



## **Skjodt-Barrett Foods Inc.**

Report Pursuant to the Fighting Against  
Forced Labour and Child Labour  
in Supply Chains Act ("Modern Slavery Act")

Fiscal Year 2023

## 1. Introduction

At Skjodt-Barrett Foods we are committed to responsible business practices which includes environmental sustainability and fostering a diverse, equitable, and inclusive workforce. Our vision includes a focus on protecting and advancing social responsibility, compliance, and human rights within our operations and supply chain. Forced labor and child labor are fundamentally opposed to our values. We do not tolerate such practices within our organization or among our suppliers and subcontractors. We adhere to high standards and expect our directors, officers, team members, suppliers, and subsidiaries to act with integrity and comply with all applicable laws, regulations, and rules. Should these expectations not be met, we will respond appropriately.

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) mandates that businesses disclose actions taken during the fiscal year to prevent and mitigate the risk of forced labor or child labor within their operations and supply chain. This report pertains to Skjodt-Barrett Foods Inc. and its subsidiaries, collectively referred to as “Skjodt-Barrett Foods” or “SBF” and covers the fiscal year ending in 2023.

## 2. Steps taken to prevent and reduce risks of forced labour and child labour

Protecting and advancing human rights is fundamental to our values, including freedom of association and freely chosen employment. We do not tolerate modern slavery, forced labor, or child labor in our operations or supply chain. As an industry leader, we are committed to preventing and addressing these risks and expect our business partners and suppliers to uphold these principles and comply with human rights and employment standards laws.

In 2023, SBF has taken the following steps to prevent and reduce the risk that forced labour or child labour is used within our own operations and within our supply chain.

- Development and implementation of the SBF Supplier Code of Conduct with updates communicated to team members.
- Developed future plans for the implementation of a more structured and robust program that includes but is not limited too
  - Annual review of the terms of the Supplier Code of Conduct
  - Implementation of policies and processes designed to prevent forced labour and child labour, including validating age of employment eligibility, labour hours overtime tracking and respect in the workplace, as well as our robust occupational health and safety policies and procedures
  - Development and training of an overarching Business Code of Conduct for all salaried team members

## 3. Structure, activities and supply chain

### **Structure**

Skjodt-Barrett is a corporation with headquartered in Brampton, Ontario with manufacturing plants in Canada and USA. The company is majority-owned by Axel

Johnson Inc, based in New York. Skjodt-Barrett employs close to 1,000 people as of 2023 across both locations. The company is a paying member of Eco Vadis and Sedex ESG platforms and has conducted responsible business self-audits on these platforms in previous years. SBF has placed in the top 56 percentile of our manufacturing peers in the Eco Vadis CSR management system self audit.

### ***Activities and Supply Chain***

From an operational perspective SBF is a business to business (B2B) primary and secondary food processor. We produce food products that will end up in retail, food service and other industrial channels. We rely on many suppliers for our ingredients, indirect goods and services. Our supply chain involves purchasing a broad range of goods and services, largely from Canadian, United States and South American sources.

We are committed to meeting high standards of respect and integrity in our business relationships and activities. These standards apply both within our organization and to our suppliers and contractors. We follow a fair sourcing process and manage our supply chain effectively. We are working to implement programs to better identify, assess and monitor areas where there may be a risk of forced labor or child labor.

#### **4. Policies and due diligence processes in relation to forced labour and child labour**

We believe that good governance is essential for a respectful and inclusive corporate culture that earns trust and builds value for all stakeholders. Respecting human rights is a shared responsibility of all enterprises globally.

### ***Code of Business Conduct and Culture***

Our corporate values guide us and set expectations for our behavior and decision-making. Our values lay the foundation for how we work together in a respectful, transparent and fair environment. Skjodt-Barrett Foods is committed to the high standards of ethical, moral and legal business conduct. Our various policies provide a roadmap for our expectations around ethical conduct and reporting concerns, including compliance with all applicable laws and regulations. Skjodt-Barrett Foods will not condone the activities of any of our team members who violate the law or engages in unethical business practices, including forced labour and child labour.

We require and expect actual or possible violations of our Code of Business Conduct provisions with respect to human rights to be reported, and we take appropriate action to review and address any issues. SBF is looking to continue the advancement of our onboarding and training programs to reinforce a culture of caring for our people and planet.

## ***Supplier Code of Conduct***

Our Supplier Code of Conduct is shared to our suppliers and are obligated to uphold human rights of workers and to treat them with dignity and respect in accordance with recognized international labour standards. This applies to all workers, including temporary, migrant, student, contract, direct employees and any other type of workers. We expect our suppliers to make the following commitments in their labour practices by having controls in place that:

**Human Rights:** Suppliers must ensure that no work is performed under threat or without consent, including forced, indentured, prison, bonded, or slave labor. They must monitor third-party entities involved in recruitment to ensure no employee is compelled to work through force, deception, intimidation, coercion, or punishment for political views.

**Child Labor:** Suppliers are prohibited from using child labor, defined as individuals under 15 years old or below the age of compulsory education completion. No child should perform work that compromises their health, safety, or morals or interferes with their education.

**Health & Safety:** Suppliers must provide a safe and hygienic workplace that does not endanger employees' physical integrity or health. Employers must adopt proactive health and safety measures, including policies, systems, and training to prevent and reduce accidents, injuries, and health risks.

**Working Conditions:** At a minimum, suppliers must provide safe drinking water, clean and adequate toilets, proper ventilation, emergency exits, adequate lighting, and access to medical care. Any sanitary equipment, canteens, and housing must meet legal requirements. Employers should continuously work towards improving working conditions.

**Community Engagement:** Suppliers are encouraged to be good citizens and leaders in enhancing the wellbeing and sustainability of their local communities.

Our Supplier Code of Conduct requires that all business providing goods or services to Skjodt-Barrett Foods must in turn apply those standards to its own supply chain and subcontractors, including providers of contract labour and services.

### ***Additional Policies and Frameworks***

Skjodt-Barrett Foods is working to build additional policies and procedures to ensure we meet the highest standards. Our policies will meet or exceed applicable local and national laws where we operate, they are grounded in our Values and ethical standards, and informed by recommended international principles, such as the United Nations' Guiding Principles on Business and Human Rights and International Labour Organization Conventions.

## 5. Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

Skjodt-Barrett Foods recognizes that some elements of our supply chain present a risk of forced labour or child labour. The ways we identify and manage this risk include:

- Applying our Supplier Code of Conduct
- Future Efforts will include
  - Enforcing our purchasing, human resources and occupational health and safety policies
  - Engaging with our team members, suppliers, customers and other stakeholders as a way of identifying risk or non-compliance
  - Completing reviews of supplier operations and practices as part of our supplier assessment program prior to supplier selection
  - Updating our sustainability materiality assessment, which included a social compliance risk component

In 2022 and 2023, we conducted responsible business self-audits with EcoVadis and Sedex. Following a gap assessment, we aim to develop a new social compliance program in 2024 with focused details around forced and child labour. This effort will enhance our policies and processes, ensuring we avoid contributing to adverse human rights impacts through our activities and mitigate any potential impacts within our supply chain.

If we identify a compliance issue, including but not limited to, child labour, forced labour or life-threatening health and safety situations, we may, as appropriate, suspend our relationship with those suppliers, work with them to determine whether satisfactory remediation of the compliance issue is possible and/or terminate relationships with suppliers who are unable or unwilling to remediate non-compliance.

## 6. Any measures taken to remediate any forced labour or child labour

To date, there have been no identified or reported instances of forced labour or child labour in our activities and supply chain.

## 7. Remediation of 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

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

## 8. Training provided to employees on forced labour and child labour

SBF is developing updated onboarding programs for our salaried team members to include training on a new Code of Business Conduct and a number of supporting human resource and safety policies. We will require these team members to review and sign off on our Code of Business Conduct annually and have a range of training programs.

## 9. Effectiveness assessments to ensure that forced labour and child labour are not being used in its business and supply chains

SBF does not currently have any programs in place to assess the effectiveness of our actions to date so we are building new programs for Governance, Engagement, Risk Management and Monitoring for implementation in 2024 and 2025.

## 10. Conclusion

“We Care” is a core Leadership Value at Skjodt-Barrett Foods. We operate our business by acting with integrity, behaving responsibly and treating people with respect. We are committed to providing a work environment that supports the health, safety and mental well-being of our people, characterized by mutual respect, fairness and empathy.

SBF is still early in our journey to formalize our commitments and will be working to integrate these principles into our policies, procedures and practices. This commitment to human rights will be embedded within our Business Code of Conduct, our Supplier Code of Conduct and our Diversity, Equity and Inclusion (DEI) values. These policies and standards, along with compliance with applicable laws and regulations, protect all our people and those we serve, including our consumers, customers and communities.

Skjodt-Barrett Foods remains committed to preventing forced labour and child labour from taking place in our businesses and in our supply chains, and we will continue to build our policies, procedures and practices into the future.

## 11. Approval and Attestation

This report will be approved by our Board of Directors on June 3, 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 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.

A handwritten signature in black ink, appearing to read 'Jamie Chiarotto', is written over a solid horizontal line.

Jamie Chiarotto  
President and CEO, Skjodt-Barrett  
Foods Inc. May 28<sup>th</sup>, 2024  
I have authority to bind the Corporation.