



FORCED LABOUR IN CANADIAN SUPPLY CHAINS REPORT - 2023

Reporting Company: **Vibrant Health Products Inc.**

Reporting Period: **January – December 2023**

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Introduction

Vibrant Health Products Inc. is a leading supplier and manufacturer of bread and related baked products in Canada and the USA. We are committed to upholding the highest ethical standards and corporate responsibility. We are guided by our core values in our operations which includes our dedication to respecting labor laws, upholding human dignity and rights, and developing a workplace culture that is based on integrity and fairness.

The following report summarizes the initiatives that were taken from January to December to address the issue of forced labor and child labor within our supply chains. We are in the early stages in our efforts during this period to develop a comprehensive measure that will address prevention, detection, and remediation.

Business Structure & Supply Chain

Vibrant Health Products Inc. is incorporated in Canada and has manufacturing facilities located in Abbotsford, BC. The company manufactures baked products that are wheat based and gluten-free such as breads, bagels, buns, tortillas, and pizza crusts. More than 250 workers are employed throughout our operations.

Vibrant Health Products Inc. is a family-owned entity, and operations are managed by senior company leaders that form the Executive Leadership Team (ELT) which is led by the president.

The company produces goods in Canada and engages co-manufacturers in its activities. Vibrant Health Products Inc. supplies products direct to the market as well as utilizing distributors. Goods are sold in Canada and outside of Canada. Vibrant Health Products Inc. does not control any of the entities that produce goods for its brands.

The company's products are sold in North America while our supply chain, where our raw materials and ingredients are sourced, extends to local and international suppliers in many countries.

Vibrant Health Products Inc. has been able to map the sources of goods it procures for use in its business as one of the preliminary steps taken to assess the risks of forced labour or child labour within the supply chain. We are continuing to formalize this process through a new systems database that was engaged in 2023 and through which we continue to onboard all of our suppliers.

We have assessed our organization's activities by a review of our hiring practices and policies, and there is no risk of forced and/or child labour in our activities. Through our database platform, we have collected supplier responses on compliance with Slavery and Human Trafficking Laws and continue to do so as we onboard suppliers to this platform and address our supply chain.

Policies and Due Diligence Processes

Policy on Human Rights and Modern Slavery

Vibrant Health Products Inc. (dba Silver Hills) is committed to operating in accordance with the highest ethical standards and all applicable laws, rules, and regulations. We place the highest value on the integrity of each employee and company representative. Our company expects compliance with all applicable laws, rules, and regulations, but also responsible and ethical behaviors and compliance with our Code of Conduct which is set out in the company's Policy Manual. The company believes in and upholds the dignity of each person, and all forms of modern slavery including forced labour and child labour are incompatible with our values. We are moving in the direction of developing a comprehensive framework in our business model to uphold and protect human rights, particularly in our supply chain, and are in the early stages of this development.

Our commitments:

Adherence and respect to National Legal Standards: Vibrant Health Products Inc. is dedicated to upholding all applicable national laws and regulations related to human rights. This includes forced labour and child labour.

Code of Conduct: Respect and protecting human rights are fundamental to us. Our Code emphasizes the importance of upholding human rights standards in all aspects of our operations, from procurement to production and sales. Colleagues and Supply Chain are encouraged to uphold the dignity of each person when conducting business activities and making decisions, ensuring that our actions align with ethical principles.

Supply Chain Assessment: This is in development. Information is being collated before assessment is done. Our company has engaged the services of a third-party contractor/consultant to conduct this assessment. Any identified breaches of human rights, such as instances of forced labour and child labour within our area of influence, control, and knowledge, will be actioned and remediation measures will be taken.

Risk Assessment

The sourcing of ingredients from suppliers within the supply chain could pose potential risks of forced labour or child labour, especially if these suppliers operate in regions with lower labour standards or inadequate oversight. It is important for Vibrant Health Products Inc. to assess and manage these risks throughout its business operations and supply chains with the following steps.

1. **Supplier Due Diligence:** We will be implementing a supplier approval process to appropriately vet suppliers and ensure that they are compliant with all applicable labour laws and ethical practices.
2. **Supplier Code of Conduct:** We are establishing a clear supplier code of conduct that outlines supplier expectations regarding labour practices, including the prohibition of forced labour and child labour. Suppliers will be required to sign and adhere to this code as a condition of doing business with Vibrant Health Products Inc.
3. **Contractual Agreements:** We are developing clauses in supplier contracts that explicitly prohibit the use of forced labour or child labour and require suppliers to certify compliance with labour laws and regulations.
4. **Training and Awareness:** We are exploring training for employees and suppliers on the importance of ethical labour practices and the identification of forced labour or child labour indicators. Open communication and reporting of any suspicions or concerns will be encouraged.
5. **Supply Chain Transparency:** We will maintain transparency throughout the supply chain by regular monitoring, site visits, and reporting on labour practices. This will primarily be done through our third-party contracted service.
6. **Continuous Improvement:** We will regularly review and update policies, procedures, and practices to address emerging risks and evolving standards. We will conduct regular audits and assessments to identify areas for improvement and implement corrective actions as needed.

Actions to Reduce and Address Risks

During the review period, no remediating actions were taken. Assessments need to be completed first.

Training & Awareness

No training activities took place during the review period. We are actively exploring training and awareness tools for employees and suppliers.

Approval and 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 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 Act, for the reporting year listed above.

I have the authority to bind Vibrant Health Products Inc.



Stan Smith

President

Vibrant Health Products Inc.

Date: May 30, 2024