

## BILL S-211

Bill S-211 is an act that is part of the Fighting Against Forced Labour and Child Labour in Supply Chains Acts, which together form the Canada Modern Slavery Act. This bill was also designed to amend the Customs Tariff.

### **Modern Slavery Statement for the Fiscal Year September 1, 2023, ending August 31, 2024.**

This statement is made pursuant to 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. This statement outlines the approach and initiatives by La Coopérative Agricole d'Embrun Ltée ("Embrun Co-op") to identify and address the risks of forced labour and child labour in its business operations and supply chains during the fiscal year commencing September 1, 2023, and ending August 31, 2024. This is the initial filing for Embrun Co-op to ensure compliance with Bill S-211.

Embrun Co-op is committed to respecting human rights and working towards ensuring our supply chain is free from forced labour and child labour.

### **Company Structure**

Embrun Co-op was established in January 1944. It does business under the business name of La Coopérative Agricole d'Embrun Ltée with its head office in Embrun, Ontario.

The company is owned 100% by its members (3,500), each member owning one share. It operates with a board of directors elected at the Annual General Meeting.

The company operation encompasses crop inputs, crop custom application, livestock feed, fuel and propane and retail stores. These seven divisions; Crops, Grain Elevators, Feed, Agtrek, Energy, RONA and the Your Independent Grocer, have become the foundation of Embrun Co-op. Each division has its own manager who is then overseen by the General Manager.

### **Supply Chain**

Our supply chain encompasses many products across the company. Agronomy products are sourced through a main supplier. Our procurement of energy and propane is also sourced through two main suppliers. Our feed division purchases products through several national suppliers. The majority of our retail products are purchased through two main suppliers in Canada.

Our suppliers are purchasing the products from many countries globally.

## **Risks in Supply Chain**

Our company is committed to respecting human rights and will work towards ensuring that forced labour and child labour is not a part of any product within our supply chain.

## **Actions Taken**

Our company is committed to developing and conducting an internal assessment of risks of forced labour and/or child labour in our organization's activities and supply chains.

Our company is committed to developing and implementing due diligence policies and process for identifying, addressing and prohibiting the use of forced labour and/or child labour in our organization's activities and supply chains.

As this is our initial reporting on our supply chain in response to Bill S-211 requirements, we do not have information available for this reporting period. Our organization is committed to developing procedures and policy in order that we can monitor our suppliers, enacting measures requiring our suppliers to have in place policy and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and their supply chains. Present the annual report to all company management and employees.

## **Risk Assessment**

Our company has begun the process of communicating with our suppliers to confirm that they do not distribute goods and services that support or condone child labour or forced labour in Canadian or International supply chains. The process will include developing a questionnaire for all suppliers to attest to their compliance with these expectations.

Our company is communicating with partners in the industry to work together to develop steps going forward to identify risks within our supply chain.

Our company is developing policy and procedure for our management and employees to learn about, identify and follow company policy on the use of forced labour and/or child labour in our supply chains.

## **Remediation**

Embrun Co-op recognizes the responsibility that we share with our suppliers to provide remedy and guard against forced and child labour. Successful remediation is not easy to achieve and requires a victim-led, consultative, and multi-stakeholder approach.

1. Definition of a complaint: A complaint is a report of a violation that has occurred in our supply chain and internal business and has a direct adverse human rights

impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

2. Designing a remediation procedure: Embrun Co-op recognizes that it is important to identify and establish a remediation team to develop the business's remediation procedure. This should be made up of representatives from the workforce, managers, and organizations with expertise in forced and child labour where available. If there is an existing government or organization, process or project providing remedy for victims of forced and child labour, these should be identified and involved in the development of the remediation procedure. Protecting the victim of forced and child labour must be the priority of the remediation program. The remediation team must seek to understand the specific needs, circumstances, and aspirations of each victim and what it was that pushed them into forced or child labour.
3. Dealing with a case of forced labour and/or child labour: Conduct an initial assessment of the allegations to ensure there is sufficient information to understand the exploitation discovered and remedy it. Ascertain if a supplier or labour provider is implicated. Report the allegations to relevant authorities.
4. Ongoing support and monitoring: Evaluating how effective the remediation procedure was and amending it accordingly. Reviewing internal policies and procedures to determine what needs to change to prevent forced and child labour from re-occurring.

### Training

Embrun Co-op is developing a training policy including knowledge of forced labour and/or child labour, identifying the risks within our supply chain, and remediation policy and procedure.

This training policy would include review of policy on an annual basis and may include seminars and awareness campaigns.

### Effectiveness Assessment

Once we have had our training and policy developed, we would include the number of employees trained each year. We would develop awareness campaigns and seminars that employees attended.

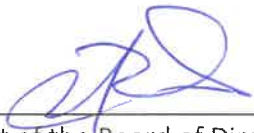
We would also record how many suppliers we have communicated with to confirm supply chain policy and record questionnaires and investigation/audits of any suppliers.

**Sign off**

This report has been presented to our company's board of directors and approved.

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending 08/31/2024. It has been issued on behalf of La Coopérative Agricole d'Embrun Ltée and approved by its board of directors.

Signed,



\_\_\_\_\_  
President of the Board of Directors



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Secretary of the Board of Directors

May 29, 2024  
Date

May 29, 2024  
Date