



The Crump Group, Inc.- Bill S-211

Annual Report - June 1, 2023 - May 31, 2024

Executive Summary:

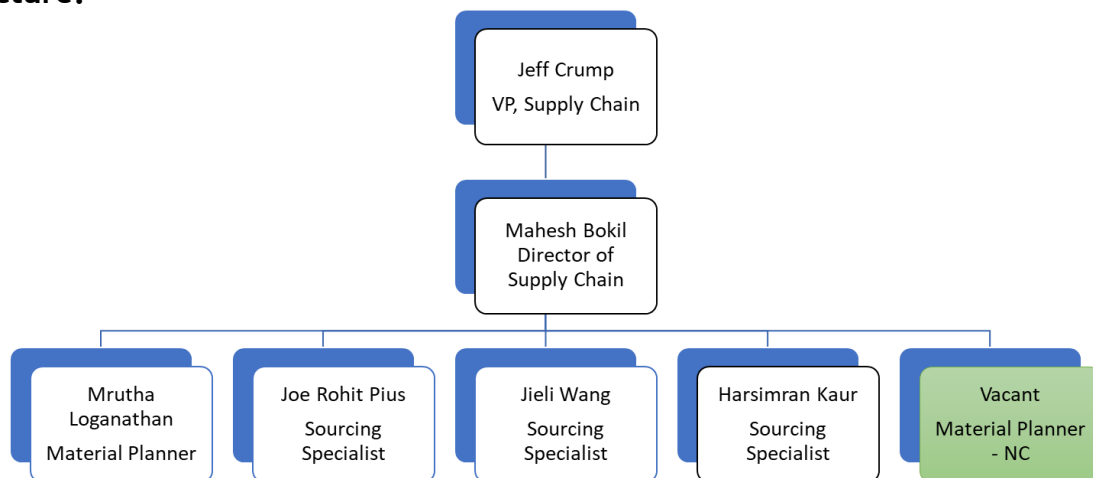
This report provides an overview of our company's efforts to prevent and address child labour in our supply chains, in compliance with Bill S-211. We disclose our policies, due diligence processes, and actions taken to identify and mitigate the risk of child labour. Our commitment to ethical sourcing practices aligns with the objectives of Bill S-211 and underscores our dedication to upholding human rights and corporate social responsibility.

About Us:

The Crump Group Inc., is a pet treat company, part of the Food and Beverage Industry, employing approximately 160 employees in Canada and approximately 53 employees in the US under The Crump Group USA Inc. In Canada, our facility is located at 2050 Drew Road, Mississauga, Ontario L5S 1S4. We are filing this report as we produce, sell and/or distribute goods in Canada or elsewhere.

As a responsible corporate citizen, we recognize the importance of ensuring that our operations and supply chains are free from child labour, forced labour and other forms of exploitation. Bill S-211 underscores the need for transparency and accountability in addressing this critical issue, and we are committed to fully complying with its requirements. Our BIN is 848 577 961RP0001 and our financial year is July 1st to June 30th.

Structure:





Activities:

The Crump Group Inc., operating in both Canada and the USA, engages in various activities related to the production, purchase, and distribution of pet treats. These activities encompass production, manufacturing, purchasing, and distribution, with a focus on ensuring high-quality products reach consumers.

Production and Manufacturing:

The Crump Group Inc. operates multiple manufacturing facilities across Canada and the USA. These facilities are equipped with state-of-the-art machinery and adhere to stringent quality control measures. The production process involves sourcing premium ingredients, such as organic meats and grains, to create a diverse range of pet treats. These treats include cookies, jerky, chews, and dental sticks. The Crump Group Inc. ensures that production volumes are optimized to meet market demand while maintaining product quality.

Sourcing and Purchasing:

In collaboration with trusted suppliers, The Crump Group Inc. procures raw materials from various sources. These materials include meat, poultry, fish, vegetables, and grains. The procurement process prioritizes suppliers with a proven track record of quality and sustainability. The Crump Group Inc. regularly assesses supplier performance to ensure adherence to ethical and environmental standards. Additionally, the purchasing team actively explores new suppliers and ingredients to diversify product offerings and cater to evolving consumer preferences.

Distribution:

The Crump Group Inc. operates an extensive distribution network spanning Canada and the USA. Distribution centers strategically located in key regions facilitate efficient product delivery to retailers, wholesalers, and e-commerce platforms. The distribution process is streamlined to minimize lead times and optimize inventory management. The Crump Group Inc. utilizes advanced logistics technologies to track shipments and ensure timely delivery. Additionally, the distribution network is flexible, allowing for rapid scalability to accommodate fluctuations in demand.

Kinds and Volumes of Goods:

The Crump Group Inc. produces a wide range of pet treats tailored to meet the nutritional needs and preferences of various pets. These treats are available in different flavors, sizes, and formulations to cater to diverse tastes and dietary requirements. Production volumes vary based on market demand, seasonal trends, and promotional activities. However, The Crump Group Inc. consistently strives to maintain sufficient inventory levels to meet customer demands while minimizing excess stock.



In summary, The Crump Group Inc. engages in comprehensive pursuits related to the production, purchase, and distribution of goods across Canada and the USA. Through a combination of advanced manufacturing processes, strategic sourcing, and efficient distribution, The Crump Group Inc. delivers high-quality pet treats to consumers nationwide. By prioritizing quality, innovation, and sustainability, The Crump Group Inc. remains committed to meeting the evolving needs of pet owners and their beloved companions.

Policies:

Our company has implemented robust policies that prohibit the use of child labour and forced labour in any stage of our supply chains. These policies are outlined in our Code of Conduct, which sets forth our commitment to upholding human rights, labour standards, and ethical business practices. Key elements of our child labour and forced labour policy include:

- Zero-tolerance for child labour and forced labour: We explicitly prohibit the employment of children under the legal working age in any of our operations or supply chains. Please see our Child Labour and Forced Labour Policy as well as our Human Rights Policy in Appendix A
- Supplier requirements: We require all suppliers to adhere to our child labour and forced labour policy and conduct due diligence to ensure compliance throughout the supply chain

Monitoring and reporting:

We have established mechanisms for monitoring and reporting any instances of suspected or confirmed child labour, and we take immediate action to address violations. Our employees are encouraged to refer to our Open-Door process or our third-party Whistleblower/Ethics Line where employees, vendors and customers, are encouraged to call should a 'matter warranting disclosure', be identified. These policies are also included in Appendix A. Training has been provided to employees regarding these policies during the current fiscal, and posters and reminders are posted around the facility regarding the Whistleblower Policy and the ethics hotline contact information.

Due Diligence Processes:

Our due diligence processes are designed to identify and mitigate the risk of child labour and forced labour in our supply chains. These processes include:

- Supply chain mapping: We conduct comprehensive assessments of our supply chains to identify high-risk areas and prioritize efforts for monitoring and intervention
- Supplier assessments: We assess potential and existing suppliers to evaluate their adherence to our child labour and forced labour policy and identify any areas of concern
- Audits and inspections: We conduct regular audits and inspections of supplier facilities to verify compliance with our policies and identify any instances of non-compliance
- Age verification: during the onboarding process, we verify that all new employees meet the age requirement of 18 years of age or older



Actions Taken:

In addition to proactive measures to prevent child labour and forced labour, we take swift action to address any instances of non-compliance. Actions taken include:

- Remediation efforts: When instances of child labour or forced labour are identified, we work closely with suppliers to implement corrective actions and remediation measures
- Supplier engagement: We engage with suppliers to raise awareness of the importance of ethical sourcing practices and provide support and guidance to improve compliance
- Collaboration and partnerships: We collaborate with industry partners, government agencies, and civil society organizations to share best practices, leverage resources, and drive collective action to combat child labour and forced labour

Conclusion:

Our company is committed to preventing and addressing child labour and forced labour in our supply chains, in alignment with the objectives of Bill S-211. Through our robust policies, due diligence processes, and proactive actions, we strive to ensure that our operations and products are ethically sourced and free from exploitation.

We remain dedicated to continuous improvement and transparency in our efforts to combat child labour and uphold human rights throughout our supply chains.

Appendix:

- HR-12 Child Labour Forced Labour Policy
- HR-13 Whistleblower Policy
- HR-14 Open Door Policy
- HR-20 Human Rights Policy



Bill S-211 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.

Paul Sproule, President

Dated: May 23, 2024

Paul Sproule

Signature

I have the authority to bind The Crump Group Inc.

	Document title: CHILD LABOUR AND FORCED LABOUR POLICY	Doc#: HR-12	Date Created: Oct. 26, 2023
		Department: Human Resources	Date revised
		Approved by: President	Version Number: 1

Objective

This Policy is based on The Crump Groups commitment to find practical, meaningful and appropriate responses to support the prevention and effective elimination of child labour and forced labour practices, in accordance with the principles set forth by the International Labour Organization (ILO) and by the Canada Labor Code and similar legislations in force in each of the provinces of Canada.

Policy

The Crump Group Inc. do not employ any person below the age of eighteen years (18) at any facility.

Crumps Group prohibits the use of child labour and forced or compulsory labour at all its facilities. No employee is made to work against their will or work as bonded/forced labour, or subject to corporal punishment, to threat or coercion of any type in relation to work.

There is a zero tolerance policy towards any breach of this Policy. If The Crump Group ever discovered there was a worker employed by us that was actually under the age of 18 years of age, their employment with us would be terminated effective immediately.

Responsibility

The implementation of the policy is the responsibility of the unit’s Human Resources department, who do not permit minors to enter the production area or the office as workers.


Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at all facilities and are open to verification by any authorised personnel or relevant statutory body.

Periodic assessment may be conducted by The Crump Group; in this context, the Human Resources department may undertake random checks of records no more than on an annual basis

The Crump Group will continuously seek to make the Policy as relevant and as effective as possible. To that effect, The Crump Group may amend this Policy from time to time.

Revision Log:

Rev#	Summary of Changes	Effective Date	Change Control#
1	Initial document	October 26, 2023	

	Document title: WHISTLEBLOWER POLICY	Doc#: HR-13	Date Created: Nov. 1, 2023
		Department: Human Resources	Date revised
		Approved by: President	Version Number: 1

General

The mission and values of The Crump Group require officers, associates and representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The Crump Group insists on:

- integrity in fulfilling its responsibilities;
- treating all individuals with dignity and respect;
- compliance with The Crump Group policies, standards, practices and with applicable laws and regulations.

Definitions

‘Administrator’ means the person designated by the Board to verse the day-to-day administration of this Policy, including receiving, tracking, and reporting to the Board on Incidents reported.

‘Board’ means The Crump Group’s board of directors.

‘Reporter’ means an associate, officer or other person reporting incidents in accordance with this Policy, including but not limited to contract workers, suppliers, business partners, consultants, agents and representatives.

‘Investigator’ means the person or persons designated by the board with responsibility for investigating and bringing closure to reported incidents.

‘Policy’ means this *Whistleblower Policy*

Purpose


The purpose of this policy is:

- to facilitate making disclosures;
- to facilitate the investigation of disclosures;
- to protect those who in good faith make disclosures.

Matters Warranting Disclosure

“Disclosures” include, but are not limited to, information concerning:

- an act or omission constituting a violation of The Crump Group’s policies, standards or practices;
- an act or omission constituting an offence under any provincial/state or federal legislation;
- an act or omission that creates a substantial and specific danger to the life, health or safety of persons or to the environment;
- gross mismanagement.

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Reporting Responsibilities

It is the responsibility of all officers, associates and representatives to comply with the mission and values of The Crump Group in their officership, employment and contractual obligations and to make disclosures when appropriate.

Reporting Incidents


The Crump Group encourages individuals to make disclosures of the ‘Matters Warranting Disclosure’ identified above. Under normal circumstances disclosures should be made directly to management, whose responsibility it is to ensure organizational integrity, compliance and accountability or to Human Resources.

The Crump Group recognizes, for various reasons, it may not always be possible to make disclosures through normal channels and thus has provided a means for reporting such disclosures through the mechanism provided in this Policy through a third-party provider, of confidential, anonymous reporting services, via the internet or by telephone. The third-party provides a website and Ethics Hotline that is accessible from Canada and the United States 24 hours a day, 7 days a week. If a report is submitted anonymously, the identity of the individual raising the concern through the hotline is not known to The Crump Group. The Reporter will be provided with a confidential PIN number that will allow for further anonymous communication through the Ethics Hotline.

Access to incident reports is strictly controlled to prevent interference with, and ensure the independence, effectiveness, and integrity of any ensuing incident investigation. Upon receiving an incident report, the President and Head of People and Culture (Administrator) and our VP, Corporate Affairs (provided such individuals are not related to or the subject of the incident).

Important Note: The Crump Group takes all concerns seriously and will investigate all credible complaints. The third-party provided Ethics Hotline allows the Reporter to provide additional information required by the investigations on an anonymous basis. However, associates should be aware that reporting anonymously through the third-party can limit the ability of The Crump Group to thoroughly investigate a report if insufficient information is provided.

For Incidents that do not fall under those identified above under “Matters Warranting Disclosure” The Crump Group has other options to report incidents. We encourage associates that have a concern, complaint or question to speak to their Supervisor/Manager, Human Resources or to use the Suggestion Box located in the Production area outside of the HR office. Please refer to our Open Door Policy for additional information.

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No Retaliation

The organization will not, in relation to the reporting of any incident under this Policy, permit any form of retaliation or reprisal (including discharge, demotion, transfer, suspension, threat, intimidation, harassment or any other form of discrimination) by any person or group, directly or indirectly, against any Reporter, witness or interviewee who, truthfully and in good faith:

- Reports an Incident in accordance with this Policy;
- Lawfully provides information or assistance in an investigation regarding any conduct which the Reporter reasonably believes constitutes a violation of applicable laws or any company policies;
- Files, causes to be filed, testifies, participates in or otherwise assists in a proceeding related to a violation of applicable laws or any company policies;
- Provides law enforcement officer with information regarding the commission or possible commission of an offence, unless the individual reporting is one of the violators; or
- Assists the Investigator, management or any other person or group (including any governmental or regulatory authority) in the investigation of an incident.

If any person believes that retaliation or reprisal has occurred, that person may submit a complaint pursuant to this Policy after the person knew or ought to have known that the retaliation or reprisal occurred.

Investigation and oversight


The Administrator has been designated by the Board and will serve as the Investigator for Incidents of a general nature that are not more appropriately investigated by another person. Where an incident pertains to a matter more appropriately investigated by another person, The Administrator will consult with the President to assign an appropriate internal or external investigator to investigate the incident. No person will be appointed to investigate an incident where that person is or could reasonably be perceived to be in a conflict of interest, or otherwise impartial or unbiased in conducting the investigation.

The investigator will investigate incidents in an independent, expeditious, and confidential manner, taking care to protect the identity of the persons involved and to ensure that the investigation is not impaired in any manner.

The investigator will contact the Reporter to acknowledge receipt of the incident within 5 business days.

A Reporter who reports an incident through the third-party provider will be assigned a unique case identifier and password and should return to the provider website once 5 business days have elapsed after reporting an incident to assess the response to the report and to answer anonymously any follow-up questions.

All incidents will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

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All persons (including the Reporter) must fully cooperate in the Investigator’s investigation.

The Investigator may involve other persons in the investigation as deemed appropriate (including members of Crumps management team). The Investigator along with the President, may agree to authorize an independent investigation and/or to engage external consultants to assist in the investigation.

The status, and to the extent possible, the outcome, of an incident investigation will be communicated to the Reporter in a timely manner either through direct communication, if the Reporter provided his or her name, or via third-party provider of confidential, anonymous reporting services if the Reporter wishes to remain anonymous. Responses to anonymous reports made via telephone may be accessed through the provider website using the unique case identifier and password provided to the Reporter upon reporting the incident.

Disclosures not made in Good Faith

The Crump Group is concerned about protecting the reputation of its Officers, associates and representatives from false or malicious allegations. The Crump Group will therefore ensure that the necessary resources are provided to investigate any disclosure which it receives.


It is important to understand that The Crump Group will view seriously any disclosure which proves to be false, malicious or of a frivolous nature, and that any person making such a disclosure may be subject to discipline up to and including termination.

Confidentiality and Anonymity

All Incident reports will be treated as confidential, and each report and the identity of the Reporter will be kept confidential to the extent permissible by law and feasible to permit proper investigation and resolution. Reports will only be accessible to people that the investigator determines have a ‘need to know’ and where such access will not otherwise compromise or interfere with the independence, effectiveness, and integrity of the investigation. Ordinarily, a need to know arises from an obligation to investigate or to take remedial action based on the information contained in the incident report. For clarity, sharing incident information in a manner required by this Policy will not be considered a breach of confidentiality.

Reports of incidents must be supported by sufficient information and evidence to enable a proper investigation, particularly in the case of anonymous incident reports, since the investigator may not be able to seek further details from the Reporter, incidents should include:

- the date(s) of the incident(s);
- the identity of individuals and witnesses involved;
- a description of the specific actions or omissions that constitute the Incident;
- how the Reporter became aware of the Incident;
- any steps taken by the Reporter to date with respect to the Incident; and
- any materials or documents relevant to support or evidence of the Incident

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While this Policy facilitates anonymous reporting and protects Reporter anonymity, such measures may hinder the effective investigation of any Incident. Also, as a practical matter, it is possible that the identity of an anonymous Reporter may become known during the investigation or resolution or may be subject to legal disclosure requirements. Therefore, The Crump Group encourages Reporters to only report anonymously where necessary, given the inherent difficulty in properly investigating, following up on, and resolving anonymously reported incidents. If a Reporter remains anonymous and does not provide sufficient detail regarding the incident, the Investigator may not be able to initiate or complete a comprehensive incident investigation.

Retention of Records

Records pertaining to an Incident are the property of The Crump Group and shall be retained; (i) in compliance with applicable laws and The Crump Groups record retention policies; (ii) subject to safeguards and ensure their confidentiality and, when applicable, the anonymity of the Reporter; and (iii) in such a manner as a maximum their usefulness to The Crump Groups overall compliance program.

To protect individuals wishing to bring forward a disclosure anonymously, we have engaged the services of a third-party, Red Flag Reporting who will manage the intake of such disclosures. We strongly encourage associates to provide as much information as possible, understanding that this makes it easier to investigate the disclosure. If requested, anonymity can be secured.


Reporting Mechanism

Toll-Free Telephone Number 1-888-451-3746

Email: redflag@redflagreporting.com

Visit: www.RedFlagReporting.com/Crump

Rev#	Summary of Changes	Effective Date	Change Control#
1	Initial document	November 1, 2023	

	Document title: OPEN DOOR POLICY	Doc#: HR-14	Date Created: Nov. 1, 2023
		Department: Human Resources	Date revised
		Approved by: President	Version Number: 1

Purpose

We want any Crump Group associate who has a concern, complaint or question to have it addressed as quickly and as fairly as possible.

Policy

All Crump associates should receive fair and equitable treatment at all times. If a problem or question arises, it may be taken to any level of supervision or management. Our commitment to associates is there will never be any retaliation or discrimination for voicing concerns through the Open Door Policy.

Procedures

1. Using the Open Door:

Although associates may raise a concern to ANY member of management, the following process is the fastest and at most times the best way for associates to resolve problems.

 - a. First speak with your supervisor or direct manager
 - b. If the issue cannot be resolved, then raise the issue to your department manager or site leader
 - c. If not satisfied with the response from your local management, you may appeal the decision with a member of the management team or to Human Resources
 - d. If not satisfied with the decision, you may appeal to the President


2. On especially sensitive issues that you believe may involve local management you should contact the President, the Head of People & Culture or if you believe the issue falls under the Whistleblower Policy under Matters Warranting Disclosure, then please reach out to our Ethics Hotline at 1-888-451-3746 (toll free), visit www.RedFlagReporting.com/Crump, email redflag@redflagreporting.com

3. Concerns may be made in person, by phone, by mail or by email. There is no requirement that an associate put the concern in writing and no special form is required, although it may sometimes be helpful to document the concern to ensure more effective communication.


4. Management should speak with the associate as soon as is practical to review the matter and provide a response. Or, where additional time is necessary to fully investigate the matter, to keep the associate advised of the estimated amount of time it will take to provide a response as promptly as possible.

Reference:

HR-13 Whistleblower Policy

	Document title: OPEN DOOR POLICY	Doc#: HR-14	Date Created: Nov. 1, 2023
		Department: Human Resources	Date revised
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Rev#	Summary of Changes	Effective Date	Change Control#
1	Initial document	November 1, 2023	

	Document title: HUMAN RIGHTS POLICY	Doc#: HR-20	Date Created: January 11, 2024
		Department: Human Resources	Date revised
		Approved by: President	Version Number: 1

Human Rights and Our Company

Respect for human rights is a fundamental value of The Crump Group Inc. It shapes our relationships with our associates, our expectations of suppliers and our engagement with communities and customers. We embrace the UN Guiding Principles on Business and Human Rights, because they align with our corporate mission and vision.

Our Human Rights Policy reflects our values and will guide our human rights journey. The Policy applies to The Crump Group Inc., The Crump Group USA Inc. and the facilities we manage.

Our Commitment

We commit to the United Nations Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises across our business operations. We respect all internationally recognized human rights enshrined in the International Bill of Human Rights, the International Labor Organization’s core conventions, and the ILO Declaration of Fundamental Principles and Rights at Work.

We recognize the responsibility we have to our most vulnerable stakeholders, including minority communities, woman, migrant workers, and children, among others. We strive to identify and address major human rights risks across our operations. We conduct due diligence and engage with stakeholders to prevent and mitigate risks. We provide and cooperate in access to remedy where appropriate.

The following rights are cornerstones of our program:

Safe and Healthy Workplace


Workers are entitled to a secure, safe and healthy workplace. Within our own operations, we work to minimize the risk of accidents, injury, and exposure to health risks. We do not tolerate harassment, including unwelcome verbal, physical, sexual or other conduct that creates an intimidating or hostile work environment.

Diversity and Inclusion

All workers are entitled to be treated with equal dignity and respect. We work actively to foster diverse, equitable and inclusive workplaces free from discrimination on the basis of race, sex, colour, national or social origin, ethnicity, religion, age, disability, health status, sexual orientation, marital status, pregnancy, gender identity or expression, political opinion, or any other protected category under applicable law.

Freedom of Association

Workers have a right to join or form a labour union without fear of reprisal, intimidation, violence or harassment. Where domestic law unduly restricts freedom of association, we support alternative platforms to enable collective worker dialogue and engagement with management.

	Document title: HUMAN RIGHTS POLICY	Doc#: HR-20	Date Created: January 11, 2024
		Department: Human Resources	Date revised
		Approved by: President	Version Number: 1

Freedom from Forced Labour

We prohibit any and all use of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour or any form of labour trafficking. Terms and conditions of work should be represented in a truthful and clear manner, in a language a worker understands. No one may ever be coerced or deceived, required to pay a fee, or made to surrender their personal documents to secure employment.

Freedom from Child Labour

We prohibit the hiring of anyone younger than 18 years of age to engage in work. We verify the age of all associates at the time they are hired.

Wages and Work Hours

Workers must be fairly compensated in alignment with national law, industry standards and local labour markets. All overtime is paid at an appropriate premium, and all workers are entitled to reasonable rest periods and days off.

Land Rights

We respect communities’ legal and customary property rights. We do not tolerate land grabs, and indigenous communities must be adequately informed and properly consulted in the land acquisition process, in line with the principle of Free, Prior and Informed Consent.

Water and Environmental Stewardship


We take human rights-based approach to water that mitigated risk by assessing local water risks; consulting and partnering with governments, communities, and other stakeholders to develop water-stress solutions; and, when needed, implementing source-water protection plans. We work actively to minimize our environmental impacts and to reduce our carbon footprint through science-based targets. We also help to promote and protect natural habitats, protected areas and biodiversity, including through approaches that build resilience to shocks and longer-term client stressors.

Privacy

We respect the privacy rights of individuals and implement reasonable safeguards to protect personal and confidential information with which we are entrusted, in accordance with our privacy policies.

Customer Wellbeing

Our commitment to human rights extends to our customers. We are committed to responsible marketing and to providing transparent and accessible nutritional information and a range of treat options that enables customers to make informed choices.

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Governance and Implementation

This Policy is overseen by our President with support from the Head of People & Culture. The President provides updates to the Board on any risks, performance, and evolving expectations.

The Head of People & Culture works across the Company to develop policies and programs, implement human rights due diligence, engage stakeholders, and conduct human rights training.

Grievance and Remedy

In line with the UN Guiding Principles on Business and Human Rights, we work to ensure access to appropriate remedies for anyone who suffers an adverse human rights impact linked to our operations. Our Ethics Hotline through Red Flag Reporting allows anyone, whether an associate, worker in our supply chain, a member of an impacted community or any other person, to report human rights or ethics concerns. Reporting information is provided below. Complaints and grievances can be filed anonymously. We investigate and take appropriate corrective action in response to any violations.

- Visit www.RedFlagReporting.com/Crump
- Call **1 (888) 451-3746**
- You may also use the following (be sure to be detail oriented, provide our organization’s name, and indicate if you wish to be anonymous or not):
 - Email to redflag@redflagreporting.com
 - Fax to **330-572-8146**
 - Mail to **RFR, P.O. Box 4230, Akron, Ohio 44321**

Reference

Code of Ethics and Business Conduct
 HR-1 Workplace Violence and Harassment Policy
 HR-11 Anti Bribery and Anti-Corruption Policy
 HR-12 Child Labour Forced Labour Policy
 HR-13 Whistleblower Policy
 HR-14 Open Door

Revision

Rev#	Summary of Changes	Effective Date	Change Control#
1	Initial document	January 11, 2024	