

BILL S-211: Fighting Against Forced Labour and Chile Labour in Supply Chains Act

1. Structure, activities and Supply Chains

Molinaro's Fine Italian Foods LTD. has 7 business units – 2076143 Ontario Limited, 2391361 Ontario Ltd, Bluevest Holdings ltd, G&A Capital Inc, Molinaro Management Ltd, Molincroft Farm ltd, and V F & G Holdings Inc which are all fully owned and operated in Canada.

Molinaro's Fine Italian Foods Ltd is a food manufacturing company that produces and distributes private label and branded pizza and pizza items across North America.

2076143 Ontario Limited – Land in Acton under development

2391361 Ontario Ltd – Land in Acton under development

Bluevest Holdings Inc – Investment company which owns industrial units and a residential condo. All properties are being leased out.

G&A Capital Inc – Investment company that holds stock positions, first and second mortgages

Molinaro management Inc – Owns property and a building in Oakville. Leases to Molinaro's Fine Italian Foods Ltd.

Molincroft Farm Ltd – Land in Acton under development

VF&G Holdings Inc. – Investment company that holds stock and life insurance policies

2. Policies and due diligence processes

Molinaro's trains all employees and has policies (ethical and code of conduct) posted in common welfare areas. It is the policy of Molinaro's Fine Italian Foods Ltd. that Management and employees uphold the highest standards of ethical, professional behavior. This policy communicates our values and expectations and emphasizes the importance of responsible workplace policies and practices, which generally comply, at a minimum, with applicable occupational health and safety, environmental and labour laws, and regulations. The standards outlined below reflect the values we uphold in our own policies, and we expect our suppliers to follow these standards and requirements:

- Employment is freely chosen. There is no forces, bonded, indentured or involuntary prison labour.
- Workers are not required to pay fees or 'deposits' or original identity papers with their employer and are free to leave their employer after reasonable notice
- We do not engage in or support the use of child labour



- Molinaro's Fine Italian Foods Ltd. nor organizations supplying labour to Molinaro's Fine Italian Foods Ltd. engage in or support human trafficking
- Wages and benefits are paid for standard working week meet, at a minimum, national legal standards
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid
- Molinaro's Fine Italian Foods Ltd. treats all personnel with dignity and respect of the individual and does not engage in mental or physical coercion or verbal abuse. All disciplinary measures should be recorded

3. Parts of the business and supply chain that carry a risk

People Risk

While the overall risk that our operations may cause or contribute to modern slavery with respect to our workforce may be low, we are committed to providing a safe, respectful and fair workplace and have human resources policies and procedures that support the protection of human rights.

Supply Chain Risk

Labour – Human Resources and Agencies are to review proper government documentation to ensure all employees of age to legally work at our facility.

Suppliers – All of our suppliers are located in Canada and the US. We are a pizza manufacturing company so the majority of our raw material and packaging are locally sourced from North American markets. Our main ingredients include cheese (sourced from Canadian Dairy Farmers and US sources), flour (sourced from Alberta Spring Wheat), Tomatos (sourced from California), paperboard and corrugated packaging (sources from Canadian and US mills). While the risk of Child labour and trafficking is low in North America there is still risk that some of our suppliers are using these unethical labour approaches to have their items sourced/produced. We do have one supplier who is sourcing their materials from China which poses a risk. China does not have a law that fights against child/forced labour in the supply chain process. The China Family Panel Study states that approximately 7.74% of children between 10 and 15 years of age are engaged in child labour.



4. Steps taken to assess and manage that risk

Molinaro's Fine Italian Foods will create a document that will be sent out to all vendors and will need to be completed and sent back at a given deadline. This document will ask for the company's standard information (name, address, contacts, etc). The document will ask suppliers if they have an Ethics Policy in place as well as a Code of Conduct. The document will ask suppliers the origin of their supplies and if forced labour and child labour were used. Completed reports will be analyzed from the management team of Molinaro's. If forced labour/child labour is used or if it is unclear that these are used or not then a new source/supplier will need to be found to ensure that the items were sourced with proper regulations.

5. Measures taken to remediate any forced or child labour

The responsibility to remediate forced or child labour is shared across Molinaro's Fine Italian Foods management and its supply chain department. The company will review, analyze and tally the results of the documents sent to suppliers as soon as they come back. As mentioned above, if forced labour/child labour is used or if it is unclear that these are used or not then a new source/supplier will need to be found to ensure that the items were sourced with proper regulations.

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

Along with the current ethics and code of conduct policy, management and supply chain employees will be trained on the definitions of child labour and forced labour from the bill S211 and on the details of our documents sent to suppliers by the supply chain department.

7. How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

Molinaro's Fine Italian Foods management will summarize the results from the documents sent to suppliers based on categories from high to low risk. On an ongoing basis the data will be monitored and compared with prior year results to assess the effectiveness of the program. The company will collaborate with employees, customers and suppliers to develop and use best practices to fight against forced labour and child labour.



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.

- Full name: Vincenzo Molinaro
- Title: President
- Date: May 15 2024
- Signature,



I have the authority to bind Molinaro's Fine Italian Foods Ltd, 2076143 Ontario Limited, 2391361 Ontario Ltd, Bluevest Holdings Ltd, G&A Capital Inc, Molinaro Management Ltd, Molincroft Farm Ltd, and V F & G Holdings Inc.

