

May 29, 2024

Hon. Dominic LeBlanc  
Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs  
Public Safety Canada  
Government of Canada  
Ottawa, ON  
K1A 0P3

**Letter of Attestation for Bill S-211 *Fighting Against Forced Labour and Child Labour in Supply Chains Act***

Dear Minister LeBlanc:

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 Ocean Choice International (Business Number: 851568618) and its subsidiaries listed below:

<b>Name</b>	<b>Business Number</b>
Ocean Choice (2017) International	855413001
Katsheshuk Fisheries Inc.	899808117
Ocean Choice Holdings Inc.	864365796
55104 Newfoundland & Labrador Inc.	825224769

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 prior fiscal year (2023).

I declare that the above statements are true and accurate to the best of my knowledge, information, and belief. I have the authority to bind Ocean Choice International.

Respectfully submitted,

**OCEAN CHOICE INTERNATIONAL**



Martin Sullivan  
Chief Executive Officer



Blaine Sullivan  
President

## Report on Forced Labour and Child Labour in Supply Chains Annual Report year ended December 31, 2023

This report is prepared in accordance with the Annual Report requirements set out in Section (11) in *Bill S-211 - An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

### 1. Annual Report

Ocean Choice International (OCI) has a commitment to maintaining the integrity of our Company. The manner in which we as an organization go about conducting business and how we treat others in our work, both here at home and around the globe, define how the Company is viewed within our community and to the rest of the world. It is important for everyone involved with the Company – from our employees, our customers, and our suppliers, as well as the community in which we operate – that OCI be known for its high standards of business conduct and the integrity of its employees.

During the year ended December 2023, OCI took the following measure to prevent and reduce the risk of forced and/or child labour in its supply chain:

- OCI had several policies in place throughout the year which outlined the Company's expectations regarding our commitment to ethical conduct. These policies included:
  - Code of Conduct
  - Mission and Philosophy
  - Affirmation of Human Rights
  - Ethical Trading Policy
  - Ethics and Business Practices
  - Trade Sanctions Policy
  - Whistle Blower Policy
  - Occupational Health and Safety
  - Harassment Policy
  - Contractor Policy
  - Workplace Inspection Policy
  - Violence Prevention Policy
  
- OCI created a new policy on Child and/or Forced Labour as well and conducted a review and updated other policies with respect to the new requirements related to the *Act*. These policies include:
  - Supplier Code of Conduct Policy (New)
  - Forced and Child Labour in Supply Chain Policy (New)
  - Ethical Trading Policy (Revision)

- OCI distributed a Supply Chain Questionnaire to all its suppliers in an effort to collect environmental, social and governance (ESG) data from its suppliers. There was a direction question on child and/or forced labour.
- OCI developed and conducted a corporate wide training module focused on child and/or forced labour. This was a mandatory requirement for all current and new employees, and it is now part of our onboarding procedures and annual employee orientation for seasonal employees.

## 2. Single or Joint Report

This report is prepared by Ocean Choice International and for its various subsidiaries and operations including:

- Ocean Choice (2017) International
- Katsheshuk Fisheries Inc.
- Ocean Choice Holdings Inc.
- 55104 Newfoundland & Labrador Inc.

## 3. Supplementary Information

OCI provides the following response the various categories for supplementary information related to the *Act*.

### (a) Structure, Activities and Supply Chain

Ocean Choice is a family-owned and operated Newfoundland and Labrador seafood company. The company employs approximately 1,500 people from over 300 communities throughout the province. Ocean Choice operates fish processing plants and offshore fishing vessels, and it sources seafood from over 1,900 independent fish harvesters from across Newfoundland and Labrador. Ocean Choice has a strong global presence, with international sales offices around the world. For further information about the company, visit: [www.oceanchoice.com](http://www.oceanchoice.com)

### (b) Policies and Due Diligence Process in Relation to Bill S-211

OCI took the below steps to prevent and reduce the risk of forced labour and child labour in its supply chain.

- An internal committee was formed to ensure that OCI was compliant with the Bill S-211, *Fighting Against Forced Labour and Child Labour in Supply Chain*, the Act. The purpose of the committee was to review the Act and OCI's compliance.

- Committee members participated in third party training and information sessions on the Act.
- In an effort to collect environmental, social and governance's data from its suppliers OCI emails all its supply chain customers and requested they complete a questionnaire to document each company's performance against OCI's – Code of Business Conduct including: (i) business ethics, (ii) respect to workers protection; (iii) child and/or forced labour; (iv) respect for our environment; and (v) sustainability and social responsibility.
- OCI response from our Supply Chain Questionnaire resulted in our supplier's providing confirmation and/or verification they are not engaging in forced labour or child labour themselves or in their supply chains, committing to conducting due diligence to assess and mitigate risks of forced labour and child labour within their supply chains, and committing to the promotion of human rights, ethical business conduct, and sustainable supply chain practices.
- OCI corporate policies and procedures are an essential guide to assist in the coordination of the activities of all employees to achieve excellence. Respect for human rights is fundamental to the success of OCI, our subsidiaries and the communities where we operate. OCI's Code of Conduct was in place throughout the year and continues to support OCI's commitment to ethical conduct. In response to the Act OCI has reviewed, updated, and developed new policies including the following:
  - Ethical Trading Policy – Updated
  - Supplier Code of Conduct – New Policy
  - Forced and Child Labour in Supply Chain – New Policy
- OCI conducted a corporate wide training module; whereby all employees are required to complete a "Supply Chain – Child & Forced Labour Policy" training which is scored and tracked annually. OCI has also adjusted its orientation and onboard training to include a component on Child & Forced Labour.
- OCI has a landing page on its corporate website dedicated to compliance of *Bill S-211 - An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

**(c) Parts of business and supply chain that carry a risk of Forced and/or Child Labour and steps taken to assess and manage risk**

OCI has commenced an internal review process of its supply chain and to date has not identified any issues with current suppliers.

OCI has sought to collect environmental, social and governance (ESG) data from its suppliers to inform the company's decision-making, improve its reporting and to

better identify risks and opportunities across its supply chain. This questionnaire included a section on forced and/or child labour.

OCI does have policies in place whereby confidential reporting through our Whistler Blower Policy, our Supplier Code of Conduct and our Ethics and Business Practices for any issues including child and/or forced labour.

**(d) Measures takes to remediate any forced and/or child labour**

OCI has not identified any forced and/or child labour within our operations or our supply chain.

OCI does have policies in place whereby confidential reporting through our Whistler Blower Policy, our Supplier Code of Conduct and our Ethics and Business Practices for any issues including child and/or forced labour.

**(e) Measures take to remediate the loss of income to the most vulnerable families that results from any measure take to eliminate the use of child and/or forced labour in supply chain**

As previously noted, OCI has not identified any forced and/or child labour within our operations or our supply chain.

**(f) Training provided to employees**

Committee members participated in third party training and information sessions on *The Act*

OCI had conducted a corporate wide training module; whereby all employees are required to complete a "Supply Chain – Child & Forced Labour Policy" training which is scored and tracked annually. OCI has also adjusted its orientation and onboard training to include a component on Child & Forced Labour.

**(g) Assessment of effectiveness in ensuring forced and/or child labour are not used in supply chain**

OCI has not identified issues in relation to child and/or forced labour.

OCI will continue its processes and due diligence efforts in conducting annual reviews of its supply chain that will include the following:

- Policy Review
  - Appropriate workplace conduct (anti-discrimination, harassment, etc.)
  - Compliance with child labour and/or forced labour laws

- Controls, policies or procedures to identify and prohibit child and/or forced labour in our operations and supply chain.
- Vet Existing Suppliers
- Train our workforce and suppliers
- Map our supply chain to:
  - Identify force labour risks and identify adequate solutions
  - Build in time for gradual reduction and system refinement
  - Third-party audits/certifications
- Encourage Transparency
  - Appropriate monitoring and compliance processes
  - Screening suppliers during onboarding

OCI is committed to requiring its suppliers to comply with the supply chain working conditions as set out in its Supplier Code of Conduct.

Attached to this report please find the following new policies: (i) Supplier Code of Conduct, (ii) Forced and Child Labour in Supply Chain as well as the companies updated (iii) Ethical Trading Policy.

Respectfully submitted.

#### Attachments (3)

- Supplier Code of Conduct Policy
- Forced and Child Labour in Supply Chain Policy
- Ethical Trading Policy

## PURPOSE

Ocean Choice International (Ocean Choice) are determined to carry out their activities lawfully and ethically by adopting responsible social and environmental practices and supply chain is a critical component of the Company's business life and play a key roll in its success.

Ocean Choice actively seeks to conduct business with suppliers that share the Company's commitment to its environmental, social and governance (ESG) practices.

## SCOPE

The Supplier Code of Conduct is aimed at all Ocean Choice suppliers of goods and services.

## POLICY

Ocean Choice expects it suppliers to take every measure to adopt behaviours and practices that are in line with the principles set out in its Supplier Code of Conduct and to demonstrate they are in compliance.

Ocean Choice will apply its Supplier Code of Conduct in a targeted manner based on the specific issues associated with the different types of products and services purchased by Ocean Choice. These principles are in addition Ocean Choice's supplier selection criteria (e.g. price, quality and availability).

All Suppliers are expected to manage their commercial operations according to the most stringent standards of ethical business, integrity and equity.

Ocean Choice expects its Suppliers to:

- Comply with all applicable laws, regulations and guidelines.
- Refrain from engaging in any form of corrupt practice, including extortion and fraud.
- Ensure the protection of the confidential and personal information they receive from Ocean Choice and only use this information as part of their business with Ocean Choice.
- Comply with intellectual property rights relating to the products and services thy provide to Ocean Choice.
- Divulge all actual and potential conflicts of interest to Ocean Choice.
- Disclose to Ocean Choice any behaviour deemed unethical by any Ocean Choice employee.

## RESPECT FOR WORKERS

The principles of the Supplier Code of Conduct cover all the workers in Ocean Choice's supply chain, regardless of their status (seasonal, casual, part-time, full-time; local or migrant). Particular emphases is placed on the work conditions of more vulnerable workers.

Ocean Choice expects suppliers to provide products and services that are based on practices that ensure that workers are treated with dignity, respect and equity in a healthy and safe work environment that provide decent conditions and is free of abuse.

Ocean Choice expects suppliers comply with labour laws and regulations that apply in the jurisdiction in which they operate. In jurisdictions where laws do not exist Ocean Choice expects its suppliers' practices ensure the respect and protection of its worker in the supply chain.

Ocean Choice expects its suppliers to recognize the United Nations International Labour Organization. The Company also expects its suppliers to adhere to the following principles and standards:

- Refrain from the use of child and force labour.
- Freedom of association and the right to collective bargaining
- Discrimination in employment
- Occupational health and safety standards and practices
- Work hours, e.g. comply with national laws and/or international standards
- Wages and benefits – employee shall be paid according to legal wage or collective agreement, if applicable

**ENVIRONMENTAL PROTECTION**

Ocean Choice endeavours to purchase goods and services from suppliers that are respectful of the environment and which aim to reduce their environmental footprint. Ocean Choice suppliers must give priority to environmental issues and implement initiatives to foster sound environmental management through practices that prevent pollution and preserve resources.

Ocean Choice expect suppliers to comply with the environmental laws that apply in the jurisdiction/county in which they operate.

Ocean Choice encourages suppliers to adopt a proactive approach with regard to significant issues in the supply chain with a focus on the following:

- Greenhouse gas emissions (GHC)
- Water conservation and minimization of release of pollutants into water.
- Soils, biodiversity and ecosystems to adopt practices to maintain soil, biodiversity and ecosystem quality.
- Respect for animal health and welfare, e.g. suppliers are expected to refer to science-based standards recognized by the industry.

## PURPOSE

Ocean Choice International (Ocean Choice) are determined to carry out their activities lawfully and ethically by adopting responsible social and environmental practices and supply chain is a critical component of the Company's business life and play a key roll in its success.

Ocean Choice actively seeks to conduct business with suppliers that share the Company's commitment to its environmental, social and governance (ESG) practices.

## SCOPE

The Supplier Code of Conduct is aimed at all Ocean Choice suppliers of goods and services.

## POLICY

Ocean Choice expects it suppliers to take every measure to adopt behaviours and practices that are in line with the principles set out in its Supplier Code of Conduct and to demonstrate they are in compliance.

Ocean Choice will apply its Supplier Code of Conduct in a targeted manner based on the specific issues associated with the different types of products and services purchased by Ocean Choice. These principles are in addition Ocean Choice's supplier selection criteria (e.g. price, quality and availability).

All Suppliers are expected to manage their commercial operations according to the most stringent standards of ethical business, integrity and equity.

Ocean Choice expects its Suppliers to:

- Comply with all applicable laws, regulations and guidelines.
- Refrain from engaging in any form of corrupt practice, including extortion and fraud.
- Ensure the protection of the confidential and personal information they receive from Ocean Choice and only use this information as part of their business with Ocean Choice.
- Comply with intellectual property rights relating to the products and services thy provide to Ocean Choice.
- Divulge all actual and potential conflicts of interest to Ocean Choice.
- Disclose to Ocean Choice any behaviour deemed unethical by any Ocean Choice employee.

## RESPECT FOR WORKERS

The principles of the Supplier Code of Conduct cover all the workers in Ocean Choice's supply chain, regardless of their status (seasonal, casual, part-time, full-time; local or migrant). Particular emphases is placed on the work conditions of more vulnerable workers.

Ocean Choice expects suppliers to provide products and services that are based on practices that ensure that workers are treated with dignity, respect and equity in a healthy and safe work environment that provide decent conditions and is free of abuse.

Ocean Choice expects suppliers comply with labour laws and regulations that apply in the jurisdiction in which they operate. In jurisdictions where laws do not exist Ocean Choice expects its suppliers' practices ensure the respect and protection of its worker in the supply chain.

Ocean Choice expects its suppliers to recognize the United Nations International Labour Organization. The Company also expects its suppliers to adhere to the following principles and standards:

- Refrain from the use of child and force labour.
- Freedom of association and the right to collective bargaining
- Discrimination in employment
- Occupational health and safety standards and practices
- Work hours, e.g. comply with national laws and/or international standards
- Wages and benefits – employee shall be paid according to legal wage or collective agreement, if applicable

## ENVIRONMENTAL PROTECTION

Ocean Choice endeavours to purchase goods and services from suppliers that are respectful of the environment and which aim to reduce their environmental footprint. Ocean Choice suppliers must give priority to environmental issues and implement initiatives to foster sound environmental management through practices that prevent pollution and preserve resources.

Ocean Choice expect suppliers to comply with the environmental laws that apply in the jurisdiction/country in which they operate.

Ocean Choice encourages suppliers to adopt a proactive approach with regard to significant issues in the supply chain with a focus on the following:

- Greenhouse gas emissions (GHC)
- Water conservation and minimization of release of pollutants into water.
- Soils, biodiversity and ecosystems to adopt practices to maintain soil, biodiversity and ecosystem quality.
- Respect for animal health and welfare, e.g. suppliers are expected to refer to science-based standards recognized by the industry.

**REPONSIBILITY**

It is the responsibility of all managers to ensure that Ocean Choices suppliers adhere to the companies Supplier Code of Conduct as well as its Business Code of Conduct. These Codes are an integral part of the business practices that govern Ocean Choice's relations with its suppliers. Ocean Choice bases compliance and application of its Supplier Code of Conduct on a thorough, transparent, collaborative and continuous improvement approach with suppliers.

To ensure compliance and application of the Supplier Code of Conduct, the Company reserves the right to follow up with direct and indirect supplies through a range of implementation tools such as:

- Supplier self-assessment questionnaires
- Continuous improvement programs
- Audits by Ocean Choice or third parties

Ocean Choice encourages its suppliers to implement policies and standards, codes of conduct and/or management processes that account for the principles set of the Companies Supplier Code of Conduct. Ocean Choice considers it to be the responsibility of suppliers to comply with the principles set out in the Supplier Code of Conduct across their supply chains and carry out relevant follow-up with their own suppliers.

The practices adopted by the Companies suppliers must be verifiable and supplies must be able to provide documents attesting to their compliance with the Supplier Code of Conduct upon the Company's request.

Ocean Choice encourages its suppliers to inform the company of measures taken to enhance their corporate practices and to advise Ocean Choice of any obstacles that prevents execution of Ocean Choice's Supplier Code of Conduct.

**Non-Compliance**

Ocean Choice reserves the right to request its Suppliers to implement corrective actions to comply with this Supplier Code of Conduct. In the case of a serious failure to comply Ocean Choice may reconsider its business relationship with the supplier.

## PURPOSE

- The Forced and Child Labour Policy is based on Ocean Choice's commitment to find practical, meaningful and culturally appropriate responses to support the elimination of such labour practices. It has been formulated in consideration of the *Fighting Against Forced labour and Child Labour in Supply Chains Act*, Bill S-211 in Canada. It endorses the need for appropriate initiatives to eliminate these abuses.

## SCOPE

- Ocean Choice prohibits the use of child and forced labour in all its divisions.
- We shall adopt strict compliance with all relevant local and international laws and standards in respect to child and forced labour.
- We do not engage any child labour on site and in our supply chain.
- A system of checking and maintaining records of workers at the time of employment, to determine proof of age is in place and monitored on a regular basis.
- Mechanisms are in place to create awareness and challenges about child rights and the prohibition of child labour, and to communicate the issues/development/challenges to the entire supply chain and the community.

## RESPONSIBILITY

- The implementation of this policy is the responsibility of the of the managers and supervisor and senior management team throughout the Company.
- This policy is publicly available throughout the Company and is clearly communicated to all employees in a manner in which it can be understood through orientation programs and policy manuals.

## GENERAL

- There is zero tolerance towards the breach of child and/or forced labour.
- Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at all divisions and are open to verification by any authorized personnel or statutory body.



## **FORCED AND CHILD LABOUR IN SUPPLY CHAIN POLICY**

**CO.018**

- Ocean Choice's Code of Business requires all directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.
- The various divisions of the Company provide annual reports on all reported, if any, incidents of child and/or forced labour to the Human Resources/Personnel Department, or the Senior Management Team.
- Periodic assessment of this policy is conducted by the Chief Financial Officer on an annual basis.
- Ocean Choice will require its suppliers to complete an annual questionnaire with respect to social and governance issues in relation to Bill S-211.

Issue Date: Jan 31, 2024  
Revision Date:

Forced and Child Labour in Supply Chain

Page 2 or 2

## PURPOSE

To ensure that all products accepted by Ocean Choice meet the ethics standards set by the Company.

## POLICY

Ocean Choice International is committed to ethical best practices in all of our activities. Ocean Choice will never knowingly accept products from suppliers who exploit the people or natural resources of their environment.

The standards for ethical best practices are as follows:

### **1. Work Conditions are Safe & Hygienic:**

- Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonable and practicable, the cause of hazards inherent in the working environment.
- Workers shall receive appropriate safety training as related to their responsibilities.
- Workers shall be made aware of the right and legal obligation to refuse work in an unsafe environment with no fear of reprimand.
- Workers shall have an active health and safety committee comprising of volunteer employees and the guidelines of government officials to ensure compliance.
- Workers shall have free access to clean toilet facilities, potable water, and sanitary facilities for food storage.

### **2. Employment is Chosen Freely:**

- There shall be no forced, bonded, or involuntary prison labor.
- Workers are free to leave their employer after reasonable notice.
- Ocean Choice prohibits the use of child labour and forced labour.
- Ocean Choice complies with all relevant local and international laws and standards with respect to child and forced labour.

### **3. Freedom of Association and the Right to Collective Bargaining is Respected:**

- Workers have the right to join or form a trade union of their own choosing and to bargain collectively.
- The employer has an open attitude towards the activities of the union and their activities.

- Union representatives are not discriminated against and are free to carry out the functions associated with union activities.

#### 4. Living Wages are Paid:

- Employee wages and benefits are paid for a standard working week at a level associated with a national standard.
- All employees shall be made fully aware of and understand their employment condition (wages, benefits, hours of work, pay period).
- Garnishment of wages as a disciplinary action is not permitted.

#### 5. Hours of Work:

- Hours of Work shall comply with national laws and industry standards.

#### 6. Discrimination is Not Tolerated:

- No employee shall be discriminated against in hiring, compensation, and access to training, promotion, termination, or retirement based on race, creed, color, religious affiliation, gender identity, sexual orientation, marital status, or political affiliation.

#### 7. Inhumane Treatment is Not Permitted:

- No employee shall be subject to physical or emotional abuse or discipline, or other harassment or forms of intimidation.