

# MAPLE LODGE FARMS LTD.

REPORT ON THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN THE SUPPLY CHAINS ACT

**2023 REPORTING YEAR** 

### 1) Introduction

As a family-owned company, Maple Lodge Farms (MLF) is deeply committed to upholding "family first" values and this is at the core of everything we do. Our unwavering dedication to these values extends beyond our purpose - "We feed Canadians" – to prioritize the well-being of all our workers, the communities we serve, the animals upon which we exact our livelihood, and the environment we call home.

We are committed to upholding the highest ethical standards in all aspects of our operations, including the prevention of forced and child labour. As a covered entity under the *Fighting Against Forced and Child Labour in Supply Chains Act*, this report provides an overview of our efforts for the 2023 reporting year to prevent and reduce the risk of forced and/or child labour within our operations and supply chain.

#### 2) About Maple Lodge Farms Operations (Structure/Activities/Supply Chains)

MLF is a privately-held corporation. We are Canada's largest independent, family-owned poultry processor, supplying wholesome, nutritious chicken to Canadian families since 1955. MLF's corporate headquarters are located in Brampton, Ontario, and we employ approximately 3,000 people across our operations, which include a primary/further processing facility in Brampton, Ontario; a primary processing facility in St. Francois, New Brunswick; and a further processing plant, and distribution centre in Mississauga, Ontario.

MLF offers a full lineup of chicken products, including fresh and seasoned chicken cuts, frozen boxed meats, chicken bacon, deli meats, and wieners. MLF is Canada's number one supplier of Halal meat to the Canadian consumer marketplace. Our products are sold domestically through retail and food service channels and are exported to several countries worldwide.

Our supply chain involves the purchase of goods and services from a broad range of suppliers, the vast majority of our inputs coming from within Canada and the United States. The majority of the product we produce is fresh chicken sourced from Canadian licensed chicken farmers.

#### 3) Policies

MLF is committed to upholding and protecting human rights in all aspects of our operations. We are dedicated to conducting our business in a manner that respects the dignity, diversity and rights of all individuals including workers, customers, suppliers and the communities in which we operate. This commitment is reflected in our policies, practices, and decision-making processes.

Our policies uphold these principles, of which include, but are not limited to, the following:

- Prohibition of forced labour and child labour
- Fair wages, benefits and working hours in compliance with applicable laws and industry standards
- Safe and healthy working conditions including a workplace that is free of bullying, harassment, and violence
- Non-discrimination in employment practices

Freedom of association and the right to collective bargaining

We strive to provide a safe and inclusive work environment free from discrimination, harassment, or any form of human rights abuse. We recognize our responsibility to ensure an equally high standard is upheld in our supply chain, instituting policies and practices to ensure that we are monitoring, preventing, and addressing these risks in the production of our products.

MLF has taken the following steps to prevent and reduce the risk that forced or child labour is used at any step in the production of our products:

- Annual review of our hiring policies, which include age verification
- Annual review of our Whistleblower Policy and establishment of a process for anonymous reporting for any alleged non-compliance with our ethics policies
- Annual review of our Human Rights Policy
- Annual review of our Supplier Assessment Questionnaire
- Development of a Supplier Code of Conduct including provisions to prohibit child and forced labour, ensure a safe and healthy working environment for workers, ensure ethical business practices, and establish procedures for monitoring and compliance
- Ongoing training and reinforcement of our Values
- Conducting an internal assessment of risks of forced and/or child labour in our supply chains
- Communicating regularly with our Union (approximately 60% of our workforce is unionized)

#### 4) Due Diligence Processes

MLF is dedicated to preventing child and forced labour in its operations and supply chains. While we are early on in our journey of formalizing some of our policies and processes, our Purpose, Vision, Mission, and Values have long guided our business conduct, establishing a respectful, inclusive and fair working environment.

As outlined in Section 2 of this report, we have a stringent Business Code of Conduct in place which lays out our expectations for how we behave in accordance with our Values. We believe that by embedding responsible and ethical business conduct in our policies and processes we are able to create an environment of inclusivity, transparency and accountability, which is essential for the protection of human rights. We maintain a Whistleblower Policy that establishes procedures for reporting alleged violations of our ethics policies, which are investigated thoroughly so that appropriate corrective and/or disciplinary action can be taken.

We believe that our suppliers play a critical role in helping us achieve our sustainability and ethical sourcing goals. We work closely with our suppliers to ensure that we work only with those that align to our standard of conduct. We implement a thorough supplier assessment process which assures a comprehensive risk management system is employed by all our suppliers. We have recently established a formal Supplier Code of Conduct which covers the principles outlined in section 2 above. Our Supplier Code of Conduct sets forth the principles and standards that our suppliers are expected to adhere to when conducting business with our company to ensure that our supply chain is safe, human rights of all workers are respected, operations are environmentally responsible and sensitive to surrounding communities and ecosystems, a high standard of animal welfare is upheld, and our business is conducted in accordance with all applicable laws and with integrity and honesty.

MLF expects, at minimum, that all suppliers will adhere to this Code's principles and standards and to certify compliance by signing an attestation form. The Code also lays out provisions for MLF to conduct audits to ensure compliance with the Code. Further, our standardized contracts are under review to add the requirement that suppliers formally agree to the terms of this Code and outline the consequences of non-compliance, which include termination of the business relationship for serious violations. MLF also expects that each supplier will provide a copy of this Code to its contractors, subcontractors, and suppliers, and take steps to ensure compliance with the Code throughout its supply chain. Although we acknowledge there are currently gaps, we are committed to continuous improvement and will continue to advance our efforts to ensure the integrity of our supply chain.

Additionally, a comprehensive suite of HR policies and procedures, including a Human Rights Policy, as well as a robust Occupational Health and Safety program, support the well-being of our employees. Our policies are all designed to meet or exceed all relevant laws and are in alignment with our values and the guiding principles outlined in the UN Guiding Principles on Business and Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Finally, through collaboration with industry partners and stakeholders we seek to share best practices and drive continuous improvement in labour standards.

## 5) Risk Identification/Mitigation/Remediation

In the past year, we have undertaken an internal, high-level risk assessment of our suppliers. Through this first step, we have identified some potential areas of risk, primarily in the ingredient and consumable supply chain (i.e. garments, personal protective equipment), which will be further investigated over the next year. We will continue to strengthen our monitoring and auditing process, as outlined below, in order to detect and address instances of forced and child labour. However, to date, no instances of child or forced labour have been reported or identified.

In the interim, we continue to manage these risks through the measures documented above, namely:

- HR policies and procedures
- Occupational Health and Safety program
- Codes of ethics (Business and Supplier Code of Conduct)
- Supplier Assessments
- Risk Management Process
- Whistleblower Policy
- Human Rights Policy
- Industry collaboration

We are also in the process of implementing more targeted measures, such as adding compliance requirements to our standardized contracts and will take action, including termination of the business relationship, as may be required.

### **Training/Monitoring**

All employees undergo a mandatory comprehensive onboarding process which includes training on our policies and we implement a change communication process whereby changes in policies and procedures are communicated to employees. We are currently working to improve this process, as admittedly there are gaps. We are working to address those gaps by standardizing the frequency of policy review and undertaking an employee awareness program to ensure that, for example, our ethics policies and Whistleblower reporting process are reinforced. Concurrently, over the next year, we will work to

enhance our training programs to raise awareness of our ethics policies, which will include training on Child and Forced Labour.

With regards to our supply chains, as outlined above, we are in the midst of implementing our Supplier Code of Conduct which authorizes MLF to audit suppliers for compliance. Once the Code is fully implemented, it is our intent to assess compliance through our supplier assessment surveys, as well as through any reported incidents through our Whistleblower hotline, or other reporting means.

## 6) Conclusion

As a family-owned company, MLF recognizes the importance of respecting and promoting human rights and is dedicated to preventing forced and child labour in our operations and supply chain. We are committed to conducting our business in a manner that respects the dignity and rights of all individuals and the well-being of our workers. We are conscious of the potential human rights impacts associated with our operations, including the conditions for workers, animal welfare, and the communities in which we operate, and are committed to ensuring their health, safety and well-being.

## 7) Approval and Attestation

Date: May 29, 2024

This report was approved and attested as of May 29, 2024 as required under subparagraphs 11(4) and 11(5) of the Act by the Board of Directors of MLF for its prior financial year ended December 2023.

Signed:
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Member, Board of Directors

I have the authority to bind the Corporation.

And;

Signed: by:

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Member, Board of Directors

I have the authority to bind the Corporation.