



New Rosedale Colony of Hutterian Brethren

Forced Labour and Child Labour in Supply Chains Company
Assessment

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Executive Summary

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced through Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), aim to increase industry awareness and transparency and drive businesses to improve practices. The Act requires entities to report on the steps taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity. There are seven mandatory reporting areas that must be investigated and reported on which include:

- Its structure, activities and supply chains.
- Its policies and due diligence processes in relation to forced labour and child labour.
- The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.
- Any measures taken to remediate any forced labour or child labour.
- Any measures taken to remediate the 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.
- The training provided to employees on forced labour and child labour.
- How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

Introduction

This report is New Rosedale Colony of Hutterian Brethren (“New Rosedale” or “Colony”) response to Bill S-211, An Act to support the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), sections 11(1) and 11(3).

The entities covered by this report include New Rosedale (trust number T11-4714-60), New Rosedale Colony Farms Ltd. (business number 121986152), New Rosedale Feedmill Ltd. (business number 833819600) and Canada Lick Blocks Ltd. (business number 722675915).

New Rosedale Colony of Hutterian Brethren Trust controls New Rosedale Colony Farms Ltd., New Rosedale Feedmill Ltd. and Canada Lick Blocks Ltd. collectively having a place of business in Canada, do business in Canada, have assets in Canada and meet both the revenue and asset thresholds – therefore, meeting the definition of an Entity according to this Act.

The financial reporting year of New Rosedale covered by this report is for the year ending December 31st, 2023.

Structure, Activities & Supply Chain

New Rosedale Colony of Hutterian Brethren

The Colony is situated at 16-14-010-08W1, Box 460 Portage la Prairie, MB, R1N 3B7. This Colony operates on approximately 17,000 acres of land, and for the purposes of this report, operates within the agriculture and manufacturing industries. This Colony is comprised of 161 total members.

The Hutterian Brethren Church (“the Church”) was recognized by an Act of Parliament in Canada in 1951. Members of the Church (“Hutterites”) live communally in settlements (“colonies”) and practice an agricultural way of life where all property and assets are held communally for the benefit of all Hutterites. Cultural norms for Hutterites include recognition of adulthood at age 15, and the practice of lifelong education. Hutterite children attend traditional school from age 3-15, after which they participate in vocational training through apprenticeships. With skills learned through their vocational training, Colony members participate in the economic activities of the Colony including farming, carpentry, and mechanics.

The culture of the Hutterites, as recognized by their faith and codified by an Act of Parliament, is to live communally and share among members which extends to common ownership of property and distribution of income. Each family is provided a house on the Colony and families are financially provided for by the income generated by the economic activities of the Colony.

Hutterites participate in lifelong education that combines traditional and vocational teaching. This is a key pillar of the Church who support their members from “cradle to grave”. Their approach to education is compliant with Canada’s child labour standards.

The following outlines the activities related to the production, sale, distribution, or import of goods as they relate to the Act stemming from New Rosedale Colony Farms Ltd., New Rosedale Feedmill Ltd. and Canada Lick Blocks Ltd.

New Rosedale Colony Farms Ltd.

Structure

New Rosedale Colony Farms Ltd. (“New Rosedale Farms”) operates the farming operations of the Colony. The operations are located at Box 460, Portage la Prairie, MB, R1N 3B7.

The individuals working for New Rosedale Farms are members of the Colony.

Activities

New Rosedale Farms operates the farming operations which include the activities of crops (canola, wheat, barley, corn, peas and oats), hog, poultry and general farming (cattle).

Supply Chain

New Rosedale Farms procures goods within the categories of crop operations, hog operations, poultry operations and general farm operations. See Figure 1 for a breakdown of these activities.

The supply chain of New Rosedale Farms involves purchasing goods such as:

- Crop Activities: chemicals, fertilizer and seed;
- Hog Activities: feed, hog purchases and veterinary;
- Poultry activities: feed, poultry purchases and veterinary; and
- General farming activities: feed, grain transferred to feed, livestock purchases and veterinary.

For the purposes of describing and evaluating New Rosedale Farms supply chain, suppliers who account for at least 1% or more of the total procurement activities over the 2023 fiscal year were reviewed. New Rosedale Farms has limited visibility into the supply chain beyond first-tier suppliers, therefore, the risk assessment focuses only on direct suppliers. Each of the suppliers reviewed are based in Canada.

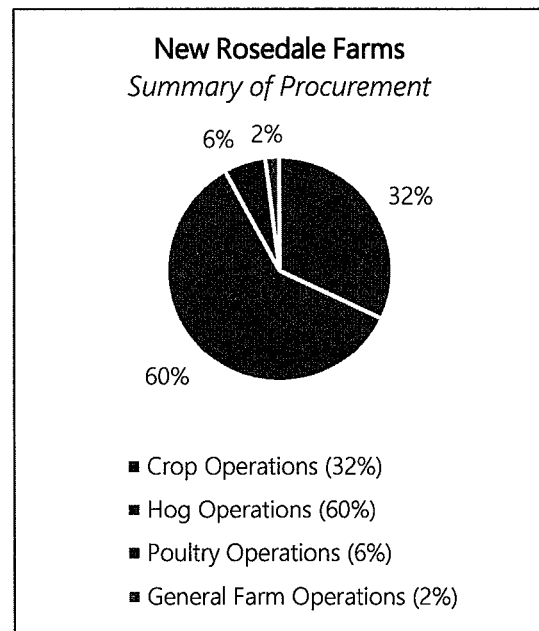


Figure 1: New Rosedale Farms - Summary of Procurement

New Rosedale Feedmill Ltd. and Canada Lick Blocks Ltd.

Structure

New Rosedale Feedmill Ltd. (“NR Feedmill”) operates within the manufacturing industry. This entity is located at Box 460, Portage la Prairie, MB, R1N 3B7, and is owned and operated by the Colony. There are

approximately 30 employees who work for this entity - 15 Colony members and 15 individuals hired outside of the Colony.

NR Feedmill has been Hazard Analysis Critical Control Point (“HACCP”) certified since 2007. This status is maintained through an annual, independent audit led by the Animal Nutrition Association of Canada. It is recognized by the Canadian Food Inspection Agency and is considered the top HACCP program in the feed manufacturing industry in Canada.

Canada Lick Blocks Ltd. (“Cana-Lix”) operates at NR Feedmill, also within the manufacturing industry. Products of Cana-Lix are sold through NR Feedmill.

Activities

NR Feedmill’s operations include the production of backyard chicken feed, pig feed for commercial operations and beef cattle minerals. These products are sold to customers, in bulk, mini-bulk bags or in small paper-poly bags.

Additionally, NR Feedmill also sells ingredients such as Calcium and Lysine for customers with an on-farm Feedmill.

Cana-Lix’s operations include the manufacturing of beef cattle, horse, and sheep lick tubs. Each product provides protein, energy, minerals, and vitamins for the animals.

Supply Chain

The supply chain of NR Feedmill and Cana-Lix involves the purchasing of goods among the categories of feed ingredients, grains and proteins, lick tubs and supplies, and general equipment. As Cana-Lix sells products through NR Feedmill, both supply chains have been consolidated for procurement analysis and risk assessment for the remainder of this report.

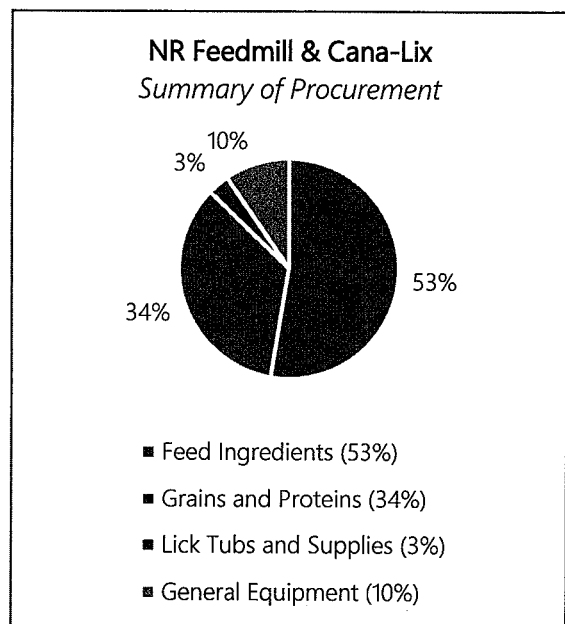


Figure 2: NR Feedmill and Cana-Lix - Summary of Procurement

See Figure 2 for a breakdown of NR Feedmill and Cana-Lix’s procurement during the fiscal year. For the purposes of describing and evaluating the supply chain, suppliers who account for at least 1% or more of the total procurement activities over the 2023 fiscal year were reviewed. NR Feedmill and Cana-Lix have limited visibility into their supply chain beyond first-tier suppliers, therefore, the risk assessment focuses only on direct suppliers. Suppliers of NR Feedmill and Cana-Lix are located in Canada and the United States.

Policies & Due Diligence Processes

New Rosedale operates by principles which have not yet been formulated into policy(s). NR Feedmill and Cana-Lix have the following policies and due diligence procedures in place to mitigate the risk of child

labour and forced labour within internal activities and its supply chain:

Internal Policies

Occupational Health and Safety Policy and Procedures Manual

NR Feedmill and Cana-Lix have established a Health and Safety Policy and Procedures Manual. The purpose of the manual is to guide and direct all working individuals on practices for workers' safety and injury prevention. NR Feedmill and Cana-Lix are committed to providing all necessary training and instruction to workers, ensuring that appropriate work practices are followed while on duty. Workers are encouraged to report all injuries, near misses or potential hazards to their supervisors. All incidents that result in injury or property damage or could have resulted in injury or property damage are investigated thoroughly by NR Feedmill and Cana-Lix.

This manual also states worker's rights to refuse work, should they believe the working conditions are unusually dangerous or unsafe. This manual is reviewed annually.

PPE Guidelines

The Personal Protective Equipment Guidelines specify NR Feedmill and Cana-Lix's responsibility to provide a safe and healthy working environment for all workers. These guidelines follow the Occupational Safety and Health Administration practices, therefore requiring employers to protect their employees from workplace hazards that can cause injury.

These guidelines specify the responsibilities of NR Feedmill and Cana-Lix as well as workers, regarding health and safety. NR Feedmill and Cana-Lix's requirements for the types of personal protective equipment are also identified within the guidelines.

Safety Plan

The Safety Plan applies to NR Feedmill and Cana-Lix workers, including drivers operating equipment. The objective of this plan is to educate and promote carrier compliance, as well as adherence to safety policies, regulations and laws pertaining to the transportation of people and goods.

This Safety Plan identifies NR Feedmill and Cana-Lix drivers' reporting requirements, should an accident or violation arise. Rules regarding drivers' hours of service are specified within this plan, including defining mandatory rest and maximum driving hours allowed. Drivers are expected to maintain driving logs, which NR Feedmill and Cana-Lix monitor to ensure compliance with the applicable hours of service regulations. NR Feedmill and Cana-Lix follow the Provincial Driver's Hours and Federal Commercial Vehicle Driver Hours Regulations to set guidelines for drivers.

Due Diligence Processes

Supplier Approval Form

All new NR Feedmill and Cana-Lix suppliers are required to complete a Supplier Approval Form at the time of onboarding. This form is being updated to incorporate content specific to this Act. Suppliers will be required to attest that goods supplied to NR Feedmill and Cana-Lix not involve forced or child labour and that the supplier is in compliance with this Act.

This form will also be updated to require suppliers to state the country of origin for goods provided to



NR Feedmill and Cana-Lix, provide information if they have a Supplier Approval Program, and provide information regarding training provided to their employees.

Supplier Approval Risk Assessment

As part of NR Feedmill's supplier due diligence, a risk assessment is now being performed of new vendors. This risk assessment recently incorporated assessing suppliers on compliance with this Act, if applicable. It also assesses factors related to product quality and the experience of vendors, as well as the expected volume of products to be ordered and the expected frequency of interactions with the new supplier.

Supply Chain Risk Assessment

A risk assessment of operations, goods procured, and the countries goods are procured from has been performed over material direct suppliers. For the purposes of this report, material suppliers are defined as those who account for at least 1% or more of the total procurement spend during the fiscal year.

This risk assessment uses two separate indices to conclude on the inherent risk of child and/or forced labour related to the Entities' industries of operation, goods procured, and countries goods are procured from. The two indices are Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.

New Rosedale Colony Farms Ltd.

Industry of Operation

New Rosedale Farms operates within the agriculture industry. The two indices noted above have identified an inherent risk exposure within this industry.

Country Which Goods are Procured From

For the purposes of this assessment, a review of countries which goods are procured from focused on the location of direct supplier's operations. Each direct material supplier is located within Canada which has been identified as having a low-risk exposure to forced and/or child labour.

Goods Procured

As described in the previous section, the goods procured within New Rosedale Farms' supply chain are divided into the categories of crop, hog, poultry and general farm operations. A risk assessment over goods within these categories has been conducted and identified an initial inherent risk of forced and/or child labour among the following goods:

1. Crops: Corn, wheat, cereal grains and pulses (legumes);
2. Hogs;
3. Poultry; and
4. Cattle.

All other remaining goods were not identified within the two indices, therefore concluding a low-inherent risk exists.

New Rosedale Feedmill Ltd. and Canada Lick Blocks Ltd.

Industry of Operation

NR Feedmill and Cana-Lix operate within the manufacturing industry. Based on the two indices referenced above, this industry has an inherent risk exposure to child labour and forced labour.

Country Which Goods are Procured From

For the purposes of this assessment, a review of countries which goods are procured from focuses on the location of direct suppliers operations. Each direct material supplier is located within Canada and the United States. These countries have been identified as having a low-risk exposure to forced and/or child labour per the two indices.

Goods Procured

As described in the previous section, the goods procured by NR Feedmill and Cana-Lix are divided into the categories of feed ingredients, grains and proteins, lick tubs and supplies, and general equipment. A risk assessment of goods within these categories has been conducted and identified an initial inherent risk of forced and/or child labour among the products of corn, cereal grain and pulses (legumes).

All other remaining goods were not identified within the two indices, therefore concluding a low-inherent risk exists.

Remediation of Forced & Child Labour

To mitigate the risk of child labour and forced labour within supply chains, New Rosedale will incorporate the following mechanisms for supplier due diligence:

Supplier Approval Form

NR Feedmill and Cana-Lix to require all new suppliers to complete the Supplier Approval Form. An aspect of this form requires suppliers to state their compliance with this Act, where applicable, and explicitly state the country of origin of where procured goods originate from. NR Feedmill and Cana-Lix is in the process of evaluating existing suppliers using this form.

Supplier Approval Risk Assessment

When conducting due diligence procedures for new suppliers, NR Feedmill and Cana-Lix conducts a risk assessment. This exercise evaluates the supplier's compliance with this Act, where applicable, as well as other factors regarding product quality and frequency of orders.

NR Feedmill and Cana-Lix understand the value of discussing these risks with members, employees and suppliers. These conversations will continue to bring awareness to this issue in an effort to remediate the risk within their activities and supply chains.

Remediation of Vulnerable Family Income Loss

New Rosedale is in the process of understanding and evaluating their supply chains related to the risk of

child labour and forced labour. To date, New Rosedale has not identified instances of the use of child labour or forced labour within their operations or those of suppliers. New Rosedale will continue to review procurement practices to enhance the rigor of due diligence processes including raising awareness with suppliers.

Awareness Training

There is currently no training in place within New Rosedale on the topic of child labour or forced labour. However, training is provided to members and employees regarding workplace safety including heavy equipment training and animal care/handling training as per Manitoba Pork Guidelines.

As part of the HACCP certification, NR Feedmill is required to provide ongoing training to employees regarding topics such as feed safety, emergency planning and hazard analysis. To fulfill this requirement, NR Feedmill maintains a Personnel Training Standard Operating Procedure ("SOP"). This SOP is the responsibility of the HACCP Coordinator. To verify this SOP's effectiveness, the HACCP Coordinator trains and observes all operators at NR Feedmill annually, completing a personnel evaluation form for each trained individual.

New Rosedale recognizes the opportunity to enhance training relevant to this Act and therefore, will be evaluating applicable training for members and employees in the foreseeable future.

Assessing Effectiveness

To mitigate the risk of child labour and forced labour, the following mechanisms are in place relevant to assessing effectiveness:

Internal Activities

1. Routine policy reviews: New Rosedale has committed to reviewing and updating policies to ensure relevance and accuracy based on the current operating conditions in accordance with this Act.
2. Safety training: To maintain the HACCP certification, NR Feedmill provides annual safety training to workers, reviewing topics such as feed safety, emergency planning, and hazard analysis. The HACCP Coordinator oversees this process, ensuring annual training is conducted, and proof of training is maintained through evaluation forms.
3. Incident reporting: NR Feedmill and Cana-Lix has documented protocols for reporting incidents, accidents, and close calls. All incidents that result in injury or property damage, or could have resulted in injury or property damage are investigated thoroughly, therefore emphasizing NR Feedmill's commitment to workers safety.

Supplier Activities

1. Supplier Approval Form: Through the use of the Supplier Approval Form, all new suppliers of NR Feedmill and Cana-Lix are required to attest their compliance with this Act, if applicable. NR Feedmill is in the process of completing these forms for existing suppliers. This process allows NR

Feedmill to better understand their suppliers in evaluating risks related to this Act.

2. **Supplier Approval Risk Assessment:** For each new supplier, NR Feedmill and Cana-Lix perform a risk assessment, evaluating a variety of factors, including compliance with this Act, if applicable. NR Feedmill is in the process of completing these forms for existing suppliers. This assessment allows NR Feedmill to better understand their suppliers in evaluating risks related to this Act.


Steps Taken to Prevent & Reduce Risk of Child Labour or Forced Labour

New Rosedale has taken the following steps to prevent and reduce the risk of child labour or forced labour within their activities and supply chain:

1. **Mapping activities:** As part of this report, New Rosedale has mapped their activities to complete an initial risk assessment to align with the Act.
2. **Mapping supply chains:** As part of this report, New Rosedale has mapped their supply chains to complete an initial risk assessment to align with the Act.
3. **Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains:** As part of this report, New Rosedale has identified risks within their activities and supply chains that have inherent risks of child labour and/or forced labour.
4. **Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains:** Through the use of the Supplier Approval Form and Supplier Approval Risk Assessment, NR Feedmill and Cana-Lix are in the process of identifying risks related to this Act among suppliers.
5. **Developing and implementing training and awareness materials on forced labour and/or child labour:** New Rosedale has identified the opportunity to implement training content related to this Act for employees.

Attestation

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 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.

Stanley Baer	
Full Name	Signature
Mill GM	May 31 2024
Title	Date

I have the authority to bind New Rosedale Colony of Hutterian Brethren, New Rosedale Colony Farms Ltd., New Rosedale Feedmill Ltd., and Canada Lick Blocks Ltd.