

# FORCED LABOUR AND CHILD LABOUR IN CANADIAN SUPPLY CHAINS REPORT

FOR THE FISCAL YEAR ENDED ON APRIL 30, 2024



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#### 1. Introduction

#### **Application**

This report, prepared pursuant to the Fighting Against Forced Labour and Child Labour in Canadian Supply Chains Act (the "Act"), pertains to More Than Just Feed Inc.'s commitment to upholding all persons' human rights and dignity. We expect our suppliers to operate in a manner consistent with our Core Values and to promote integrity in all aspects of their business, including labour and human rights.

#### **Our Commitment**

At More Than Just Feed Inc. ("More Than Just Feed"), we are committed to acting ethically and with integrity in all our business dealings and relationships, promoting compliance with applicable laws and protecting the dignity and rights of all people connected to our business. We strive to work closely with our suppliers to ensure their workforce and the workforce of their supply chains are treated with respect and dignity. We are committed to fostering inclusive workplaces and sourcing products responsibly.

This is More Than Just Feed's first statement pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9), and it will be reviewed annually hereafter. Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address the risks of Forced Labour and Child Labour in our business and supply chain.

# 2. Our Company Structure, Business Operations and Supply Chain

#### Our Structure

More Than Just Feed is a federally incorporated entity. More Than Just Feed is an agricultural multi-species feed manufacturing and supply company offering Western Canadian Farmers goods and services.

More Than Just Feed is the sole company covered in this Report and is headquartered in Strathmore, Alberta. More Than Just Feed provides goods and services to the Canadian Prairie Provinces, specializing in ruminant and monogastric feed and premixes. Our services include industry-leading nutrition, management and technical consultants. This includes production, warehousing, and transloading facilities across the Canadian Prairie Provinces (Alberta, Manitoba and Saskatchewan). We are a team of 150 people, all of whom work in Canada. To learn more about our business, please see www.morethanjustfeed.ca.

#### Our Activities and Supply Chain

More Than Just Feed's activities include the production, sales, distribution and import of goods in Canada to support the manufacturing and sales of monogastric and ruminant feed products.

The inputs used in manufacturing our products, including raw ingredients and commodities, are sourced from Tier 1 (direct) suppliers located in Canada and the United States who import ingredients internationally, primarily from Asia. We believe these risks are effectively managed, as we procure any high-risk ingredients from a small number of preferred, reputable Tier 1suppliers located in Canada and the United States who have policies in place to prevent and condemn Forced Labour and Child Labour in their supply chains. Our supply chain includes ancillary services that contribute to our primary production operations, such as transporters and carriers.

### 3. Policies and Due Diligence Processes

**Policies** 

#### a. Governance and Responsibilities

More Than Just Feed's Board is accountable for overseeing the effectiveness of More Than Just Feed's risk management systems and internal controls.

#### b. Code of Conduct and Ethics

Our <u>Code of Conduct and Ethics</u> applies to all of our employees, executives, officers, and directors and outlines the expectations of our employees to act with integrity, do the right thing, and observe the highest ethical standards of business conduct in their dealings with customers, suppliers, competitors, and fellow employees.

More Than Just Feed greatly values the quality of the environment it offers employees and takes steps to promote an open, healthy and inclusive workplace outlined in our Employee Handbook and Workplace Violence and Harassment policy.

The Code, among other things, stipulates our opposition to all forms of forced labour and child labour and our commitment to ensuring it does not take place anywhere within its business activities. We expect our suppliers and other business partners to share this commitment to eliminating illegal labour from our supply chain.

We also reserve the right to request that our suppliers provide additional information for the purposes of managing and monitoring compliance with the code. Anyone may contact us to report a violation using a dedicated anonymous reporting <u>form</u>. We undertake to help suppliers remedy code compliance issues and may choose to take various steps in respect of a noncompliant supplier, which could include terminating the business relationship with the supplier in question.

#### c. Reporting Violations

Employees must report in good faith any questionable behaviour that may be illegal, fraudulent or against the Code, including Forced Labour and Child Labour. We require and encourage employees to report any violation of this Code and will investigate all reported violations.

#### Due Diligence

To identify and manage the risks of forced labour and child labour in our own business, we periodically assess our employment practices to ensure we meet or surpass employment standards in the industries and jurisdictions in which we operate.

We are constantly in the process of reviewing and improving our approach to supplier due diligence with the aim of ensuring a more robust action plan to address forced labour and child labour risks. As part of our initiative to identify forced labour and child labour risks in our supply chain, we plan to conduct ongoing risk assessments for our suppliers.

Identified high-risk suppliers have been contacted. Each high-risk supplier has confirmed that they do not employ, condone or know of any forced labour or child labour practices in their supply chains and that they practice their own due diligence within their supply chain, in accordance with the Act. We will continue to assess identified high-risk suppliers.

#### 4. Our Supply Chain Risk Profile

#### a. Among our personnel

All More Than Just Feed employees are employed in Canada, where we have fair and responsible employment practices to protect and promote workers' rights and follow all applicable Canadian Labour Code employment regulations.

#### b. Within our supply chains

More Than Just Feed's exposure to Forced Labour and Child Labour is minimal since we procure goods directly through Tier 1 Canadian and US suppliers. Within our operations, we have assessed our risk profile based on sector and industry risks as low or high based on geographical location and goods type.

To assess the risk of forced and child labour in our supply chain, we looked at potential high-risk areas outlined in the Global Slavery Index, including:

- The components and raw materials we source from our Tier 1 suppliers for use in the manufacture of our animal feed products and their geographical location of origin
- The procurement of electronics and electronic components

We believe these risks are effectively managed, as we procure any high-risk ingredients and electronics from a small number of preferred, reputable Tier 1 suppliers located in Canada and the United States who have policies in place to prevent and condemn Forced Labour and Child Labour in their supply chains.

We recognize the potential risks of forced labour and child labour in our extended supply chain, and the complexity and challenges in operationalizing forced labour and child labour compliance. Since More Than Just Feed does not work with extended suppliers nor employ these individuals,

we are committed to working with our Tier 1 suppliers to tailor our risk management actions to address those risks as outlined in our actions taken.

#### 5. Actions Taken to Combat Forced Labour and Child Labour

Building on the policies and procedures we currently have in place, More Than Just Feed is in the process of developing and implementing strategies to:

- Assess and better understand areas of potential risk in our business and supply chain,
- Monitor potential risk areas in our business and supply chain; and
- Reduce or mitigate forced or child labour in our business and supply chain.

Such processes and actions include, but are not limited to, the following:

- A Forced Labour and Child Labour questionnaire has been added to all existing bulk, retail and supplier approval forms, which are sent out to all new suppliers.
- We conducted an assessment of all existing direct Tier 1 suppliers. We identified the geographical regions and suppliers with high-risk goods exposure to forced labour and child labour. All determined high-risk Tier 1 suppliers were contacted, and we received confirmation that they do not employ, condone, participate or know of any forced labour or child labour in their supply chain(s).
- More Than Just Feed will provide education and training to our employees involved in supply chain and human resources functionalities.
- More Than Just Feed will implement a Supplier Code of Conduct in the next fiscal year which will be provided to all suppliers outlining our commitment and expectations.

# 6. Supplier Adherence to our Values

More Than Just Feed seeks to do business with suppliers that have similar values, ethics and moral business practices, including those related to human rights. More Than Just Feed will not tolerate any form of forced labour or child labour within its supply chain.

#### 7. Remediation Measures

In the fiscal year ended April 30, 2024, we have not identified any instances of forced labour or child labour in our business or supply chains, therefore, we have not been required to take remedial measures.

<sup>&</sup>lt;sup>1</sup> High-risk countries and goods based on data from the Global Slavery Index at walkfree.org.

We recognize that instances of forced labour or child labour often impact the human rights of particularly vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women, or children. To date, we have not discovered instances of forced labour or child labour in our business and supply chain, therefore, we have not been required to take measures to remediate the would-be loss of income to vulnerable families.

If we do identify incidents of forced labour within our activities or supply chains, we will consider the appropriate remediation strategies in compliance with international standards.

## 8. Training

Managers and other senior employees receive ongoing training on our values, human rights, and applicable employment and labour practices. We currently have optional online Modern Slavery training available for key personnel who request it and are in the process of adding an internal training program to educate and train our employees to recognize potential situations involving forced labour and child labour in our business and supply chain.

In order to further develop the above-mentioned policies, we have included our Forced Labour and Child Labour principles in our employee onboarding materials and employee handbook. Taking a risk-based approach, we are also in the process of developing additional training for key personnel in procurement, human resources and management positions on how to detect and report forced labour and child labour risks.

#### 9. Assessment of Effectiveness

To date, More Than Just Feed has not taken any actions to assess the effectiveness of our actions in preventing and reducing the risks of child labour and forced labour in our activities and supply chain. Going forward, we will assess the effectiveness of our actions by evaluating KPIs, namely the number of staff trained, the number of suppliers and contractors screened, the number of reported breaches, and the instances of remedial actions being taken.

As a part of ongoing enhancements, we will continue to identify emerging risks. More Than Just Feed will continue developing and implementing required due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and child labour in our activities and supply chain.

# 10. Approval and Attestation

This statement is made in accordance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act and constitutes More Than Just Feed's forced labour and child labour report for the financial year commencing on May 1, 2023, and ending on April 30, 2024.

This statement was approved by the Board of Directors of More Than Just Feed pursuant to Paragraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 23, 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.

I have the authority to bind More Than Just Feed Inc.

Jeffrey Pascoe

**Director and Chief Executive Officer** 

More Than Just Feed Inc.

May 23, 2024