



Modern Slavery Act Report

(Fiscal Year 2023)

Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") requires businesses to report on actions taken during the fiscal year to prevent and mitigate the risks of forced labour and child labour within their operations and supply chains. This report pertains to the fiscal year ending August 31, 2023, for Premier Marine Canada Inc. ("PMC"), a private corporation incorporated in the Province of Ontario. It outlines the measures taken by PMC in 2023 to address these critical issues.

PMC is an importer of frozen seafood from around the world and a creator of premium value-added meal solutions sold to the Canadian wholesale grocery industry through both private labels and our own brand. We fully support sustainable fishing, aquaculture, and farming practices.

We acknowledge our responsibility to respect and protect the human rights of all individuals connected to our business, including our colleagues, employees, and all workers employed by third-party suppliers in our supply chain. We are committed to preventing and reducing the risk of forced and child labour and expect our business partners and suppliers, as well as their contractors, agents, subcontractors, sub-agents, and labour agencies, to uphold these principles and comply with applicable human rights and employment standards laws.

Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

In 2023, PMC undertook several initiatives to mitigate the risk of forced and child labour within our operations and supply chains:

- **Supply Chain Mapping:** We mapped our supply chain to identify areas where the risk of forced and child labour could be high.
- **Risk Assessment:** Conducted internal assessments to evaluate the risks of forced and child labour in our activities and supply chains.
- **Action Plan Development:** Developed and implemented an action plan to address identified risks of forced and child labour.

- **Worker Recruitment Monitoring:** Collected information on worker recruitment processes and maintained internal controls to ensure all workers are recruited voluntarily.
- **Risk Mitigation Practices:** Addressed practices within PMC's activities and supply chains that could increase the risk of forced and child labour.
- **Due Diligence Policies:** Developed and implemented due diligence policies and processes to identify, address, and prohibit forced and child labour in our operations and supply chains.
- **Supplier Requirements:** Required suppliers to have policies and procedures to identify and prohibit forced and child labour within their operations and supply chains.
- **Supplier Engagement:** Engaged with supply chain partners to address issues related to forced and child labour.
- **Expert Consultation:** Consulted with experts on addressing forced and child labour.
- **Supplier Audits:** Conducted audits on suppliers to identify risks of forced and child labour within their factories.

Company Policies and Due Diligence Processes

PMC has established formal policies and due diligence processes to combat forced and child labour. These include:

- **Embedding Responsible Business Conduct:** Integrating responsible business practices into our policies and management systems.
- **Risk Identification and Assessment:** Identifying and assessing adverse impacts in operations, supply chains, and business relationships.
- **Impact Mitigation:** Ceasing, preventing, or mitigating adverse impacts.
- **Tracking Implementation:** Monitoring the implementation of policies and tracking results.

We define slavery or forced labour based on the International Labour Organization's definition: "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily." We also adhere to the definition of human trafficking from the Victims of Trafficking and Violence Protection Act of 2000.

Risk Assessment and Management

Recognizing the inherent risks within our global supply chain and industry, starting in 2023, all our offshore food manufacturers were required to undergo an ELEVATE Responsible Sourcing Assessment (ERSA). This evaluation ensures compliance with local laws concerning working conditions and environmental impacts, covering wages, working hours, health and safety, discrimination, disciplinary practices, freedom of association, and other critical areas.

Supply Chain Compliance: PMC's Quality Assurance (QA) department oversees supply chain compliance by ensuring workplace condition assessments align with our standards. Audits confirm that suppliers adhere to our Supplier Code, including provisions related to forced and child labour. We continuously review our supplier monitoring program to determine if its scope needs expansion.

Audit Program: Facilities in high-risk locations, such as Southeast Asia, require comprehensive assessments before sourcing begins. These assessments include audits of working conditions and fire, structural, and safety standards. The audit program ensures:

- Labour is voluntary.
- Workers are properly compensated.
- Workers are not exploited.
- Facilities comply with employment standards, including minimum age requirements.
- Working hours adhere to local laws and standards.
- Facilities meet health and safety regulations.

Third-party experts typically conduct initial and annual facility compliance audits, following a best-practice audit framework. PMC's QA team periodically conducts factory inspections to ensure standards are met and verifies any corrective actions. If non-compliance is identified, such as child or forced labour, PMC suspends relationships with the facilities and works on remediation. Relationships are terminated if compliance issues are not resolved.

To date, we have not identified any instances of forced or child labour within our activities and supply chains.

Remediation

To date, there have been no reported instances of income loss to vulnerable families resulting from measures taken to eliminate forced or child labour in our activities and supply chains.

Assessing Effectiveness

PMC continuously collaborates with suppliers to measure the effectiveness of their actions against forced and child labour by tracking relevant performance indicators. This ongoing assessment helps ensure that these practices are not present in our business and supply chains.

Approval and Attestation

In compliance with the Act, I attest that I have reviewed the information contained in this report. Based on my knowledge and exercising reasonable diligence, I attest that the information is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year listed above.



Steven Corbeil
President, Premier Marine Canada Inc.
Date: May 23, 2024