



Oxford Cattle Company Ltd.

Forced Labour and Child Labour in Supply Chains Company
Assessment



Attention: John Ysselstein
Oxford Cattle Company Ltd.
445140 Gunn's Hill Road
Woodstock, ON N4S 7V8

Re: Assessment of Forced Labour and/or Child Labour in Supply Chains

Dear John,

Enclosed is the final report for the assessment of Forced Labour and/or Child Labour in Supply Chains of Oxford Cattle Company Ltd. ("the Company"). The intent of this report is to provide an evaluation of the Company's current state, in response to the reporting criteria of Canada's 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 Bill" or "Bill"). This engagement evaluates all reporting criteria under this Bill. Reporting under this Bill is the Company's responsibility, and due on or before May 31 of each year, beginning in 2024. This report must be approved by the governing body of the Company.

This report also identifies opportunities for the Company to enhance controls and activities related to Forced Labour and Child Labour within the organization and supply chains. These include:

- Employee Code of Conduct: It is recommended that an employee code of conduct, including expectations of the Entity regarding behaviour, working conditions, and the intolerance for the use of child labour and/or forced labour be developed. When implemented, it is recommended that employees sign off on the employee handbook annually to reflect their adherence.
- Enhancement of Internal Policies: It is recommended that content related to this Act be integrated within existing internal policies. Also, it is recommended that employees sign off on these policies annually to reflect their understanding and adherence to expectations.
- Employee Training: It is recommended that employee training on the topic of child labour and forced labour be implemented into existing employee training.
- Supplier Due Diligence: It is recommended that supplier due diligence mechanisms be an area of focus for the Entity moving into the second year of compliance reporting for this Act. Should specific examples or guidance on these exercises and tools be requested, we would be more than happy to assist the Entity in their development.

We wish to express our sincere thanks to the staff of Oxford Cattle Company Ltd. for their assistance during the completion of this assessment. Should you have any questions regarding the content of our report, please report, please do not hesitate to contact me at (780) 969.1475.

Regards,

Nicole Asselin
Partner, Consulting
Nicole.Asselin@mnp.ca

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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.

These measures introduced through former 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 steps 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 Oxford Cattle Company Ltd. (“Oxford Cattle”, “Entity”) response to 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), sections 11(1) and 11(3).

Oxford Cattle satisfies the definition of an Entity within the Act by having a place of business in Canada, doing business in Canada, having assets in Canada and meeting both the revenue and asset thresholds.

The financial reporting year of Oxford Cattle covered by this report is August 1, 2022 to July 31, 2023.

Structure, Activities & Supply Chain

Oxford Cattle operates as a corporation (Business Number 822888707) located at 445140 Gunn’s Hill Road, Woodstock, Ontario, N4S 7V8.

Oxford Cattle operates within the agriculture industry, operating a feed yard in Canada for raising cattle until size specifications are met to sell to finishing yards or for slaughtering and/or being put into meat markets. The Entity also ensures that animal welfare is kept top priority by monitoring feed and water intake, and ensuring veterinary assistance is given when appropriate.

Oxford Cattle buys Canadian cattle as well as cattle from the United States, primarily as calves. The cattle are fed until they meet the size specifications for sale. Once size specifications are met, the Canadian cattle are sold to finishing yards in Canada or for slaughtering and/or being put into meat markets within Canada. In addition to the cattle cared for at its feed yard in Ontario, some of Oxford Cattle’s Canadian cattle are cared for by hired feed yards in Saskatchewan and Quebec. Cattle purchased from the United States are fed by feed yard service providers in the United States until they meet the size specifications for sale. Most of the cattle that the Entity purchases and have fed in the United States are imported into Canada and sold to finishing yards in Canada.

The Entity procures cattle directly from farmers or through brokers. These purchases are made through Canadian suppliers and suppliers from the United States.

Oxford Cattle purchases and grows crops and feed to feed livestock in its care in Canada. Crops are harvested on Oxford Cattle farmland and used as feed for cattle within its feed yard. The crops used as feed include brewers’ grain (barley), corn, grass, haylage, and silage.

Feed yard procurement also includes the provision of veterinary supplies and care for the animals. The Entity’s feed yard needs for veterinary supplies and services for cattle are purchased from a local veterinarian for cattle in Canada. Oxford Cattle’s veterinary needs in the United States are fulfilled by American service providers.

See Figure 1 for a breakdown of procurement spend across all activities, during the fiscal year.

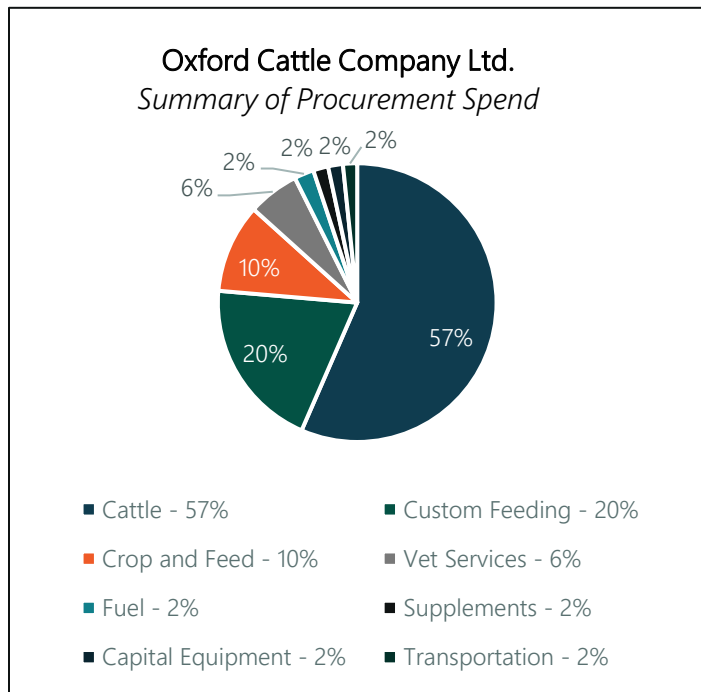


Figure 1: Summary of Procurement Spend

Policies & Due Diligence

Oxford Cattle has the following policies and due diligence procedures in place to mitigate the risk of child labour and forced labour within internal activities and their supply chain:

Internal Policies and Documents

Workplace Harassment and Violence Policy

The Workplace Harassment and Violence Policy includes the behavioural expectations of employees and their rights and responsibilities. This policy indicates zero-tolerance for abuse of any form within the workplace. This policy applies at every level of the organization and, to every aspect of the employer-employee relationship. The policy document indicates that any perceived or real incidents is to be reported to a member of Oxford Cattle's management team who will then investigate and manage the resolution of incidents. Though forced labour and/or child labour are not explicitly stated within the document, aspects and clauses of the document speak directly to the treatment and behaviour of employees.

Health and Safety Policy

Oxford Cattle's Health and Safety Policy indicates an overarching commitment to protect its employees and to provide a healthy and safe work environment. The policy also states that all levels of employees are actively responsible and accountable for each other's safety. Management and supervisors are expected to set examples, expectations, and communicate safe work practices including employee training and the use of appropriate equipment to perform work tasks. Though forced labour and/or child labour are not explicitly stated within the document, aspects and clauses of the document speak directly to the treatment and behaviour of employees.

Due Diligence Processes

New Employee Onboarding

When hiring a new employee, the Entity provides an onboarding process, which includes reviewing the policies mentioned above. New employees must sign the policies at the time of onboarding or when a change is made to reflect understanding and adherence.

New Employee Hiring Process

When the Entity is interviewing potential employees for hiring, part of their due diligence process is reviewing government-issued identification. This process verifies the identity and birthdate of the applicant and is retained in their employee file.

Employment Contracts

Where employees are hired on a temporary/contract basis or for senior roles within the Entity, the Entity requires an employment contract to be signed by the individual. This contract states that the Entity's policies and procedures will be adhered to throughout the duration of their employment. The contract also states the individuals' rights and responsibilities including that they must be paid a minimum salary

wage and other provisions where applicable.

Incident Reporting

The Workplace Harassment and Violence Policy has a mechanism in place for employees to confidentially report any perceived or real incidents regarding workplace harassment and violence to a member of the Entity's management team.

Joint Health and Safety Committee

The Entity has a Joint Health and Safety Committee and an appointed Health & Safety Representative who work with management and employees to foster a healthy and safe work environment and ensure that all levels of employees' support and cooperate with the Entity's health and safety initiatives. This committee meets quarterly or more frequently as required to discuss performance and new items.

Supplier Due Diligence

When selecting suppliers to engage with, the Entity considers community reputation, past performance, commodity pricing, and the likelihood of delivery. While the Entity approves, monitors, and oversees supplier performance, there is currently no formal policy guiding buyers on procurement processes or incorporating assessments related to this Act.

Risk Assessment

A risk assessment of Oxford Cattle's industry of operation, goods procured, and the countries goods are procured from has been performed over material direct suppliers. The risk assessment used two separate indices to conclude on the inherent risk of child and/or forced labour related to goods and countries – *Walk Free's Global Slavery Index* and the *US Department of Labor's List of Goods Procured by Child Labor or Forced Labor*.

Industry of Operation

Oxford Cattle operates within the agriculture industry. Given that the two indices noted above have identified risks of child labour and forced labour inherent to agricultural products, it is concluded that this industry has an inherent risk exposure.

Goods Procured

Oxford Cattle procures agriculture products. A risk assessment over the goods procured from material suppliers noted above has been conducted and identified an initial inherent risk of forced and/or child labour within the following categories: cattle, corn, and wheat.

All other remaining goods were not included in either of the indices therefore, conclude that they have a low inherent risk of child labour and/or forced labour.

Countries Which Goods Are Procured From

For the purposes of a risk assessment over countries goods are procured from, this report focuses on the direct suppliers only, specifically, the countries of head offices and direct business locations that Oxford Cattle purchases from.

Oxford Cattle procures goods from suppliers within Canada and the United States. Both indices have identified the countries as having a low inherent risk to the use of child and/or forced labour.

The results above indicate that there is a risk of forced or child labour within the agriculture industry. This does not mean that evidence of forced labour or child labour was found to support this risk analysis but that more auditing and monitoring will be needed to reduce the risk in these areas.

Remediation of Forced & Child Labour

To reduce the risk of child labour or forced labour within the Oxford Cattle's activities and supply chain, Oxford Cattle will continue to have conversations and engage with suppliers on the subject. Oxford Cattle has identified the opportunity to implement and enhance policies and due diligence mechanisms to reduce the risk of child labour and forced labour within their activities and supply chain.

Remediation of Vulnerable Family Income Loss

To date, there have been no instances identified by Oxford Cattle of forced labour or child labour within its activities or supply chains. Therefore, Oxford Cattle has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in their activities or supply chains.

Awareness Training

The Entity does not have training in place on the topic of child labour or forced labour. However, it conducts an onboarding process for new employees where the Entity reviews its policies and have new employees sign off to confirm their understanding and adherence to these policies. The policies have aspects related to forced labour and/or child labour through non-discrimination, anti-harassment, and professional behaviour clauses. This training is mandatory for all staff. The Entity also has a Joint Health and Safety Committee and Health & Safety Representative who aim to foster a healthy and safe work environment and ensure that all levels of employees' support and cooperate with the Entity's health and safety initiatives.

The Entity is exploring opportunities to provide training to all employees in identifying, assessing, and responding to risks of child labour and forced labour within their activities and supply chains.

Assessing Effectiveness

To track the Entity's effectiveness of procedures to mitigate the risk of child labour and forced labour, the following mechanisms are in place:

- Conduct and behaviour incidents: The Entity has zero tolerance for inappropriate conduct and behaviour. All claims made regarding this will be reported to management, including an action plan to resolve the issue in a timely manner.

- Supplier monitoring: Though informal, discussions will continue to exist with suppliers regarding issues that may impact the Entity's supply chain.

The Entity recognizes that there are areas of opportunities to reduce the risk of child or forced labour within its activities and supply chains.

Steps Taken by Entity

The Entity has taken the following steps to prevent and reduce the risk of forced labour or child labour:

- Mapping supply chains: Identifying components of Oxford Cattle's supply chain including who the suppliers are, country of origin, as well as the good supplied.
- 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, Oxford Cattle has identified risks within its activities and supply chains that have inherent risks of child labour and/or forced labour.
- Due diligence processes and policies: Oxford Cattle has policies, although nothing specific to voluntary recruitment of forced and child labour. Staff agree to and sign off on these policies when joining Oxford Cattle. As a general due diligence measure (internal control), Government-issued identification is verified at the time of hiring.

Oxford Cattle has processes for workers to report workplace incidents. The Entity maintains internal accountability standards and procedures to respond to failure by workers to meet organizational policies, expectations, and commitments; although, these are not specific to forced and child labour. There is an individual appointed by the Entity to oversee policies and compliance.

- Supplier due diligence: Oxford Cattle has due diligence measures when choosing and selecting suppliers to engage with, including community reputation, past performance, commodity pricing, and likelihood of delivery.

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 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.

Genevieve Ysselstein

Full Name

Signature



President

Title

May 29 2024

Date

I have the authority to bind *Oxford Cattle Company Ltd.*