



Northern Gold Foods Ltd. Supply Chains Act Annual Report 2023

Structure, Activities, and Supply Chains

Northern Gold Foods Ltd. (NGFL), is a privately held corporation conducting business in Canada with locations in Port Coquitlam, British Columbia and Welland, Ontario.

NGFL is a manufacturer of a variety of ready-to-eat cereals and snack bars as well as intermediary ingredients used for further processing. NGFL sells its products on a wholesale basis in Canada and the US.

In the conduct of its business, NGFL has developed several core supply chains.

- Raw materials are sourced directly from producers in North America or from aggregating third-party suppliers, such as brokers, located in North America.
- Packaging materials such as flexible film, cardboard cartons, corrugated boxes, plastic liners, etc. are sourced from multiple suppliers in North America.
- Food processing and packaging equipment is sourced from multiple suppliers in North America and Europe.
- Equipment parts, repair and maintenance components, and consumable supplies used in production such as printing ink, labels, adhesives, etc. are sourced from multiple suppliers in North America.
- Shipping supplies such as pallets, cardboard slip sheets and corner posts, stretch wrap, etc. are sourced from multiple suppliers in North America.

Policies and Due Diligence

NGFL maintains a Code of Conduct Policy wherein the use of child labour or forced labour is expressly prohibited.

Risk Assessment

- NGFL recognizes a risk of child labour or forced labour in its raw materials supply chain, that being products grown or sourced by food brokers and distributors outside North America.
- NGFL does not perceive high risk in the remainder of its supply chains.

Remediation Measures

All of NGFL's suppliers undergo a vendor assessment and approval process in order to better understand the materials used, primarily in respect of food safety.



NGFL plans to incorporate a human rights component to its vendor assessment process, specifically to address child labour or forced labour in its supply chain.

Assessing Effectiveness

NGFL is a certified Sedex member, engaging the third-party Sedex organization and platform to transparently create a more socially and environmentally sustainable supply chain. NGFL has undergone several Sedex Members Ethical Trade Audit (SMETA) third-party audits designed to assess and continuously improve in the areas of sustainability and social responsibility.

Remediation of Loss of Income

NGFL has not encountered human rights violations in its supply chain. Therefore, to date no corrective action has been necessary, nor any remediation of loss of income.

Training

Employee awareness of NGFL's stance on child labour and forced labour is by way of distribution of current versions of both the Code of Conduct Policy and Business Ethics Policy.

Approval

On behalf of Northern Gold Food Ltd., I attest to the accuracy of this report and have the legal authority to bind the corporation,

A handwritten signature in blue ink, appearing to be "HS", is written above a horizontal line.

Date: May 24, 2024

Howard Siemens
Controller
Northern Gold Foods Ltd.