

Trophy Foods Inc.

Modern Slavery Act Report (Fiscal Year 2023)

Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211) requires that Canadian businesses state actions they have taken during their last fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain.

This report highlights steps taken by Trophy Foods Inc. for its latest fiscal year (Fiscal Year 2023: July 1, 2022 to June 30, 2023).

1) Trophy Foods Inc. structure, activities and supply chain

Trophy Foods Inc. is Canadian owned and operated with over 50 years of experience in proudly serving our customers. We produce edible nuts, dried fruits, confectionery, and bulk foods under our Trophy brand. We also work with grocery retailers, mass merchandisers, drug channel, and food service customers across the country to create and produce a wide variety of private label branded products.

We source with care and integrity. We keep ourselves accountable to exceptional standards and provide unparalleled quality, traceability, reliability and value thanks to our deeply embedded strategic relationships with growers and suppliers around the world. We count on our network of suppliers to understand and uphold our standards of conduct and operating principles. We hold both ourselves and our suppliers accountable through various Codes of Conduct to ensure our commitment to ethical sourcing standards and human rights are consistently met.

Trophy Foods Inc. is committed to preventing and reducing the risk of forced and child labour across our network of facilities, business partners, and our supply chain. We expect our business partners and our suppliers to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

2) Trophy Foods Inc. policies and due diligence processes in relation to forced labour and child labour

Trophy Foods is committed to respecting and enforcing human rights. Our Codes of Conduct for employees and suppliers, as well as policies and compliance standards, set out responsibilities and expectations to protect and respect the human rights of employees.

Employee Code of Conduct

Trophy Foods' Employee Code of Conduct reinforces our commitment to integrity and accountability. Respecting and protecting human rights are embedded within our Employee Code of Conduct. The Employee Code of Conduct is managed by the Human Resources department and is reviewed annually and updated as necessary.

Supplier Code of Conduct

Trophy Foods' supplier relationships are guided by our Supplier Code of Conduct. It applies to both domestic and international vendors that supply goods and services to Trophy Foods. By entering a contract with Trophy Foods, suppliers accept the terms of the Supplier Code of Conduct and affirm compliance with its requirements.

Trophy Foods' Supplier Code of Conduct sets expectations and guidelines for suppliers and obliges them to comply with applicable laws, including those regulations related to forced and child labour. Trophy Foods keeps records of all our supplier contracts. The Supplier Code of Conduct is managed by the Procurement department and is reviewed annually and updated as necessary.

3) Potential risk of forced labour or child labour being used, and steps being taken to assess and manage that risk.

Trophy Foods is aware that a portion of our global sourcing may present a risk of forced labour and child labour, particularly in connection with food products sourced internationally. We monitor media reports related to any specific risk of forced or child labour in connection with the products we sell.

Our Supplier Code of Conduct is designed to mitigate this risk through provisions and expectations related to forced and child labour with a commitment to preventing and reducing this risk. While the Supplier Code of Conduct has required all suppliers to maintain policies and procedures relating to forced labour and child labour since its inception, in 2023 following the end of our fiscal year, we included additional specificity to prohibit any forced labour and child labour for youth under 18 years of age. We continuously review the Supplier Code of Conduct to determine if an expanded scope of the program is necessary.

4) Measures taken to remediate any forced labour or child labour, and 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.

To date there have been no reported or identified instances of forced labour or child labour in our supply chain, and we have therefore taken no measures to remediate them.

5) The training provided to employees on forced labour and child labour within Trophy employment.

The Employee Code of Conduct, which is reviewed and updated on an annual basis, is provided to all employees of Trophy Foods. Training and discussion regarding the Employee Code of Conduct includes explanations and expectations related to human rights. Where employees work directly with suppliers, they are instructed to familiarize themselves with the Supplier Code of Conduct, including the obligations regarding forced labour and child labour, and to ensure suppliers understand what is expected of them.

6) Trophy Food's actions and assessments in ensuring that forced labour and child labour are not being used in its business and supply chains.

We conduct annual reviews of Supplier Code of Conduct, and review of other supplier / customer contracts, as required, to address potential risks associated with forced labour and child labour. All suppliers (existing and new) are provided with Supplier Code of Conduct on an annual basis.

Furthermore, Trophy Foods is engaged with government, industry, and association peers to continuously improve ESG initiatives which include efforts to respect and protect human rights. Trophy Foods collaborates with specific key customers on audits to ensure human and employee rights are being met, as well as assessments of our supply chain which cover business ethics, respect for workers, child and forced labour, equal employment, and occupational health and safety.

Attestation

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report for Trophy Foods. 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.



Bruce H. Mitchell

Director
Trophy Foods Inc.
May 30, 2024