



# **MAPLE LEAF FOODS INC.**

Report Pursuant to the Fighting Against  
Forced Labour and Child Labour  
in Supply Chains Act ("Modern Slavery Act")

Fiscal Year 2023

## 1. Introduction

At Maple Leaf Foods, we are united behind a shared purpose – to Raise the Good in Food. This spans across all areas of the business, including our deep commitment to sustainability, animal care, food security, and building a diverse, equitable and inclusive workforce. Part of this purposeful vision includes protecting and advancing social responsibility, compliance and human rights within our operations and supply chain.

Forced labour and child labour are contrary to our Purpose, Vision and Values. We do not tolerate forced labour or child labour in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect our directors, officers, team members, suppliers and subsidiaries to act with integrity and comply with the laws, regulations and rules that apply to Maple Leaf Foods in the jurisdictions where we operate. If instances arise where these expectations are not met, we will respond in an appropriate manner.

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a report for Maple Leaf Foods Inc. and its subsidiaries which have an obligation to publish a report under the Act (collectively, “Maple Leaf Foods” or the “Company”). This report refers to the 2023 fiscal year end.

## 2. Steps taken to prevent and reduce risks of forced labour and child labour

Protecting and advancing human rights is fundamental to our values, this includes a commitment to freedom of association and freely chosen employment. We do not tolerate any form of modern slavery, forced labour or child labour in our operations or supply chain. As an industry leader, we recognize our responsibility to protect these values and to ensure that we are preventing and addressing these risks within our operations and supply chain that may arise. We expect our business partners and suppliers to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

In 2023, MLF has taken the following steps to prevent and reduce the risk that forced labour or child labour is used within our own operations and within our supply chain.

- Annual review of the terms of the Code of Business Conduct with updates communicated to team members
- Annual compliance certification for the Code of Business Conduct by salaried team members
- Annual review of the terms of the Supplier Code of Conduct
- Annual Supplier Code of Conduct compliance certification process with approximately 450 suppliers
- Linking our commercial activities with suppliers to our Supplier Code of Conduct
- Ongoing values training for salaried team members
- Rolling out “The Way We Work” to frontline team members
- Enforcing our long-standing policies and processes designed to prevent forced labour and child labour, including validating age of employment eligibility, ID verification, labour hours overtime tracking and respect in the workplace, as well as our robust occupational health and safety policies and procedures
- Promoting the availability of the EthicsLine for team members and suppliers for confidential reporting
- Coordinating various social compliance audits at our largest production facilities
- Engaging with our Unions who represent a majority of our workforce

- Completing workforce audits of certain suppliers
- Implementing an Occupational Health and Safety Internal Audit Strategy and establishing an internal audit subject matter expert team
- Initiating work on a refreshed social compliance due diligence program with dedicated resources
- Engaging an independent third party to conduct a human rights impact assessment related to temporary foreign workers (to be concluded in 2024)
- Publishing our first Integrated Report in May 2023 (reporting on 2022 performance), which includes disclosure related to our social compliance performance

### 3. Structure, activities and supply chain

#### **Structure**

Maple Leaf Foods has a vision to be the most sustainable protein company on earth, responsibly producing food products under leading brands including Maple Leaf®, Maple Leaf Prime®, Maple Leaf Natural Selections®, Schneiders®, Schneiders® Country Naturals®, Mina®, Greenfield Natural Meat Co.®, Lightlife® and Field Roast™. We employ approximately 13,500 people, of which approximately 8,000 are covered by collective agreements. Our operations are primarily in Canada, and we have three facilities and an Innovation Centre in the United States. We also have small representative or sales offices in Japan, South Korea, Philippines and China. The Company is headquartered in Mississauga, Ontario and its shares trade on the Toronto Stock Exchange (MFI).

#### **Activities and Supply Chain**

From an operational perspective, we have a combination of agricultural operations (pork and poultry), primary food processing facilities and further prepared foods processing facilities. We sell the food we manufacture through retail, food service and industrial channels. We rely on many suppliers for our animals, ingredients, indirect goods and services. Our supply chain involves purchasing a broad range of goods and services, largely from Canadian and North American sources.

We are deeply committed to the highest standards of respect and integrity in our business relationships and activities. These standards apply within our organization and our expectations of our suppliers and contractors. We follow a fair sourcing process whenever possible while managing our supply chain effectively, and we identify, assess and monitor areas in our supply chain where there may be a risk of forced labour or child labour.

### 4. Policies and due diligence processes in relation to forced labour and child labour

We believe that good governance is the essential foundation of a respectful and inclusive corporate culture that earns trust from and builds value for all our stakeholders. We also recognize that respecting human rights is a shared responsibility of all enterprises regardless of where they operate globally. This perspective aligns with our Purpose, Vision and Values and has long been reflected in our policies and practices.

#### **Code of Business Conduct and Culture**

Our Values and Code of Business Conduct guide us and set expectations for our behaviour and decision-making. Our Code of Business Conduct lays the foundation for how we work together in a respectful, transparent and fair environment. Maple Leaf Foods is committed to the highest

standards of ethical, moral and legal business conduct. Our Code of Business Conduct establishes a roadmap for our expectations around ethical conduct and reporting concerns, including compliance with all applicable laws and regulations. Maple Leaf Foods will not condone the activities of any of our team members who violate the law or engages in unethical business practices, including forced labour and child labour.

We require and expect actual or possible violations of our Code of Business Conduct provisions with respect to human rights to be reported, and we take appropriate action to review and address any issues. Concerns may be escalated through management, or through our EthicsLine, a confidential reporting concerns hotline that is managed by a third-party service provider. The Human Resources and Compensation Committee receives regular reports on culture and conduct matters, including reports to our EthicsLine and violations of our Code of Business Conduct.

To build and maintain the trust of our stakeholders, the board and our executive management team establish the tone from the top, set the standard of conduct and champion our Values. We have established onboarding and training programs that reinforce our Values, including promoting a culture of “Doing What’s Right”, which is one of our eight Values.

### ***Supplier Code of Conduct***

Our Supplier Code of Conduct is embedded into all our purchase orders and contract templates. Our suppliers are obligated to uphold human rights of workers and to treat them with dignity and respect in accordance with recognized international labour standards. This applies to all workers, including temporary, migrant, student, contract, direct employees and any other type of workers. We expect our suppliers to make the following commitments in their labour practices by having controls in place that:

- Ensure that employment is freely chosen and forced, bonded, indenture or trafficking employment shall not be used
- Prohibit child labour in any circumstance
- Working hours will comply with local laws
- Compensation paid to workers shall comply with all applicable wage laws
- Commit to a workplace free of harassment, violence and discrimination
- Allow for the freedom of association

Our Supplier Code of Conduct requires that all business providing goods or services to Maple Leaf Foods must in turn apply those standards to its own supply chain and subcontractors, including providers of contract labour and services.

Further, under our Supplier Code of Conduct, Maple Leaf Foods encourages Suppliers to go beyond mere legal compliance, drawing upon internationally recognized standards if more demanding, in order to advance social and environmental responsibility and business ethics. In no case can complying with the Code violate local laws. If, however, there are differing standards between the Maple Leaf Foods’ Supplier Code of Conduct and local law, we expect Suppliers to meet the more demanding of the two requirements.

### ***Additional Policies and Frameworks***

Maple Leaf Foods has a host of human resources policies and procedures, as well as a robust occupational health and safety framework which support its social compliance efforts. Our policies meet or exceed applicable local and national laws where we operate, they are grounded in our Values and ethical standards, and informed by recommended international principles, such as the

United Nations' Guiding Principles on Business and Human Rights and International Labour Organization Conventions.

## 5. Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

Maple Leaf Foods recognizes that some elements of our supply chain present a risk of forced labour or child labour. The ways we identify and manage this risk include:

- Applying our Code of Business Conduct and Supplier Code of Conduct
- Enforcing our purchasing, human resources and occupational health and safety policies
- Engaging with our team members, Unions, suppliers, customers and other stakeholders as a way of identifying risk or non-compliance
- Completing reviews of supplier operations and practices as part of our supplier assessment program prior to supplier selection
- Incorporating audit rights into our contract templates and in some circumstances, incorporating special terms and conditions in areas seen as being potentially higher risk, including areas with a higher contingent workforce
- Conducting social compliance risk assessments and reviews
- Requiring potential violations of our Code of Business Conduct or Supplier Code of Conduct to be reported
- Offering a confidential, anonymous EthicsLine for reporting concerns which is managed by a third-party agent, investigating concerns that are raised and actioning the outcomes from the investigations as appropriate
- Updating our sustainability materiality assessment, which included a social compliance risk component
- Interviews with a cross section of internal stakeholders as part of an enterprise risk management project lead by the Corporate Project Management Office

In 2023, we completed social compliance audits at our 5 largest facilities. With the establishment of an enhanced social compliance program which started in 2023, we will be moving forward with a broader social compliance risk assessment, which includes forced labour and child labour, and we will be completing a human rights impact assessment with respect to our participation in temporary foreign work programs. This will help us continue to improve our policies and processes, as needed, and prioritize our ongoing efforts as we strive to avoid contributing to adverse human rights impacts through our own business activities and aiming to prevent and mitigate adverse impacts to which we may become directly linked through our supply chain.

If we identify a compliance issue, including but not limited to, child labour, forced labour or life-threatening health and safety situations, we may, as appropriate, suspend our relationship with those suppliers, work with them to determine whether satisfactory remediation of the compliance issue is possible and/or terminate relationships with suppliers who are unable or unwilling to remediate non-compliance.

## 6. Any measures taken to remediate any forced labour or child labour

To date, there have been no identified or reported instances of forced labour or child labour in our activities and supply chain.

7. Remediation of 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

To date there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

8. Training provided to employees on forced labour and child labour

Understanding and complying with the Code of Business Conduct is a requirement at Maple Leaf Foods. Our onboarding programs for our salaried team members include training on our Code of Business Conduct, our Values, and a number of supporting human resource and safety policies. We require these team members to review and sign off on our Code of Business Conduct annually and have a range of values training programs. In addition, in 2023, we rolled out “The Way We Work”, our business conduct and Values training program for our frontline team members.

We also require our suppliers to review our Supplier Code of Conduct, which is widely published and incorporated into our purchase orders and contract templates. Suppliers are expected to certify their compliance with the Supplier Code of Conduct annually and to report any non-compliances promptly.

As part of our plans to advance our Social Compliance program in 2024, we are planning to further integrate training for our team members and suppliers on our position against forced labour and child labour.

9. Effectiveness assessments to ensure that forced labour and child labour are not being used in its business and supply chains

To reduce and prevent the risk of forced labour and child labour within our operations and supply chain, we assess the effectiveness of our actions.

Activity	Measuring Effectiveness
<b>Governance</b>	Human Resources and Compensation Committee of the Board receives quarterly ethics reporting and Safety and Sustainability Committee of the Board receives quarterly occupational health and safety reporting  Robust occupational health and safety leadership and reporting framework with a new dedicated resource for social compliance starting in 2023  Annual content review of the Code of Business Conduct and Supplier Code of Conduct  Annual required sign-off by salaried team members on the Code of Business Conduct  Values training and certification program for salaried team members  Training and participation in “The Way We Work” program for frontline team members  Required adherence by suppliers to the Supplier Code of Conduct, supported by a compliance certification process with approximately 450 suppliers  Supplier screening and assessment as part of onboarding new suppliers
<b>Engagement</b>	Engage with our customers and suppliers on social compliance matters within our network and our supply chain to share standards and best practices

<b>Risk Management</b>	Sustainability materiality assessments refreshed periodically to reach a broad cross section of stakeholders to assist in identification of potential social compliance issues Include in the enterprise risk assessment processes initiated by the Corporate Project Management Office Ethics compliance and reporting concerns processes
<b>Monitoring</b>	Supplier screening Social Compliance Due Diligence Assessments Ethicsline Reporting (Internal and Supplier) and tracking of any complaints through daily, weekly and quarterly reporting Supply Chain Audits as appropriate (priority on higher risk areas) Targeted Human Rights Impact Assessments as appropriate (priority on higher risk areas) Monitoring media reports related to risk of forced or child labour and actioning as required

## 10. Conclusion

“Doing What’s Right” is a core Leadership Value at Maple Leaf Foods. We operate our business by acting with integrity, behaving responsibly and treating people with respect. We commit to providing a work environment that supports the health, safety and mental well-being of our people, characterized by mutual respect, fairness and empathy.

These principles are woven into our policies, procedures and practices. In addition, our commitment to human rights is embedded within our Maple Leaf Leadership Values, our Business Code of Conduct, our Supplier Code of Conduct and our Diversity, Equity and Inclusion (DEI) Blueprint. These policies and standards, along with compliance with applicable laws and regulations, protect all our people and those we serve, including our consumers, customers and communities.

Maple Leaf Foods remains committed to preventing forced labour and child labour from taking place in our businesses and in our supply chains, and we will continue to review our policies, procedures and practices periodically to determine any potential enhancements.

## 11. Approval and Attestation

This report was approved by our Board of Directors on March 13, 2024.

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.

***(“Signed M.H. McCain”)***

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Michael H. McCain  
Executive Chair, Maple Leaf Foods Inc.  
March 13, 2024  
I have authority to bind the Corporation.