



Vanee Farm Centre Inc. 2023 Modern Slavery Report

MODERN SLAVERY REPORT 2023

VANEE FARM CENTRE INC.



This Modern Slavery Report (the “Report”) addresses the period from February 1, 2023 to January 31, 2024 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “Act”).

This Report is made on behalf of VANEE FARM CENTRE INC (“VANEE FARM CENTRE INC”) and certain of its subsidiaries (collectively, “we”, “us” or “our”). A French version of this Report may be requested from VANEE FARM CENTRE INC. by emailing LETHOFFICE@VANEEFARMCENTRE.CA.

INTRODUCTION

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the agricultural equipment industry, VANEE FARM CENTRE INC recognizes the important role that we have in ensuring that the supply chains that support our operations and products, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by VANEE FARM CENTRE INC or of goods imported into Canada by VANEE FARM CENTRE INC.

OUR BUSINESS

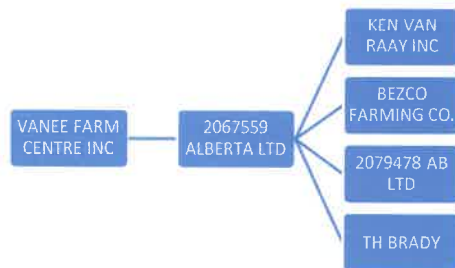
Activities

VANEE FARM CENTRE INC is a New Holland equipment dealer with headquarters based in Lethbridge, Alberta, Canada. As a corporation, we distribute agricultural equipment, including tractors, planting and seeding equipment, and harvesting equipment, as well as provide parts, attachments, and services to support our products. Our online store at www.vaneefarmcentre.ca allows customers to purchase products directly from our website. We primarily serve farms and agricultural businesses in Southern Alberta and Western Canada, although we also occasionally supply equipment to other distributors in the country.

At Vanee Farm Centre Inc, our mission is to empower farmers, from small family operations to large commercial farms, by providing a comprehensive range of high-quality agriculture and construction equipment, parts, and services. As a trusted partner of New Holland for over 50 years, we are committed to delivering exceptional service, prompt solutions, and unparalleled expertise to ensure our customers' success and prosperity.

Structure

VANEE FARM CENTRE INC is owned 100% by 2067559 Alberta Ltd. 2067559 Alberta Ltd is a privately held corporation with four owners who make up the Board of Directors.



We operate FOUR physical locations in CANADA, all of which are situated in ALBERTA. Each physical VANEE FARM CENTRE INC location has a store manager and department managers who are responsible for each functional department. All our employees are non union employees and are directly employed by VANEE FARM CENTRE INC. On January 31, 2024, the reporting period end date, VANEE FARM CENTRE INC employs 63 full time and 4 part time staff, all located in Canada.

OUR SUPPLY CHAIN

VANEE FARM CENTRE INC's supply chain includes businesses that supply agricultural parts and equipment, and supply services to our organization. We receive goods from our suppliers in their final form and require a final PDI inspection. Most of our direct suppliers are North American-based agricultural equipment manufacturers and distributors, who are based in Canada. Our supply chain also includes businesses that are based in other parts of the world such as United States of America. VANEE FARM CENTRE INC maintains direct relationships with its key manufacturers.

We maintain our facilities, vehicle fleets and procure supplies such as tooling, oils and other consumables, office supplies, IT and communications equipment and software to facilitate operations. VANEE FARM CENTRE INC uses various professional services to assist in our operations such as legal, engineering, and other consultants.

OUR POLICIES

Policies

Through our due diligence policies, we communicate our values and expectations, setting a high bar for ourselves and for our suppliers, and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations, or in the operations of our suppliers, subcontractors and other business partners. We make every effort, including through carrying our due diligence and audits to monitor the performance of our suppliers, to prevent our activities having a negative impact on human rights. Our relevant policies are discussed in further detail below:

Supplier Code of Conduct

VANEE FARM CENTRE INC's Supplier Code of Conduct sets out the expectations we have of our suppliers, their supply chains, and those with whom we do business. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Code of Conduct in their own operations and supply chain.

We expect our suppliers to adhere to the same high standards of ethics and responsible business practices that we uphold. Our Supplier Code of Conduct outlines our commitment to preventing forced and child labor, and requires suppliers to conduct thorough due diligence to identify and address such risks. We also expect suppliers to prioritize diversity and inclusivity in their supply chains and commit to these principles as a condition of doing business with us. Our Supplier Code of Conduct is reviewed annually to ensure it remains current and aligned with best practices.

Code of Business Conduct and Ethics

We are committed to conducting our business in a lawful and ethical manner. Our Code of Business Conduct and Ethics is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, VANEE FARM CENTRE INC

employees should always act lawfully, ethically and in the best interests of VANEE FARM CENTRE INC.

Whistle Blower Policy

VANEE FARM CENTRE INC's Whistle Blower Policy encourages employees to report any suspected illegal activities, fraudulent practices, or regulatory violations. Employees can report such concerns to the General Manager or Human Resources Manager, and all reports will be investigated promptly. The company promises not to retaliate against employees who report violations in good faith, participate in investigations, or exercise their rights under provincial or federal laws.

Supervisors will be trained on this policy and VANEE FARM CENTRE INC'S prohibition against retaliation in accordance with this policy.

Health & Safety

VANEE FARM CENTRE INC's health and safety program is a critical component of ensuring a healthy and safe work environment for all employees, while also promoting our commitment to preventing modern slavery. As part of our comprehensive training program, employees are required to participate in mandatory training sessions that cover essential health and safety policies, including:

- Employer, supervisor, and employee-specific policies
- Reporting systems for documenting hazards, near-misses, and incidents
- Policies addressing violence, harassment, discrimination, and bullying
- Parental and sick leave policies

Due Diligence

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

We acknowledge that employees working in our facilities and our supply chain are at potential risk of forced labour or child labour. In order to mitigate this risk, we follow a due diligence approach that includes supplier visits, supplier attestation and third party audits.

Hiring Policies

At Vanee Farm Centre, we maintain a transparent and open hiring process, providing applicants with clear information about the tasks and responsibilities they will be expected to perform, as well as the working conditions associated with their role. We also prioritize ongoing communication and evaluation through regular salary and performance reviews, ensuring a fair and equitable work environment.

ASSESSING OUR RISK IN SUPPLY CHAIN

Our risk of forced labor and/or child labor is higher when we partner with third-party providers, particularly in industries like transportation, warehousing, construction, manufacturing, packaging, and agriculture.

VANEE FARM CENTRE INC regularly reviews its operations and assesses its supply chain for potential modern slavery risks, particularly in high-risk areas. We evaluate the scope and effectiveness of our suppliers' due diligence efforts, including their reporting of modern slavery issues and measures to mitigate risks. This includes reviewing their policies, health and safety practices, and compliance with labor and employment laws to ensure they are addressing modern slavery concerns.

VANEE FARM CENTRE INC operates in CANADA and our core suppliers are predominantly North American based. These jurisdictions have robust pre-existing labour, employment and human rights legislations that mitigate the risk of modern slavery in our operations and supply chains. This is enhanced by our own governance framework, as set out in this Report.

In the event that VANEE FARM CENTRE INC becomes aware of any actions or conditions within its supply chain that are not in compliance with our standards, VANEE FARM CENTRE INC's expectation is that the supplier implement corrective measures. Continued non-compliance may lead to additional remediation actions, including termination of the business relationship.

OUR COMMITMENTS

Steps Taken 2023

VANEE FARM CENTRE INC has taken the following steps during the 2023 financial year ended Jan 31, 2024 to prevent and reduce the risk that forced labour or child labour is used at any step of the production of the company's goods:

- We have shared our policies and expectations with our vendors and suppliers and conducted a detailed and thorough risk assessment of our primary suppliers and partners to understand their compliance level;
- Continuing to implement the policies and due diligence processes described in this Report;
- Requiring that all existing and new company employees have read and are complying with the Company's Code of Conduct;
- Undertaking an engagement survey to solicit feedback from all employees regarding working conditions at VANEE FARM CENTRE INC

VANEE FARM CENTRE INC intends to continue to review and update its policies, procedures, and processes to ensure that it maintains appropriate safeguards against the risk of forced labour and child labour in business and supply chains. The Company will also continue to implement its training processes to ensure that all employees are empowered to identify and report any suspected instances of forced labour in the course of their employment with VANEE FARM CENTRE INC.

Remediation Measures

Our Supplier Code of Conduct requires our suppliers to adhere to high standards of ethical conduct. Forced and child labour is strictly prohibited. In the event that we identify forced labor or child labor in our operations or supply chains, we take immediate and decisive action to address the issue. This includes: Temporarily suspending or terminating relationships with suppliers, sub-suppliers, or contractors involved, implementing measures to prevent forced labor or child labor from happening again in the future, providing support to victims of forced labor or child labor and/or issuing formal apologies to those affected.

VANEE FARM CENTRE INC did not discover nor was made aware of any instances of forced labour or child labour in its operations and supply chains during 2023 and, consequently, no remediation measures were required.

Training

Every new employee of VANEE FARM CENTRE INC must complete mandatory training from the Human Resources department on our values and policies, including our Health and Safety Policy, and Code of Business Conduct and Ethics, and is informed of how to report wrongdoing under our Whistleblower Policy. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

OUR PROGRESS AND EFFECTIVENESS

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. As of 2023, no significant concerns or complaints have been identified.

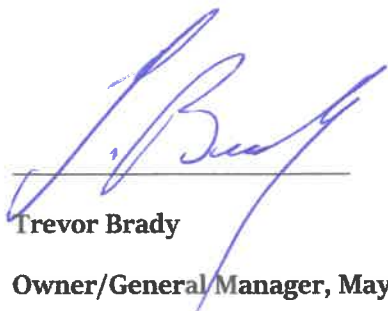
VANEE FARM CENTRE INC also evaluates the effectiveness of our policies through regular reviews and audits of our procedures related to forced labor and child labor. We will monitor key performance indicators, such as employee awareness and contract compliance with anti-forced labor and child labor clauses.

Based on our internal policies, practices and methods of assessment, VANEE FARM CENTRE INC considers its actions with respect to modern slavery in its operations and supply chain to be effective.

APPROVAL AND SIGNATURE

This Report was approved by VANEE FARM CENTRE INC's Board of Directors on May 29, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at www.vaneefarmcentre.ca.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Trevor Brady

Owner/General Manager, May 29, 2024

I have the authority to bind VANEE FARM CENTRE INC.

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