



FORCED LABOUR
AND CHILD LABOUR
ANNUAL REPORT
2024

INTRODUCTION

As a leading hatchery solution provider with operations in Canada and UK and warehouses in US, UK, Malaysia and China, Jamesway Chick Master Incubator Inc. (Jamesway) plays a role in promoting human rights and responsible business practices. We recognize that risks of forced labour and child labour (also referred to as modern slavery) exist and acknowledge that understanding and managing these risks requires a collaborative approach with our suppliers, our workforce and other external stakeholders.

This report (the Report) outlines Jamesway’s governance processes, existing measures, and progress made in the 2023 fiscal year to prevent and mitigate the risks of modern slavery across the supply chain we utilize.

REPORTING CONTEXT

Jamesway, incorporated in the Province of Ontario, is subject to the legal requirements in section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act). For purposes of the Act, the reporting entities covered in this Report include functions, major projects, and assets that have been wholly-owned and/or operated by Jamesway from January 1st to December 31st, 2023 that qualify as entities under the Act. The terms “Jamesway”, “we”, “our”, and “the Company” refer to Jamesway.



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OUR STRUCTURE, BUSINESSES AND SUPPLY CHAIN

OUR CORPORATE STRUCTURE AND BUSINESS ACTIVITIES

Jamesway is headquartered in Cambridge, Ontario and operates in three core businesses – Incubator & HVAC Equipment, Hatchery solutions and after installation support and parts. We’re a team of more than 250+ problem solvers with the goal to help provide the poultry industry with cost effective, easy to use incubation equipment. We are known for being reliable, efficient and offering the best long-term return on investment. We aspire to make poultry protein accessible and affordable globally. Jamesway proudly provides equipment to the top international poultry companies. We have over 2,500 customers in over 150 countries.

Jamesway has centralized corporate and administrative functions that provide governance, finance, procurement and other support to all of Jamesway’s core businesses. We have the drive to do things right. We are determined to meet our commitments, ethically, socially and professionally.

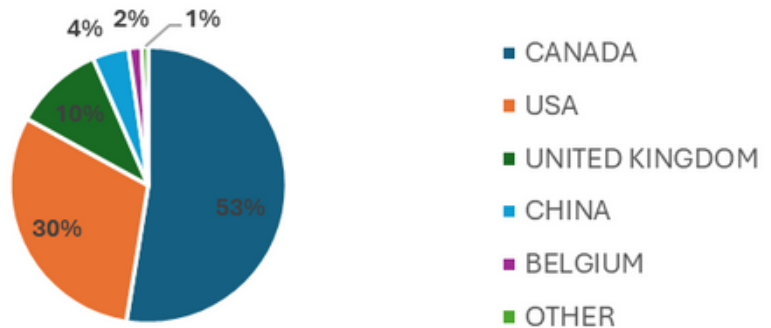
OUR SUPPLY CHAIN

Our centralized procurement team is headquartered in Cambridge, Ontario, Canada and sources materials, products, and services for our manufacturing plant and fulfilment centers. We do business with a wide range of suppliers, sourcing material both domestically and internationally.

In 2023, the largest categories of goods and services purchased by our procurement team included:

- Foam and Fibreglass Reinforced Plastic (FRP)
- Aluminum Extrusion
- Cold Rolled and Hot Rolled Steel
- Copper
- Control Panel Electrical Components
- Polypropylene Plastic
- Outside Services – Galvanizing, Zinc Plating, and Painting

2023 SUPPLY VALUE % BY COUNTRY (TIER 1 SUPPLIERS)





OUR POLICIES AND DUE DILIGENCE PROCESSES

GOVERNANCE AND RESPONSIBILITIES

In 2024 the company has implemented a risk management program to systematically monitor and report on material supply risks. This includes a risk assessment and risk-based audits as required. When an emerging risk is identified, it is escalated to Senior Management to examine its implications and review findings to rectify issues where necessary.

POLICIES AND STANDARDS

Business Ethics (Policy and Commitment on Human Rights)

The Jamesway Forced Labour and Child Labour Policy, along with mandatory training, applies to all Jamesway entities listed in this report. The Policy reinforces the company's requirements and expectations for conducting business. It reiterates our stance against the use of forced labour and child labour, ensuring such practices are not present in our supply chain. Jamesway adopts human rights best practices in line with the International Bill of Human Rights and the core International Labour Organization Conventions.

The Policy applies to all applicable employees of Jamesway as defined in our policy and its wholly owned subsidiaries in all countries where we operate. The policy is reviewed annually, and these expectations are reinforced throughout our supply chain.

Expectations on Reporting Violations

At Jamesway, we report (and encourage reporting of) actual or potential non-compliance to our policies or legal requirements, including those related to forced labour and child labour. Personnel are required to report any actual or suspected violation of policies, including those concerning forced labour and child labour, as well as all health, safety, and environment-related hazards or incidents.

We take every report seriously and provide immunity from disciplinary action for good faith reporting of incidents and issues. We will not tolerate any form of retaliation against individuals who report violations of this policy in good faith.





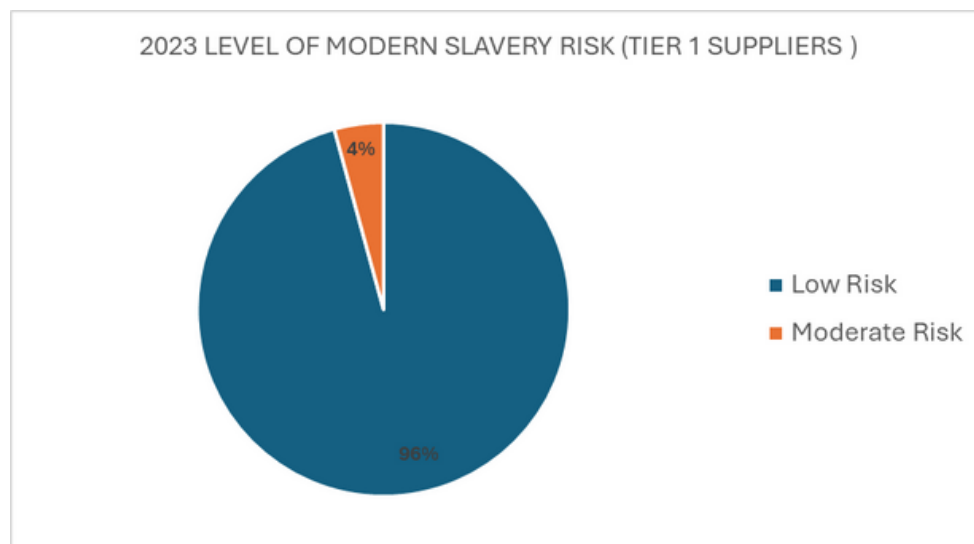
MODERN SLAVERY RISKS

RISK ASSESSMENT AND IDENTIFICATION

To identify the overall risks of forced labour and child labour in our supply chain, we conducted a supply chain mapping exercise in 2023. During this assessment we mapped the countries we source from and the specific products we buy from each country. We assessed the risks from two perspectives – country level and product level within each country.

We used “Walk Free Global Slavery Index (GSI)” to assess modern slavery risk level of the countries we supply from and “US Department of Labor List of Goods Produced by Child Labour or Forced Labour” to assess modern slavery risk level of the specific products we purchase and use in our manufacturing facility.

After careful review, we concluded that we are not buying any high-risk products and most of our suppliers are in low-risk countries.





OUR ACTIONS TO ADDRESS MODERN SLAVERY

SUPPLIER REGISTRATION & RISK CLASSIFICATION

Jamesway employs a risk-based model to manage modern slavery risks in our supply chain. We use various processes to screen and monitor suppliers and our global supply chain for human rights risks, including forced labour and child labour. These processes and actions apply to all entities listed in this report.

Our Procurement team will utilize a supplier management tool (SMT) to qualify and monitor our supplier base. Upon entry into the SMT, a questionnaire is sent to suppliers to determine their risk profile, including their exposure to corruption, forced labour and child labour, and anti-bribery and corruption (ABC). The questionnaire also requests information on whether suppliers have policies and processes specifically addressing forced labour and child labour.

For suppliers that meet a residual risk exposure level for activities connected to child and forced labour based on their questionnaire answers and third-party screening searches, Jamesway follows up with further requests for information and escalates to senior management, where appropriate. Additional requirements or actions could include:

- Enhanced contractual terms
- Supplier certifications
- Third-party inspections in the local jurisdiction
- Termination of the relationship



REMEDIATION MEASURES

Since we have not identified any forced labour or child labour in our business activities and supply chains, we have not taken any remediation measures.

OUR TRAINING & AWARENESS

Upholding human rights, including the prevention of forced labour and child labour, is a key focus at Jamesway. Our employees in Senior Leadership, Procurement, Human Resources and Finance will be trained to understand their role in combating forced labour and child labour within supply chains, ensuring compliance with S-211, and promoting ethical business practices.

Contractors will be provided with our policies and training presentation to reinforce our expectations and raise awareness of human rights topics. This framework underscores our commitment to fostering a culture that not only understands but actively champions human rights across all aspects of our operations and supply chain.

ASSESSING EFFECTIVENESS

During 2023, our focus was mapping our supply chain and identifying our supply chain risk with respect to forced labour and child labour. We haven't assessed effectiveness of our process in 2023.

NEXT STEPS

We created a forced labour/child labour survey and will send to our direct suppliers to certify that all materials incorporated into our final product were sourced, processed, and manufactured in compliance with the forced labour, child labour, slavery, and human trafficking laws of the country or countries in which they operate.

We will continue evaluating our suppliers and will conduct risk-based unannounced audits as needed. This program only applies to high-risk suppliers (if any).

LONGER TERM

Addressing and eradicating forced and child labour in the global supply chain is a multifaceted issue encompassing social, economic, and governance challenges. We aim to deepen our relationships with these partners, enhance our contractual language at the Tier 1 supplier level, and work together to foster new levels of transparency throughout all tiers of our supply chain, building joint solutions that deliver value across multiple dimensions.

As part of our ongoing improvements, we will continue to identify emerging risks. The company is dedicated to further developing and implementing additional due diligence policies and processes to identify, address, and prohibit the use of forced labour and child labour in our activities and supply chain.

REPORT APPROVAL AND 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.

I have the authority to bind Jamesway Chick Master Incubator Inc.



Denis Kan
President & CEO
Dated: May 29th, 2024



MORE **ABOUT US**



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