



Titan Land & Cattle Ltd.

Forced Labour and Child Labour in Supply Chains Company
Assessment

Table of Contents

Background.....	2
Introduction	3
Structure, Activities & Supply Chain.....	3
Due Diligence	3
Risk Assessment.....	4
Remediation of Forced Labour & Child Labour	4
Remediation of Vulnerable Family Income Loss	5
Assessing Effectiveness	5
Steps Taken To Prevent and Reduce the Risk of Child Labour or Forced Labour.....	5
Conclusions & Recommendations for Management.....	5
Attestation.....	6



Background

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced through Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff ("the Act"), aim to increase industry awareness and transparency and drive businesses to improve practices. The Act requires entities to report on the steps taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity. There are seven mandatory reporting areas that must be investigated and reported on which include:

- Its structure, activities and supply chains.
- Its policies and due diligence processes in relation to forced labour and child labour.
- The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.
- Any measures taken to remediate any forced labour or child labour.
- Any measures taken to remediate the 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.
- The training provided to employees on forced labour and child labour.
- How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.



Introduction

This report is Titan Land & Cattle Ltd. (“TLC” or “Entity”) response to Bill S-211, an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), sections 11(1) and 11(3).

TLC satisfies the definition of an Entity within the Act by having a place of business in Canada, doing business in Canada, having assets in Canada and meeting both the revenue and asset thresholds.

The financial reporting year of TLC covered by this report is for the year ending March 31st, 2024.

Structure, Activities & Supply Chain

TLC operates as a corporation (Business Number 132612722) at 310 – 101 Riel Drive, St Albert, Alberta, Canada. Operations of TLC are within the agriculture industry, specializing in cattle distribution.

TLC does not directly employ personnel but instead contracts personnel from a related company, outside the scope of this compliance report. As a result, there are no specific policies governing the conduct and expectations of a workforce or, employee training provided by TLC. As describing policies and training per the Act, these sections are therefore not applicable and have been removed from this report.

TLC operates within the agriculture industry, buying cattle from farmers, auction marts and through brokers predominantly within Canada. Cattle are custom fed within external feed yards located in Canada and the US. Once size specifications are met, these cattle are distributed to slaughterhouses and meat markets across Canada, with some sales to the United States. The Entity also ensures that animal welfare is kept top priority by monitoring feed and water intake.

Many of the TLC cattle are fed at facilities that are Verified Beef Production Plus (VBP+) certified, adhering to strict standards related to animal care, environmental stewardship and food safety. Using vendors that have obtained this certification reflects the responsible initiatives that TLC pursues to ensure sustainability across the Entity’s supply chain.

Due Diligence

When purchasing cattle, TLC requires suppliers to adhere to a sales contract including terms and conditions. Clauses within this document relevant to this Act include requiring suppliers to adhere to the laws of Alberta therefore, including those that relate to labour standards. These contracts do not contain clauses identifying expectations in regard to child labour and/or forced labour however, TLC is considering the addition of this matter.

When considering new suppliers, and monitoring existing suppliers, TLC assesses factors such as community reputation, past performance, commodity pricing, and delivery likelihood when selecting



suppliers.

TLC recognizes the opportunity to enhance supplier due diligence as it relates to this Act and is continuing to better understand their supply chain to assess this risk.

Risk Assessment

A risk assessment over TLC's industry of operation, goods procured, and countries goods are procured from has been performed over material direct suppliers. The risk assessment used two separate indices to conclude on inherent risk of child and / or forced labour related to goods and countries – Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Procured by Child Labor or Forced Labor.

Industry of Operation

TLC operates within the agriculture industry. Given the two indices noted above have identified risks of child labour and forced labour inherent to agricultural products, it is concluded that this industry has an inherent risk exposure.

Goods Procured

A risk assessment over the goods procured from suppliers has been conducted and identified an initial inherent risk of forced and / or child labour within cattle. All other remaining goods were not included in either indices therefore, TLC concludes that these remaining goods have a low inherent risk of child labour or forced labour.

Countries Which Goods Are Procured From

For the purposes of a risk assessment over countries goods are procured from, this report focuses on direct suppliers only. TLC procures goods mainly from Canadian suppliers, though will also use suppliers within the United States. Both indices have identified these countries as having a low inherent risk to the use of child and / or forced labour.

This does not mean that no evidence of forced labour or child labour was found to support this risk analysis but that there is an inherent low risk and continued due diligence is required.

Remediation of Forced Labour & Child Labour

To reduce the risk of child labour or forced labour within TLC's activities and supply chain, the Entity will continue to use supplier contracts, including terms and conditions suppliers are to adhere to. TLC has identified the opportunity to enhance these terms and conditions to align with the Act.

TLC also commits to continue conversations and engagement with existing suppliers, incorporating discussions relevant to this Act. TLC is in the process of evaluating and understanding its supply chain to



assess the risks related to this Act.

Remediation of Vulnerable Family Income Loss

To date, there have been no instances identified by TLC of forced labour or child labour within their activities or supply chains. Therefore, the Entity has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in their activities or supply chains.

Assessing Effectiveness

To track TLC's effectiveness of procedures to mitigate the risk of child labour and forced labour, the Entity will continue to conduct supplier monitoring. Though not a formal process, discussions will continue to exist with suppliers regarding issues that may impact TLC's supply chain. TLC has identified the opportunity to incorporate discussions with suppliers, related to this Act.

Steps Taken To Prevent and Reduce the Risk of Child Labour or Forced Labour

TLC has taken the following steps to prevent and reduce the risk of child labour or forced labour:

1. Mapping supply chains: TLC has identified components of the Entity's supply chain including who the suppliers are, country of origin, as well as the good supplied.
2. Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains: As part of this report, both entities have identified risks within their activities and supply chains that have inherent risks of child labour and/or forced labour.
3. Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains: TLC uses a supplier contract, including terms and conditions, for cattle procurement. TLC has identified the opportunity to enhance this document to align with the Act.

Conclusions & Recommendations for Management

In preparation of this report, we have identified an opportunity related to supplier due diligence processes, for the Entity to enhance controls and activities related to Forced Labour and Child Labour:

- Supplier Due Diligence: It is recommended that supplier due diligence mechanisms be an area of



focus for the Entity moving into the second year of compliance reporting for this Act. Should specific examples or guidance on these exercises and tools be requested, we would be more than happy to assist the Entity in their development.

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 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.

Garth Andruchow

Garth Andruchow

Full Name

Signature

CFO

May 21, 2024

Title

Date

I have the authority to bind Titan Land & Cattle Ltd.