply chains. Therefore, we have not had to remediate a loss of income associated with these issues.

Should we identify any risks in the future, relating to forced labour and child labour in our activities and supply chains, we will explore the available options and implement the necessary remediation measures to manage any loss of income for vulnerable families. This proactive measure ensures we are aware and aligned as an organization should any supply chain risks arise relating to forced and child labour.

Section F: Training

We currently do not provide any training to our community members on forced labour and child labour as our preliminary assessments have not identified these risks within our supply chain and activities.

Should we identify the need to provide training to our community members in the future, due to changing risk levels, we will explore the available options to develop training modules relating to forced labour and child labour.

Section G: Assessing Effectiveness

From the analysis we conducted, we have identified that the risk of forced labour and child labour is low in our supply chain and activities and have not developed a formalized mechanism to assess the effectiveness in preventing these risks over the prior fiscal year.

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Should our risk assessment change, we will explore the opportunity to create a process to review the effectiveness of our evaluations and to develop the necessary policies and procedures, should there be an increase in our risk assessment.

Conclusion

White Lake Colony will continue to work diligently with its suppliers and vendors to ensure that we maintain a transparent supply chain; and to continue to work with suppliers and vendors who maintain the same values we have as a community and organization. We will continue to work with other organizations to continue to support eliminating forced labour and child labour.

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Attestation

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.

X David Hofer

Full Name

X Secretary

Title

X 05-30-2024

Date

X David Hofer

Signature*

I have the authority to bind the Hutterian Brethren Church of White Lake