

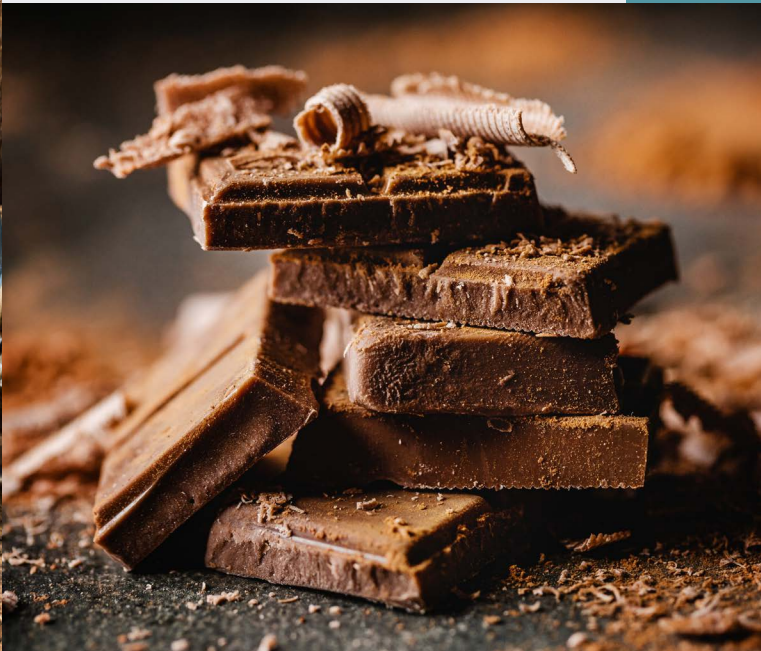


ROGERS *Lantic* 

**FIGHTING AGAINST
FORCED LABOUR &
CHILD LABOUR IN
SUPPLY CHAIN**

2023 REPORT – MAY 2024

TSX: RSI





Rogers Sugar Inc. owns all of the common shares of Lantic Inc., which operates cane sugar refineries in Montréal, Québec and Vancouver, British Columbia, as well as the only Canadian sugar beet processing facility in Taber, Alberta. Rogers Sugar Inc. operates as a manufacturing entity, adhering to regulatory categorization requirements.

Lantic



Lantic Inc. also owns all of the common shares of The Maple Treat Corporation ("TMTC"). TMTC operates plants in Granby, Dégelis and in St-Honoré-de-Shenley, Québec and in Websterville, Vermont.

Legal Structure



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DALLAS H. ROSS
Chairman



BOARD ATTESTATION

THE BOARD OF DIRECTORS OF ROGERS SUGAR INC. APPROVED THIS REPORT ON BEHALF OF ALL ENTITIES THE COMPANY OWNS OR CONTROLS THAT ARE REPORTING ENTITIES PURSUANT TO THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAIN ACT (THE "ACT") ON MAY 9TH, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the listed entity or entities. Based on my knowledge, and having exercised reasonable diligence, I attest that the information contained in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year 2023.

A handwritten signature in black ink that reads "Dallas H. Ross". The signature is written in a cursive, flowing style.

Dallas H. Ross

Chairman of the Board

May 9th, 2024

I have the authority to bind Rogers Sugar Inc.



ABOUT THIS REPORT

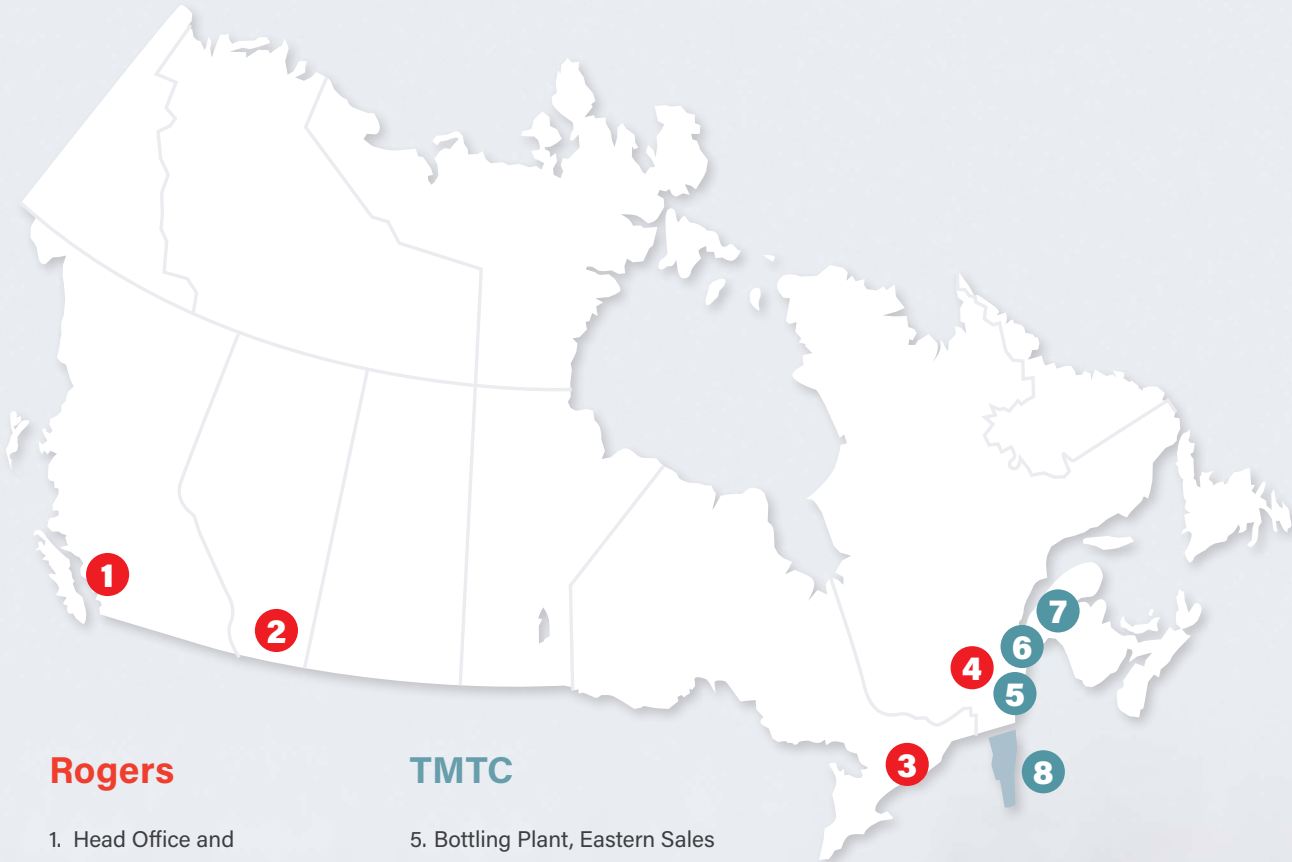
AT ROGERS SUGAR INC., WE ARE GUIDED BY A SET OF VALUES THAT DEFINE WHO WE ARE AND THE WAY WE WORK. WE RESPECT AND STRIVE TO PROTECT HUMAN RIGHTS AND, TO THIS END, ARE WORKING TO IDENTIFY, MANAGE AND ELIMINATE THE RISK OF FORCED AND CHILD LABOUR ASSOCIATED WITH OUR BUSINESS ACTIVITIES AND SUPPLY CHAINS.

This joint forced and child labour report covers Rogers Sugar Inc. operations in Canada and the United States of America for the period of October 1st, 2022 to September 30th, 2023 (the organization's fiscal year), and is inclusive of all subsidiary organizations including, Lantic Inc. and the Maple Treat Corporation. Rogers Sugar Inc. is listed on a stock exchange in Canada as RSI. All information included in this report is applicable to Rogers Sugar Inc. and all of its subsidiaries and outlines our actions to assess and address forced and child labour risks within our operations and the supply chains of our Sugar and Maple product business segments.

This report has been prepared by Rogers Sugar Inc. in its own capacity and on behalf of the entities it owns or controls that are considered reporting entities under the Act, referred to together as Rogers, we, us and our in this report.

This is our first Forced and Child Labour Report, outlining the initiatives already commenced, those implemented in 2023 and areas of focus for future years.

OUR FACILITIES



Rogers

1. Head Office and Cane Refinery
Vancouver, BC
2. Sugar Beet Plant
Taber, AB
3. Distribution Centre
Toronto, ON
4. Administrative Office and Cane Refinery
Montréal, QC

TMTC

5. Bottling Plant, Eastern Sales and Distribution
Granby, QC
6. Bottling Plant, Warehousing and Shipping
Saint-Honoré-de-Shenley, QC
7. Bottling Plant, Warehousing and Shipping
Dégelis, QC
8. Bottling Plant, Warehousing and Shipping
Websterville, VT

983

EMPLOYEES

8

FACILITIES



STEPS TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

At Rogers we understand that a reliable and resilient supply chain is essential to our success. We recognize that the supply of raw and refined sugar, sugar beets and maple syrup are heavily dependant on both a functioning natural environment and a strong community in the local areas where the raw materials are sourced.

Our commitment drives our plan to increase the share of sustainably sourced raw sugar by sourcing from producers who follow certified or verified sustainable agricultural practices.

Internally, the Company has:

- Developed a Human Rights Policy that specifically notes that the Company will not tolerate the use of child or forced labour in any of its operations and facilities; this policy has been in place since 2019.
- Successfully completed a Sedex SMETA audit at our Montreal cane sugar refinery, following the successful completion of audits in 2022 of our Vancouver cane sugar refinery and Taber beet processing plant.

In Our Supply Chain:

- Mapped our agricultural materials supply chain.
- Developed our Ethical and Sustainable Sourcing Policy Statement and Ethical and Sustainable Sourcing Supplier Code of Conduct, first completed in 2022 and updated in 2023, to convey Rogers' expectations to our suppliers.
- Distributed the updated Ethical and Sustainable Sourcing Policy Statement and Ethical and Sustainable Sourcing Supplier Code of Conduct to all suppliers, requesting signing and return. In 2023, through leveraging our already strong relationships, we successfully achieved a high execution rate for all direct suppliers across raw material and packaging, based on spend.
- Developed our Sustainable Purchasing Guidelines for the Company's purchasing agents, which incorporates several social considerations, including sourcing products from suppliers who directly and indirectly prohibit forced and child labour.
- During 2023, we have taken the necessary logistical steps to ensure the successful delivery of raw sugar from an executed multi-year supply partnership with a major Brazilian supply partner. This sugar is certified Bonsucro sugar for our Eastern Canada operations and will be received at our Montreal refinery, with the first delivery from this agreement received in early 2024.

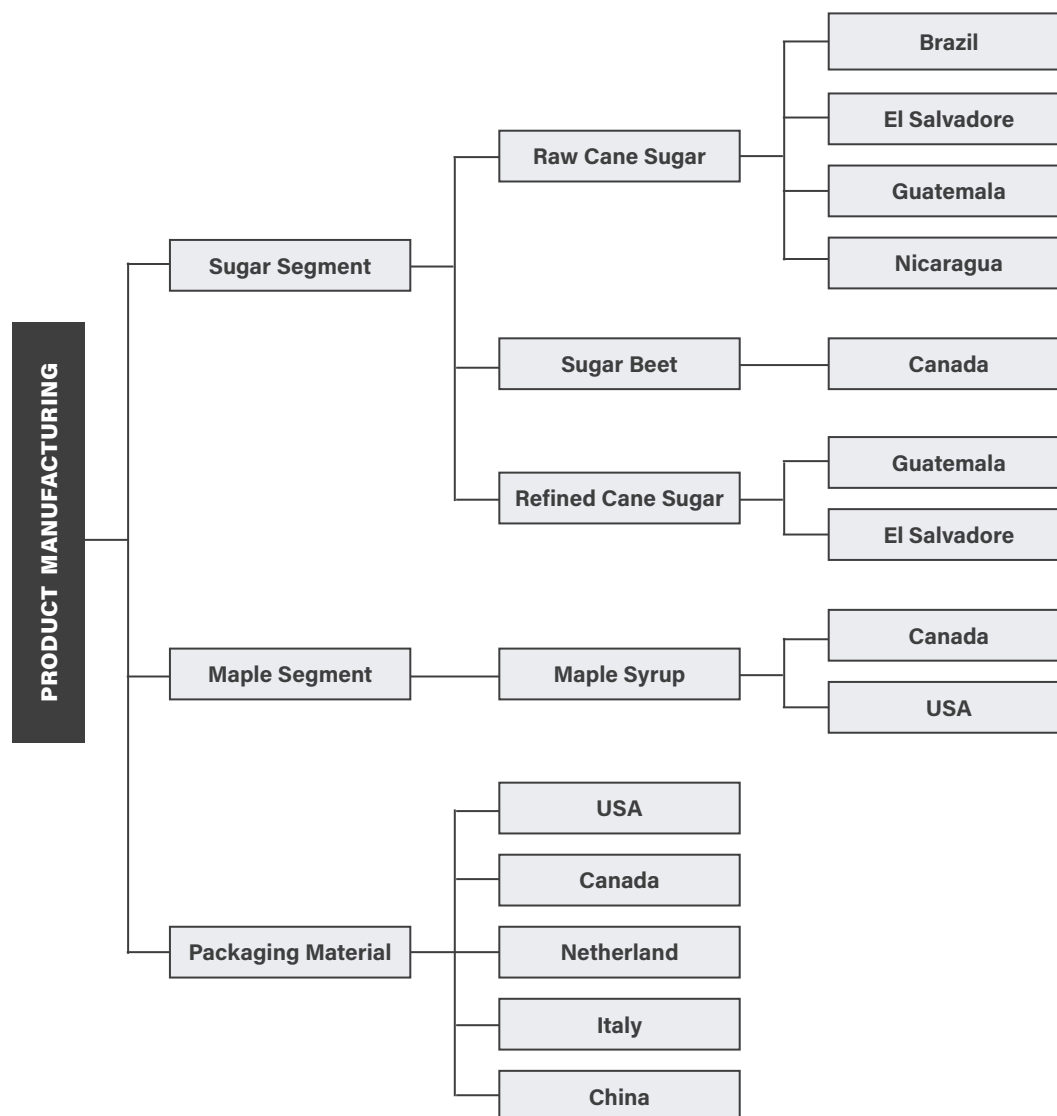
STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Rogers Sugar Inc. is a corporation that owns sugar and maple syrup businesses in North America that produce, sell and distribute goods both in Canada and internationally.

These businesses are:

- Lantic Inc. – Canada
- The Maple Treat Corporation – Canada
- Highland Sugarworks Inc. – United States of America

Our supply chains operate across several different sectors, including maintenance and engineering, freight, packaging, and agriculture - where we have separate supply chains for raw sugar, refined sugar, sugar beets, and maple syrup. Agriculture is recognized as a high-priority sector globally in terms of the potential risk of forced and child labour. As such, it is critical that we understand the potential risks at every stage of our sugar supply chain; from the agriculture stage to the purchasing of sugar beets and raw and refined cane sugar from growers, mills and third-party intermediaries, in both our countries of operation and countries that supply our manufacturing processes.



POLICIES AND DUE DILIGENCE PROCESSES

Rogers Sugar Inc. policies regarding forced and child labour are managed through Lantic Inc. operational policies. These include:

- Human Rights Policy – Shared internally with our employees.
- [Sustainability Policy Statement](#) – Shared externally on our website.
- [Ethical and Sustainable Sourcing Policy](#) – Shared externally on our website.
- Ethical and Sustainable Sourcing Code of Conduct – Shared externally with our suppliers.

The Company's Ethical and Sustainable Sourcing Code of Conduct covers the following principles:

- Anti-bribery and Corruption
- Conflicts of Interest
- Gifts
- Confidentiality
- Human Rights as set forth in The United Nations Universal Declaration of Human Rights
- Health and Safety Regulations
- Freedom of Association
- Working Hours, Salaries and Wages
- Child Labour and Young Workers
- Non-discrimination, Abuse and Harassment
- No Forced, Bonded, Slave and Human Trafficking
- Environmental Sustainability
- Land Rights of Communities

FORCED LABOUR AND CHILD LABOUR RISKS

Identifying forced and child labour risk in our business and our supply chain is crucial. During our initial screening exercise, we have highlighted two primary areas of potential risk:

1. Agricultural products – Our agricultural products, including raw sugar, refined sugar, sugar beets, and maple syrup within our supply chains, come with inherent sector-specific risks. Additionally, we acknowledge an extra risk linked to sourcing raw and refined sugar internationally.
2. Glass bottles – Our maple syrup business procures large quantities of glass bottles sourced from overseas.

As we progress and target a better understanding of our potential risk exposure, we are identifying tools to help measure and monitor risk across multiple sustainability risks, including forced and child labour.

REMEDIATION MEASURES

Rogers' Ethical and Sustainable Sourcing Code of Conduct outlines our expectations of our suppliers. Where incidences of forced or child labour are identified in our supply chain, we will work with the relevant supplier(s) on a case-by-case basis to implement effective time-bound remediation measures to address them. If compliance with the Code is suspected or proven to have been breached by any supplier, we will request open and effective cooperation with evaluations and subsequent corrective remedial actions.

Certification / Verification

To reduce the potential risks associated with forced and child labour in the areas identified as relatively higher risk - our raw sugar and refined sugar supply chains- we have set an organizational guideline to increase the volume of our raw sugar supply from producers who follow verified or certified sustainable agricultural practices.

To reduce forced and child labour risk in our cane sugar supply chains, we procure a volume of Bonsucro certified sugar. Bonsucro is the leading global sustainability platform and standard for sugarcane, with the purpose of collectively accelerating the sustainable production and use of sugarcane, focusing on climate action, human rights and value in the supply chain. Lantic Inc. has been a member of Bonsucro since 2014 and maintains Bonsucro Chain-of-Custody certification. We are continually working to identify additional verification and certification standards that meet our strict eligibility requirements, with a goal of increasing the volume of verified or certified sustainable sugar in Canada.

Additionally in 2023, 100% of sugar beets processed at our Taber beet processing plant are procured through The Alberta Sugar Beet Growers (ASBG), who represent all Albertan sugar beet growers. The ASBG beets are verified as sustainably grown, produced at the Farm Sustainability Assessment (FSA) Silver level. This level has been set as the growers' standard for on-farm best management practices. Furthermore, this verification extends past the sugar beets, applying to the growers entire on-farm practices.

Traceability

We are pleased to report that we can trace 100% of our sugar beets and maple syrup supply to the farms where they are sourced in Canada and the United States of America. We are also pleased to state that we trace 100% of our refined sugar and raw cane sugar supplies, which are primarily sourced from South and Central America, back to the mills where the sugar cane has been processed.

REMEDIATION OF LOSS OF INCOME

We are consistently striving to increase our raw sugar supply from producers who follow certified or verified sustainable agricultural practices. This effort involves considering the cost premiums linked with verifications like the Farm Sustainability Assessment and certifications such as Bonsucro. The governance structures of such programs are scrutinized by Rogers to ensure that price premiums paid by the Company have a meaningful positive impact on direct and indirect supply chain stakeholders. In 2022, Bonsucro reported that certified farms paid wages approximately 19% above the respective national minimum wage in countries where they are present.

TRAINING

The complex nature of our supply chains will always present unforeseeable challenges. Therefore, we need to ensure we embed our principles and generate awareness of the risks of forced and child labour with our buying agents, helping them identify the indicators and act quickly for faster and more effective remedial action for supply chain stakeholders. In 2023, we developed and distributed our Sustainable Purchasing Guidelines to our multiple internal purchasing groups. This guidance document provides information to internal purchasing agents on key sustainability considerations to incorporate into their decisions making, including social considerations such as forced and child labour.

ASSESSING EFFECTIVENESS

The Company has developed measures to monitor and reduce any potential forced or child labour risk:

- Distributed the updated Ethical and Sustainable Sourcing Policy Statement and Ethical and Sustainable Sourcing Supplier Code of Conduct to all suppliers, requesting signing and return. In 2023, through leveraging our already strong relationships, we successfully achieved a high execution rate for all direct suppliers across raw material and packaging, based on spend.
- Rogers Sugar Inc. is actively collaborating with suppliers to ensure a continuous increase in the sourcing of raw sugar from certified or verified sustainable sources.

Moving forward, the Company plans to incorporate tools to help identify areas within the supply chain that may be more susceptible to forced or child labour risk, providing the information to incorporate more meaningful supplier engagement and initiating targeted mitigation measures.

ROGERS

Lantic



lanticrogers.com
themapletreat.com

