

Statement on Forced and Child Labour in Supply Chains

Richardson International Limited, along with each of its subsidiaries listed below (“Richardson”), is committed to the abolition of forced labour and child labour. In this statement, we set out the steps we have taken to ensure that such practices are not taking place in our supply chains nor in any part of our business. Richardson makes this statement in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) for the 2023 reporting year. Though Richardson fulfills the purposes of legal enactments in other jurisdictions, such as the UK Modern Slavery Act 2015, our operations in Canada are not subject to such foreign reporting requirements. This statement is on behalf of the following entities which have assets, revenue, and business in Canada:

Richardson International Limited
Richardson Milling Limited
Richardson Oilseed Limited
Richardson Oilseed Products Limited
Richardson International (Saskatchewan) Limited
Richardson Oilseed Holdings Limited
Richardson Pioneer Limited

Richardson’s Structure, Activities, and Supply Chains

Richardson is a worldwide handler and merchandiser of all major Canadian-grown grains and oilseeds, including agronomy services and sales, and food processing. With a legacy of service going back 160 years, our vertical integration strategy starts with the relationships we have with our farmer customers and ends with the sale of oat-, wheat-, and canola-based food products and ingredients for kitchens around the world. Our goal today remains the same as originally articulated by our founder, “To be the kind of business organization in which people can place their trust.” We serve this goal through our six core values: trust, excellence, teamwork, strategic thinking, innovation, and ethics. We value our leadership role in our industry and in our communities, and are always working to enhance our facilities and services, improve our processes, and strengthen our relationships. We are committed to our business, our products, our people, our environment, and our community.

Richardson operates through a variety of business units and wholly-owned subsidiaries. Richardson International Limited is their parent organization. Though our businesses may focus on certain aspects of the food supply chain, they are all fully integrated into the Richardson business enterprise. From seed and crop inputs, including fertilizers and crop protection treatments, to farm services and the collection, handling, merchandising, milling of grain, and crushing of oilseed, Richardson relies on trusted business partners in both domestic and foreign business affairs. Our suppliers and business partners operate in Canada but also globally in sourcing raw inputs, and delivering products for sale.

Policies and Due Diligence Processes Related to Forced and Child Labour

Richardson stands firm against any form of forced or child labour. In all our business dealings, we act in accordance with our strong values and standards of conduct that comply with, and exceed, applicable laws and which reflect internationally recognized human rights principles. We will neither condone nor tolerate forced or child labour by any of our employees, suppliers, vendors, or other business partners. To that end, Richardson has adopted best practices for responsible business conduct and is aligned to the [United Nations Guiding Principles on Business and Human Rights](#).

We are proud of the proactive steps we have taken to ensure our conduct and that of our business partners is consistent with international standards for human rights. Richardson actively evaluates and monitors compliance through formal risk assessments under our supplier risk management program. This includes Richardson's Social Responsibility Disclosure requirements for our suppliers which reflect the expectation that our suppliers fight forced labour. Suppliers are also subject to audits to verify compliance with corporate and regulatory criteria, including review of relevant policies and practices in their operations. We affirmatively obtain confirmation from our vendors as to their compliance with applicable laws and regulations, and go one step further by seeking information from our direct vendors as to the practices of second-tier suppliers. If we become aware of credible information about any form of forced or child labour by our suppliers or vendors, we will conduct a thorough investigation and take corrective measures including termination of business relationships.

Identification of Business Areas and Supply Chains That Carry a Risk of Forced or Child Labour; Steps Taken to Prevent and Reduce That Risk

Though specific occurrences of forced or child labour have not been identified, operating in agriculture, manufacturing, and international trade can present these risks both at home and abroad. These risks arise predominantly in the form of labour at agricultural sites and labour in the processing and transportation of goods.

Richardson remains vigilant in monitoring risks for forced and child labour in our supply chains. We have global processes in place to monitor compliance with international labour and social standards including forced and child labor. This starts with our Corporate Health and Safety Program which plays an on-going role in risk identification and mitigation. Under this program a select committee meets regularly to ensure goals and objectives are met and to engage with employees where risk areas are identified.

Second, Richardson evaluates supply chains and specific supply chain partners on both economic and non-economic criteria, including consideration of a would-be partner's compliance with internal and international standards concerning human rights. This evaluation includes regular monitoring of developments in international affairs, including sanctions; communication to relevant personnel regarding relevant changes; and cross-functional dialogue at high levels of the organization on any transaction, or potential transaction, of concern.

Third, Richardson expressly encourages all employees to actively and promptly report any concern regarding conduct at odds with our position on forced and child labour. Employees are encouraged to consult not only their managers but also the human resource and/or legal department.

Fourth, our workforce, recruitment, hiring, and employee development programs further reflect our commitment to a diverse and inclusive workforce free of forced labour. Richardson's recruitment policy, practices, and reporting ensures that all recruitment is consistent and fair in accordance with our values. This includes verifying each candidate's ability to legally work in our locations.

Finally, Richardson's operations have successfully undergone the internationally recognized Sedex Members Ethical Trade Audit ("SMETA"). This audit tested our practices regarding forced labour, child labour, discrimination, harassment, and abuse. It validated the effectiveness of our programs and our training and communication to managers and other employees. It also affirmed our approach to building practices based on tailored risk assessments and a review of the effectiveness of internal policies.

Measures Taken to Remediate Forced or Child Labour, Including Remediation of Loss of Income to Impacted Families

Neither Richardson's internal nor independent third-party review identified any areas for remediation concerning forced or child labour in either the operations or supply chains of the company. We will remain vigilant in our monitoring practices and address any occurrence or concern promptly.

Training Provided to Employees on Forced and Child Labour

Richardson provides relevant training as a component of employee on-boarding. We reinforce this training through business practices and further tailored training to those employees whose work involves encountering risks for forced and child labour. Additional training includes instruction on managing audits and inquiries to our suppliers and vendors, assessing information about suppliers, use of internal resources for risk reduction, reporting concerns, and other relevant topics. Resources are also provided for key employees to stay informed about developments in the areas of forced and child labour law, enforcement, and prevention.

Assessing Our Effectiveness in Ensuring That Forced and Child Labour Are Not Used

Richardson actively implements internal compliance monitoring practices and programs that reinforce our code of ethics and encourage all employees to report any concerns. Specifically, these programs include annual review of our supplier statements and affirmations concerning forced and child labour, as well as the on-going monitoring of developments with our suppliers, such as their relevant certification status with international bodies, and tracking supplier performance in accordance with relevant policies.


In addition, Richardson's operations underwent significant independent third-party testing pursuant to the internationally recognized SMETA audit. This audit tested our effectiveness in living out our corporate social responsibility standards. We are proud of the results of that audit which affirmed the effectiveness of Richardson's policies, programs, and training.

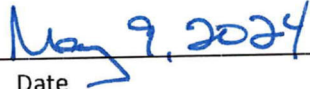
In closing, Richardson's Board of Directors, Executive Leadership, management, staff, and business partners will continue to work together to further the commitment to fight forced and child labour. This partnership will help ensure that human rights are being respected throughout our workforce and supply chains.

This statement has been approved by the board of directors for Richardson International Limited, as well as each of the listed subsidiaries, as of March 2024.

Attestation

In accordance with the requirements of the Act, and in particular section 11(4)(b)(ii) thereof, I attest that I have reviewed the information contained in this report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the above report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind Richardson International Limited and its listed subsidiaries.


Signature


Date

Jean-Marc Ruest

SVP, General Counsel, and Assistant Secretary for Richardson International Limited;
Secretary for listed subsidiaries