



Titan Livestock Holdings Inc.

Forced Labour and Child Labour in Supply Chains Company
Assessment



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Executive Summary

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.

These 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 steps 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 Livestock Holdings Inc.'s 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).

The entities covered by this report are Titan Livestock Holdings Inc. ("TLHI"), Titan Livestock Inc. ("TLI"), and Danger Zone Repair Inc. ("Danger Zone").

The Entities satisfy 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 Entities covered by this report is for the year ending December 31, 2023.

Structure, Activities & Supply Chain

TLHI (Business Number 704459122) operates as a holding company, and controls, for the purposes of this Act, TLI and Danger Zone. There are no activities within TLHI relating to goods therefore, the remainder of this report will focus on TLI and Danger Zone, collectively, the Entities.

TLI (Business Number 820564987) operates as a corporation in St. Albert, Alberta. Working within the agriculture industry, TLI's main business activity is buying and selling cattle within the commodity market.

TLI procures cattle directly from farmers, auction marts and through brokers. These purchases are made through suppliers within Canada and the United States.

Danger Zone (Business Number 718809601), operates as a corporation in St. Albert, Alberta. Danger Zone's activities involve performing heavy-duty trucking repairs. Procurement of Danger Zone is focused on repair parts and supplies, purchased through Canadian suppliers.

Policies & Due Diligence

The Entities have the following policies and due diligence procedures in place to mitigate the risk of child labour and forced labour within internal activities and their supply chain:

Internal Policies

Workplace Harassment & Violence Prevention Policy

This policy indicates zero-tolerance for abuse of any form within the workplace. This policy applies at every level of the organizations and, to every aspect of the employer-employee relationship – from recruitment to termination of employment.

This policy specifically speaks to the Entities ensuring employees do not take part in unsafe or untrained duties or, force work if an employee is sick or injured.

Within the policy are examples of violence or harassment and the request for employees to report any experience or behaviour related to these immediately. A step-by-step conflict resolution process is also



defined, including a reprisal clause to ensure any employees acting in good faith will not be penalized.

Any employees found in violation of this policy may be subject to disciplinary action up to and including termination of employment and the Entities may take legal action in accordance with the law depending on the circumstances.

Health & Safety Policy

The Entities Health & Safety Policy indicates an overarching commitment to protect its employees, contractors, visitors, and general public who enter the property. The policy also states that all levels of employees (i.e., management, supervisors, and staff) are actively responsible and accountable for each other's safety while employed with the Entities. Management and supervisors are expected to set examples, expectations, and communicate safe work practices including employee training and providing appropriate equipment.

Any employees found in violation of this policy may be subject to disciplinary action up to and including termination of employment and, the Entities may take legal action in accordance with the law depending on the circumstances.

Health & Safety Rights & Responsibilities Policy

This policy defines the responsibilities of the Entities and employees regarding workplace health and safety. The document intends to foster open communication regarding any health and safety concerns at work and that all employees are properly informed of legal and regulatory requirements and standards. The document outlines three key employee rights – the right to know (about potential hazards), the right to participate, and the right to refuse (unsafe work). Examples of the Entities responsibilities include ensuring employee safety and welfare while on a worksite, providing effective training to protect employees and to deliver training for employees to effectively perform their duties.

Any employees found in violation of this policy may be subject to disciplinary action up to and including termination of employment and TLI may take legal action in accordance with the law depending on the circumstances.

Employee Onboarding Process

When onboarding new employees, the Entities review each of the policies noted above, to ensure they are understood by the individual. Employees are required to sign these policies at the time of onboarding, or when a change is made, to reflect understanding and adherence.

Due Diligence Processes

Terms and Conditions

As part of TLI's sales contracts, terms and conditions are included. Specifically, TLI requires suppliers to adhere to the laws of the Province of Alberta therefore, ensuring compliance with relevant legal frameworks and regulatory standards within Alberta.

Supplier Monitoring

When considering new suppliers, and monitoring existing suppliers, the Entities assess factors such as



community reputation, past performance, commodity pricing, and delivery likelihood when selecting suppliers.

Both Entities recognize 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 of the Entities 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 the 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

TLI

TLI 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.

Danger Zone

Danger Zone operates within the automotive repair and maintenance industry. This industry has not been identified as an industry with an inherent risk exposure, based on the two indices.

Goods Procured

TLI

TLI procures agriculture products. A risk assessment over the goods procured from material suppliers noted above has been conducted and identified an initial inherent risk of forced and / or child labour within the category of cattle. All other remaining goods were not included in either indices therefore, conclude that they have a low inherent risk of child labour or forced labour.

Danger Zone

Danger Zone procures parts and supplies used to perform heavy truck, trailer, and agriculture equipment repairs and maintenance. The indices above have not specifically identified these goods as having an inherent risk exposure to child labour or force labour.

Countries Which Goods Are Procured From

For the purposes of a risk assessment over countries goods are procured from, this report focuses on the direct suppliers only, specifically, the countries of head offices and direct business locations that TLI and Danger Zone purchases from.

Titan procures goods from suppliers within Canada and the United States. Danger Zone procures parts from Canadian Suppliers. Both indices have identified these countries as having a low inherent risk to the use of child and / or forced labour.



Remediation of Forced & Child Labour

To reduce the risk of child labour or forced labour within the Entities activities and supply chain, both will continue to have conversations and engage with suppliers on the subject. Where sales contracts are used, TLI includes terms and conditions which require suppliers to adhere to the local laws of Alberta. TLI has identified the opportunity to enhance these terms and conditions to require suppliers to adhere to all laws and regulations pertinent to the countries and regions in which they operate, not just within Alberta, as well as the addition of specific clauses identifying expectations regarding child labour and/or forced labour.

Both Entities have identified the opportunity to enhance policies and due diligence mechanisms to reduce the risk of child labour and forced labour within their activities and supply chain.

Remediation of Vulnerable Family Income Loss

To date, there have been no instances identified by the Entities of forced labour or child labour within activities or supply chains. Therefore, the Entities have 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.

Awareness Training

Both Entities do not have explicit training in place on the topic of child labour or forced labour. However, of the policies identified above relevant to this Act, the Entities do incorporate mandatory training for new employees regarding the policies above, among others.

When onboarding new employees, part of this process includes reviewing the Workplace Harassment & Violence Prevention Policy, Health & Safety Policy, and, Health & Safety Rights & Responsibilities Policy – each including content relevant to this Act.

Further awareness regarding employee safety is facilitated through regular safety meetings and quarterly sessions aimed at reinforcing safety protocols and fostering open communication with staff regarding workplace safety and incidents.

The Entities are exploring opportunities to provide training to all employees in identifying, assessing, and responding to risks of child labour and forced labour within activities and supply chains.

Assessing Effectiveness

To track the Entities effectiveness of procedures to mitigate the risk of child labour and forced labour, the following mechanisms are in place:

1. Policy review: Both Entities have committed to reviewing and updating relevant policies on a frequent basis to ensure relevance and accuracy based on the current operating conditions in



accordance with the Act.

2. Total workplace safety incidents: The Entities perform monthly safety meetings to review and discuss all safety-related concerns, incidents and workplace hazards in an effort to remediate and minimize incidents.
3. Total harassment incidents: Both Entities have a zero-tolerance for workplace harassment. All claims made regarding harassment will be reported to management and promptly investigated.
4. Conduct and behaviour incidents: Both Entities have a zero-tolerance for inappropriate conduct and behaviour. All claims made regarding this will be reported to management, including an action plan to resolve the issue in a timely manner.
5. Employee training: Both Entities will continue to track employee training completion metrics to ensure the completeness of relevant training.

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

The Entities have taken the following steps to prevent and reduce the risk of child labour or forced labour:

1. Mapping supply chains: As part of this report, the Entities have mapped their supply chains to complete a risk assessment to align with the Act.
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: See policies and due diligence processes section – both Entities have identified processes in place.
4. Developing and implementing training and awareness materials on forced labour and/or child labour: Both Entities have identified the opportunity to implement training content related to this Act for employees.
5. Developing and implementing procedures to track performance in addressing forced labour and/or child labour: Both Entities have identified methods of assessing effectiveness in addressing forced and/or child labour within internal activities.

Conclusions & Recommendations for Management

In preparation of this report, we have identified opportunities for both Entities to enhance controls and activities related to Forced Labour and Child Labour within the organization and supply chains. These include:

- Internal Policies: It is recommended that content related to this Act be integrated within existing



internal policies. Also, it is recommended that employees sign off on these policies annually to reflect their understanding and adherence to expectations;

- Employee Training: It is recommended that employee training on the topic of child labour and forced labour be implemented into existing employee training programs;
- Terms and Conditions: It is recommended that the existing Terms and Conditions, also include the expectation that suppliers will adhere to local laws of each country wherein the supplier operates. Currently, suppliers are expected to adhere to the laws of the Province of Alberta; and
- Supplier Due Diligence: It is recommended that supplier due diligence mechanisms be an area of focus for the Entities 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 Entities 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 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.

Garth Andruchow	<i>Garth Andruchow</i>
Full Name	Signature
CFO	May 21, 2024
Title	Date

I have the authority to bind Titan Livestock Holdings Inc., Titan Livestock Inc. and Danger Zone Repair Inc.