



Modern & Human Trafficking Slavery Statement

This document constitutes Tradition Fine Foods Ltd.'s (Tradition or the Company) **Modern Slavery Act Statement (Statement)**, covering our fiscal year of December 31, 2023 to January 1, 2025. This Statement is made on behalf of Tradition pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024* (the Act) to prevent modern slavery, including forced labour and child labour, and human trafficking in our business operations and supply chains. This statement has been approved by the Company's Owners.

Who are we

Tradition is a wholly Canadian owned private company that supplies North American companies and brands with a variety of bakery and snack products. We are rooted in family values as our guideposts, reflecting how we conduct business with our team members, our customers and vendors/suppliers. These values are front and center every day guiding our decisions and actions.

Our Commitment to Human Rights

We are committed to respecting and protecting human rights - this is foundational to how Tradition conducts business. We do not tolerate modern slavery, including forced labour and child labour, or human trafficking in our business or supply chains. We uphold human rights by promoting a fair, diverse and inclusive work environment, and by acting with honesty, integrity and respect in accordance with the Tradition Code of Conduct (the "Code"). We recognize that in all its forms, modern slavery, including forced labour and child labour, and human trafficking are violations of fundamental human rights and continue to monitor and mitigate these risks in our business activities and supply chains.

Our Supply Chain Structure

Tradition is located in Scarborough, Ontario. Our corporate office and manufacturing facilities are located at this single site.

Our Supply Chain team is situated in our corporate office and we engage with third parties for provision of goods and services.

We procure goods and services from a range of third-parties including but not limited to ingredients, packaging, information technology, telecommunications, banking, accounting and legal services, human resources firms, equipment vendors, transportation, storage, mail services, research and analytics, marketing and advertising, consulting services, and office supplies. In some circumstances we procure tangible goods for distribution such as promotional and branded t-shirts, pens, etc. We import goods both directly and indirectly through our customers supply chain. The majority of third-parties that Tradition procures goods and services from are based in North America, with a minority of goods and services purchased from third-parties in China, South America, New Zealand and Europe.

Date issued	February 1, 2024
Policy Owner	Marianna Agostino, VP Human Resources Catherine Glowczewski, VP Corporate Affairs



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Modern Slavery Risks in Operations and Supply Chain

1. People Risks

The overall risk that our operations may cause or contribute to modern slavery with respect to our workforce is low, given our largely skilled and experienced workforce and integrated approach to human rights. We are committed to providing a safe, fair and respectful workplace and have robust human resources policies and procedures that support the protection of human rights. Additional information about our People policies can be provided upon request.

2. Customer Risks

As a co-manufacturer we provide goods and services to clients in North America. Our overall risk to modern slavery, including forced labour and child labour, human trafficking and other violations of human rights is relatively low as our customer base is in the US and Canada. Both countries have strict legislation in place to protect against violations of Human Rights. Adherence to human rights legislation in these countries is relatively high.

We have implemented a Supplier Code of Conduct acknowledgement process with our top 25 direct suppliers that outlines our ethical expectations in the areas of employees, business conduct, environmental protection, food safety and quality. This program will be expanded in 2025 to include more suppliers.

3. Supply Chain Risks

We have a procedure in place, which includes Supplier Approval Monitoring Program and adherence to the Supplier Code of Conduct, to manage potential risks related to our third-party relationships including subcontractor/supply chain. Traditions' Supplier Code of Conduct outlines the structured process for the effective identification, assessment and mitigation of risk and the ongoing monitoring and oversight.

We recognize certain examples of business activities with heightened risk exposures such as:

- a. Procuring goods and/or services from suppliers or vendors required by the customer
- b. Procuring goods and/or services from countries outside of Canada

How We Identify and Address Modern Slavery Risks

As part of our due diligence process we leverage the Supplier Approval Monitoring Program which includes Food Safety, Food Defence, Food Quality & Safety and Ethical Behaviours. We review and assess salient human rights impacts in our workplace and throughout our operations, including our supply chain activities. We expect our team members, customers, suppliers and other third-parties with whom we have a business relationship to share our commitment to respect human rights. Across Tradition we have strong policies, procedures and frameworks in place, and are working to prevent modern slavery, including forced labour and child labour, human trafficking and other human rights violations by taking the measures outlined in this statement.

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Key Policies Supporting Modern Slavery Prevention in our Business and Supply Chains

- Tradition Code of Conduct
Supplier Code of Conduct
- Supplier Approval Monitoring Program

Our People

Our Code of Conduct (the “Code”) is our foundation. It identifies policies that guide our actions and lays out the standards we have in place for how team members should behave and treat our fellow team members, customers and vendors. This includes acting with honesty and integrity and respecting human rights.

Our Customers

How to Report Concerns and Complaints

Resources are available for resolving workplace issues and investigating allegations of human rights violations. Team members must immediately speak up when something does not seem right. This includes concerns about activities we believe are inconsistent with the Code or that might be damaging to Tradition or our customers. In accordance with the Code, no one may suspend, discharge, discriminate against, harass, threaten or otherwise retaliate against a team member or other person in any way for reporting in good faith any actual or possible misconduct, or providing information for, or participating in, an investigation.

Our team members can raise concerns through a variety of mechanisms, through our HR team via email or phone call.

Training and Awareness

Team members must demonstrate their understanding of human rights risks by completing training courses on topics such as: respect in the workplace, sexual harassment awareness, health and safety and violence prevention.

Our customer/supplier-facing teams receive training related to human trafficking. This includes awareness of how human trafficking intersects with the manufacturing industry, how to recognize the signs, and how to report suspected incidents for investigation. This is delivered through self-paced training where team members learn to recognize indicators and scenarios of trafficking and how they manifest.

The Company will retain a copy of this Policy and any revised version of this Policy for a period of three (3) years after it ceases to be in effect.

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Assessing the Effectiveness of our Actions

Responsibility for human rights is shared across functional groups. We seek to assess the effectiveness of our actions in conjunction with internal and external stakeholders by tracking our progress to respond to modern slavery risks, including forced labour and child labour, in our operations, business activities and supply chains. We are committed to continuously improving our approach to human rights and continue to assess and refine key performance indicators that measure progress in operationalizing our commitments. To assess the effectiveness of our approach to social risks, we consider input from relevant internal and external stakeholders, including customers, suppliers, vendors and community representatives. The effectiveness of our programs is regularly evaluated to confirm each remains current and aligned with business activities, regulatory developments, industry standards and best practices.

Examples of activities used to assess the effectiveness of our actions include:

- Identifying new and emerging issues by engaging with customers and vendors.
- Ongoing monitoring of reports received related to modern slavery claims, including forced labour and child labour, made through our reporting channels.

Process of Consultation and Approval

Our Modern Slavery and Human Trafficking Statement is evaluated annually against best practices and updated in collaboration with relevant corporate areas, including Supply Chain, Finance, Human Resources, Corporate Affairs and external counsel as required.

This statement operates company-wide was approved by the President on February 1, 2024.

In accordance with the requirements of the Canadian 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 Canadian Act, for the reporting year listed above.

Tradition Fine Foods Ltd.



Thomas Glowczewski
President

I have the authority to bind Tradition Fine Foods Ltd.

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