

Fight Against Forced Labour and Child Labour Act

Legislation: *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Reporting Year: 1

Reporting Period: 1 January 2023 – 31 December 2023 (Calendar Year 2023)

Accountable Signing Authority: President

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Martin Brower Canada Overview

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9, this statement outlines the measures implemented by Martin Brower Canada to address the risks of modern slavery (forced labour & child labour) within our operations and supply chain.

Martin Brower Canada is a global leader in supply chain solutions. We partner with organizations to architect smart, sustainable supply chains that fuel growth and positively impact customers and communities.

We are dedicated to creating an outstanding work environment for our team of 1000+ employees, who combine our expertise with the latest technologies to deliver unmatched value for our customers and protect their brands.

At Martin Brower Canada, we actively uphold human rights and work to prevent any violation of others' human rights through the policies and procedures we have established. We are committed to establishing safe, inclusive, and respectful work environments wherever we conduct business. We value the fundamental rights of our employees and all who work within our supply chain, which encompass freedom from slavery and child labour, the freedom to associate (or not associate) and engage in collective bargaining, equal opportunities for all, a safe and healthy workplace, and freedom from discrimination and harassment.

Martin Brower Canada is continuing to develop and expand our understanding of the risks associated with modern slavery and to identify the areas within our operations and broader supply chain that may be impacted by such challenges. We are focused on collaborating across our business and supply chain to implement appropriate practices that mitigate and address potential risks.

Modern slavery is completely unacceptable within our organization and supply chains. Martin Brower Canada acknowledges our responsibility to uphold the rights of individuals working for our company, as well as those associated with suppliers and business partners who prioritize human rights for their own employees. Recognizing that human rights issues require multifaceted approaches, we consider it crucial to engage with all stakeholders to promote awareness and foster understanding.

Section One: Our Structure, Operations & Supply Chains

Our Structure

Martin Brower Canada is part of the Reyes Family of Businesses (RFB). The RFB is a global business, with over 36,000 employees, and more than 200 properties. RFB are dedicated to being the best in the industry by achieving unmatched value for their customers while creating an outstanding work environment for their employees.

Martin Brower Canada is a leading supply chain solutions provider architecting smart, sustainable supply chains that fuel growth, creating an outstanding work environment for our employees and delivering unmatched value to our customers while protecting their brands.

Globally, we are renowned for finding innovative and timely means of delivering products to customers and are well known for setting new standards for on-time delivery, dependability, efficiency, and safety at the international level. Martin Brower has significant presence globally with sites in Australia, Bahrain, Brazil, Canada, Costa Rica, France, Ireland, Korea, Kuwait, New Zealand, Oman, Panama, Puerto Rico, Qatar, Singapore, the United Kingdom, United Arab Emirates, and the United States.

MB Canada Operations

Martin Brower Canada is a Supply Chain Solutions and Logistics company providing inbound and outbound logistics services in all provinces across Canada.

The core operational outputs of Martin Brower Canada sites include operation of a warehouse and cold store facility where pre-packaged products are procured from approved suppliers and distributed to customer locations.

The Martin Brower Canada culture is built off a strong sense of social responsibility and ethical behaviour, a commitment to safety across all elements of operation, and a dedication to strengthening the communities where our people and customers work and live.

Our culture is further defined by our CARES values, which are at the heart of everything we do. Protecting our people, customers, and our communities is paramount.



Our Supply Chains

Martin Brower Canada operates a different supply chain model to other logistic providers. Martin Brower Canada coordinates with manufacturers and suppliers to distribute goods to its customers. Martin Brower Canada is a vital link for our customers and their suppliers in the end-to-end network. Martin Brower Canada purchases stock from our Customer’s Suppliers that stock their corporate-owned and franchised restaurants, ensuring an assured supply is achieved. This means that our suppliers can be broken down into two clear categories, the first being suppliers to our Customer’s corporate-owned and franchised restaurants (System Suppliers) and the other being Martin Brower Canada only suppliers (Non-System Suppliers).

Non-System Suppliers Overview

The Martin Brower Canada supply chain includes sourcing goods and services for Martin Brower Canada from close to 1,500 active suppliers (non-system suppliers). Majority of our indirect spend in FY2023 was through suppliers operating within Canada. Our supplier base includes multiple local contract transport companies and operational expense vendors whose services keep our business going.

Whilst our direct suppliers are registered Canadian and American entities, operating in North America, inputs acquired by these suppliers originate from multiple geographic locations, such as a few European countries, and only one in Asia – making the potential very minimal for present modern slavery risks.

Our sourcing arrangement for FY2024 include goods and services such as fleet & parts, consumables, IT equipment/services, PPE, uniform, packaging, logistics contractors (common carriers), agency labour, cleaning contractors, security service, tires and fuel.

Section Two: Policies & Due Diligence Processes

Assessing & Addressing Modern Slavery Risks

Martin Brower Canada supports the goals of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and take seriously our responsibility to act with due diligence to avoid infringing on the human rights of others and address any impact on human rights if they occur.

For all Non-System Suppliers that we contract with (e.g., transport contractors, cleaning companies and waste service provider) Martin Brower Canada requires these companies to comply with the Martin Brower Canada Code of Conduct ensuring fair and ethical workplace standards across our supply chain.

The Company Code of Conduct addresses human rights, workplace environment, environmental management, and business integrity. Martin Brower Canada has also published a Global Transparency in Supply Chain Policy which reinforces and strengthens our commitment to the rights of employees, supply chain, and the global communities in which we serve.

Our Customer has implemented a Supplier Workplace Accountability (“SWA”) Program which applies to Martin Brower Canada and all System Suppliers, and which includes prohibitions on forced labour and child labour, and third-party audits to ensure continued compliance, as described in more detail below.

In addition to measures currently in place, we intend to implement a questionnaire to all relevant direct suppliers to Martin Brower Canada (i.e. Non-System Suppliers) and Customer suppliers (i.e. System Suppliers) beginning in 2024. For clarity, the questionnaire is being implemented independently by Martin Brower Canada, and not in conjunction with our Customer. This questionnaire will be introduced in order for suppliers to conduct a self-audit and confirm that they are operating in compliance with applicable legislative requirements and meet the Customer’s Supplier Code of Conduct. This process will be staged based on prioritizing the highest risk jurisdictions.

Direct Suppliers

Martin Brower Canada will be contacting our direct suppliers and ensuring they adhere with applicable labour, employment, immigration laws and any other local legislation relating to forced labour or child labour. If Martin Brower Canada determines a direct supplier is in breach, we will notify them of the breach and suspend our working relationship while we investigate further and until corrective action is put in place.

Customer Suppliers

In addition to direct suppliers Martin Brower Canada also imports and distributes certain products on behalf of our Customer to their corporate-owned and franchised restaurants (“Customer suppliers”, i.e. System Suppliers).

Should we determine the use of forced labour or child labour by a Customer supplier, we will notify the Customer immediately for investigation and corrective action.

Employment Polices & Practices

We conduct our activities in a manner that respects human rights as set out in the United Nations Declaration of Human Rights and are committed to ethical recruitment and employment practices. These principles are underpinned by a suite of policies, many of them relevant to modern slavery.

Contained within our policies and training, employees are reminded that they have an obligation to report any conduct which they believe to be a violation or apparent violation of our policies. Employees are able to report the matter to their supervisors, higher management, the Office of Ethics and Compliance, the business unit General Counsel or the Reyes Holdings Ethics Hotline.

Martin Brower Canada Policies

- Guidelines of Business Conduct
- Anti-Discrimination (EEO) Policy
- Code of Conduct Policy
- Grievance Policy
- Privacy Information & Disclosure Policy
- Social Workplace Accountability Policy
- Workplace Health and Safety Policy
- Environmental Policy
- Anti-Bribery Policy
- MB Global Compliance
- Transparency in Supply Chain

Reports may be made anonymously and will be treated as confidential. The Company strictly prohibits retaliation against an Employee who raises a concern in good faith, who makes a report of suspected misconduct, or who cooperates with a Company authorized investigation into potential wrongdoing.

Section Three: Risks of Modern Slavery Practices in Operations and Supply Chain

Our potential exposure to indirect association of modern slavery practices comes through our

supply chain, as we rely on extensive use of contracting and subcontracting services. The majority of our spend is through preferred global manufacturers and brands who themselves are required to report through the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* or are able to provide detailed information on their established policies and procedures that highlight their commitment to ethical practices. Martin Brower Canada will refer to its suppliers' reports under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, where available.

Just like our Customer, we expect all suppliers, regardless of the cultural, social and economic context, to meet expectations of fundamental rights for all people. This means treating their employees with fairness, respect and dignity, and following practices that protect health and safety for the people working in their facilities.

Martin Brower Canada assesses low to minimal risk of forced labour or child labour in our supply chain. Martin Brower Canada is not aware of any forced labour or child labour in our supply chain. Both statements are subject to the limitations of Martin Brower's risk identification activities as described in more detail above and below.

Section Four: Actions to Remedy Modern Slavery (Risk Identification Activities)

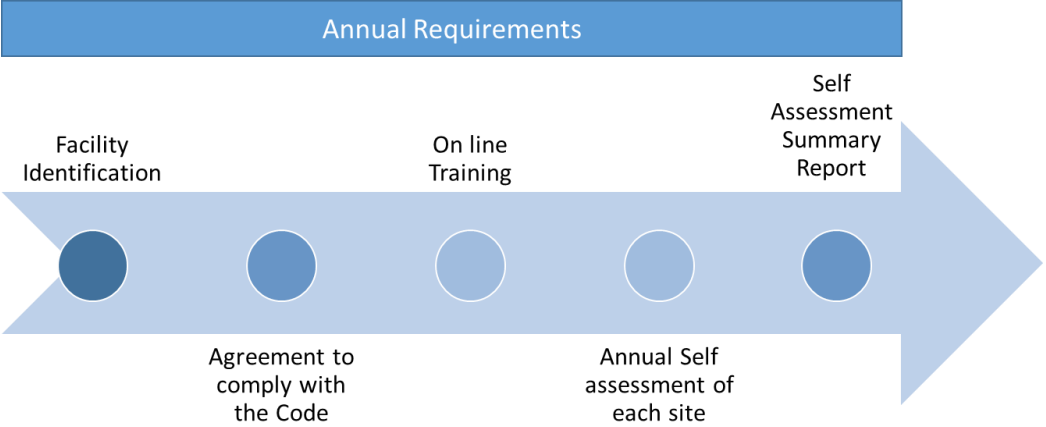
As noted above, Martin Brower Canada is not aware of any incidents of forced labour or child labour in our activities or supply chain in our past financial year, subject to the limitations of our risk identification activities as described in more detail above and below. Accordingly, Martin Brower Canada has not had to take any remedial measures in response to incidents of forced labour or child labour. Some of the remedial and due diligence measures available to Martin Brower Canada are set out in more detail below.

Supplier Workplace Accountability (SWA) Program

As outlined previously, Martin Brower Canada suppliers can be broken down into two clear categories, the first being suppliers of our Customer's corporate-owned and franchised restaurants (System Suppliers) and the other being Martin Brower Canada suppliers (Non-System Suppliers).

Our Customer has a Supplier Workplace Accountability (SWA) program which all System Suppliers, including Martin Brower, are required to comply with. The main purpose of the SWA program is to help suppliers and facilities to understand their responsibilities, to verify facilities ability to demonstrate compliance with these standards and work together for continual improvement.

The SWA program has the following steps which are required to be undertaken:



System Suppliers are also required to comply with the Customer’s Supplier Code of Conduct which outlines minimum expectations in relation to the following:

Human Rights	Business Integrity	Workplace Environment	Environmental Management
<ul style="list-style-type: none"> •UN Declaration of Human Rights •Freedom of Association •Employment Status •Employment Practices •Anti-Discrimination & Fair Treatment •Working Hours & Rest days •Underage labour •Wages & Benefits 	<ul style="list-style-type: none"> •Compliance with the Law •Anti-bribery •Facility audits & assessments •Accurate and transparent books & records •Confidentiality •Grievance Mechanism •Whistleblower protection •Additional Standards are required 	<ul style="list-style-type: none"> •Safety Management Systems, including hazard identification, reporting and rectification •Training on emergency management and response •Site security 	<ul style="list-style-type: none"> •Managing and minimizing environmental impacts of facilities, including: <ul style="list-style-type: none"> •Air emissions •Waste reduction •Water usage •Greenhouse Gas Emissions

In addition to these requirements, facilities (including System Supplier facilities) are also required to undergo a periodic physical inspection audit which is conducted by a third-party auditing firm.

The auditor will measure how well the facility complies with the Code and identifies areas of non-compliance. A final report, with any non-compliance observations, is issued through our Customer’s third party auditing system. The supplier/facility makes decisions about how to improve and enhance compliance to ensure corrective and preventative actions are sustainable through a corrective and preventative action plan (CAPA).

SWA: Effective Action

Where non-compliance is identified through an on-site SWA audit, System Suppliers work with a

third-party audit firm to complete a corrective and preventative action plan addressing the non-compliance. The plan must provide specific time frames within which corrective action will be taken, root causes analysis, and policies and/or procedures updated. In addition, the plan must be designed to avoid recurrence of the non-compliance and establish specific accountability. In instances of significant non-compliance, suppliers are subject to a follow-up audit to ensure that the non-compliance has been properly addressed.

The SWA program is designed to support System Suppliers in meeting our Customer's standards. However, there are circumstances under which a supplier will be removed from the supply chain to address instances of significant non-compliance with the Social Workplace Accountability (SWA) Policy.

Martin Brower Canada requires both System and Non-System Suppliers to provide their own internal reporting mechanisms to ensure their employees have a confidential, safe, and timely way to report workplace concerns without the fear of retaliation. The SWA Policy stipulates that suppliers create internal grievance mechanisms and programs for handling reports of workplace grievances, including anonymous reports.

Section Five: Any Measures to Remediate the loss of Income to those impacted by the Elimination of Modern Slavery

Martin Brower Canada has not as of the date of this report become aware of any loss of income resulting from our measures to eliminate the use of forced labour and child labour in our activities and supply chains.

Section Six: Training Provided to Employees on Modern Slavery

Martin Brower Canada employees receive annual training to educate them about the business standards which they are expected to adhere to. This training aims to certify their understanding of and commitment to upholding the Standards. The training schedule includes the following modules:

- Annual Re-induction Program
- Annual Ethics Certification Program
- Annual Anti-Bribery and Corruption Training

For System Suppliers, the global SWA program includes an online training platform where they can access materials that provide guidance on preventing modern slavery. Training modules include Ensuring Eligibility to Work, Protecting the Rights of Migrant Labour, and Implementing Grievance Mechanisms. For example, the Migrant Labour training aims to educate suppliers on the risks related to modern slavery when sourcing migrant labor and some key actions they can take to ensure they are protecting the rights of migrant workers in their facilities.

Section Seven: Assessing Effectiveness of Actions Against Modern Slavery

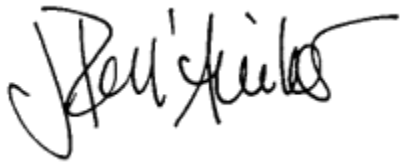
Annually we will be asking direct suppliers (i.e. Non-System Suppliers) and System Suppliers to reaffirm and/or confirm that they are not using forced labour or child labour in their supply chains for products supplied to Martin Brower Canada and Customer's corporate-owned and franchised

restaurants respectively. As mentioned above, this process will be staged based on prioritizing the highest risk jurisdictions. All completed questionnaires will be conducted via Microsoft Forms and saved in a secure shared folder for the HR team to track and monitor on an ongoing basis. In addition, we will maintain a tracking sheet for all direct suppliers and Customer suppliers, to capture completed and logged questionnaires which will be reviewed by the President & VP, Human Resources to validate compliance.

We will review annually our reporting document and update it as necessary to ensure continued compliance and implement any improvements required to ensure we are accurately obtaining and retaining information from our direct suppliers and Customer suppliers.

Approval

This report is approved by the President of Martin Brower Canada.



May 27th, 2024

Date: _____

Julie Dell'Aniello
President