

WILD ROSE CO- OPERATIVE ASSOCIATION LTD.



Forced Labour in Canadian Supply Chains

Wild Rose Co-operative Association Ltd.

April, 2024



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Introduction

This report is Wild Rose Co-operative Association Ltd.'s (Wild Rose Co-op) response to comply with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act) for the financial year ending October 31, 2023. In this Statement, the terms 'the Co-op', 'we', 'us', and 'our' refer to Wild Rose Co-operative Association Ltd. The reporting entity covered by this statement is Wild Rose Co-operative Association Ltd, business 100752450.

For the purposes of the Act, Wild Rose Co-operative Association Ltd meets the entity definition by having a business in Canada, doing business in Canada and meeting all three threshold criteria for revenue, assets and employees. Wild Rose Co-operative Association Ltd. is incorporated provincially and is obligated to submit a report to the Minister of Public Safety and provide a public report in response to the Supply Chains Act by May 31, 2024.

Wild Rose Co-op is committed to continuous improvement in the areas of identification and remediation of forced and child labour in operations as well as local and global supply chains. Further, Wild Rose Co-op is committed to respecting all human rights, in accordance with applicable law and the principles set forth in international standards, including the UN's Declaration of Human Rights, the UN Rights of Indigenous Peoples and UN Guiding Principles on Business and Human Rights.

Guided by core values of Teamwork, Excellence, People, Community

Wild Rose Co-op is committed to making ethical business decisions and taking proactive measures to address issues such as forced and child labour.

1. Structure, Activities, and Supply Chain Structure

Wild Rose Co-op is a Co-operative registered in the province of Alberta under the Alberta Cooperatives Act. Corporate Access Number 2213283555.

We are a member owned Co-operative. Organization Structure is as follows:



various immaterial items.

Supply Chain

Wild Rose Co-op's supply chain is comprised of products that are manufactured by FCL legally owned entities and products sourced for resale.

Wholesale and Retail Trade: Products Sourced for Resale

CATEGORY	DESCRIPTION
AGRICULTURE	Agricultural equipment, crop protection products, bulk fertilizer, and livestock feed.
ENERGY	Fuel, lubricants, propane
FOOD	Food store items including fresh meat, fresh produce, frozen bakery dough products, fresh baked goods, grocery items, convenience store items, liquor and candy.
HOME AND FARM SUPPLIES	Fencing supplies, paint, household goods, pumps, power tools.

2. Policies and Processes in Relation to Forced and Child Labour

Internal

Wild Rose Co-op maintains Compliance and Ethics policies to which all employees must adhere to through an annual Code of Conduct attestation. Wild Rose Co-op has an established internal process for anonymous reporting of actual or potential wrongdoing including any actual or potential violation of law, regulation, policy and procedure. Procedures are put in place to protect the anonymity of whistle-blowers from retaliation. Wild Rose Co-op's People and Culture team regularly reviews human resource related policies to ensure Wild Rose Co-op remains in compliance with applicable workplace and labour legislation.

Wild Rose Co-op ensures that there is reduced risk of forced or child labour in operations through strict adherence to provincial and federal labour laws. As per Alberta's labour laws, Wild Rose Co-op does not employ anyone under the age of, and follows all applicable young worker restrictions for employees under the age of 15. We follow all provincial legislation and



employment standards for all employees.

Wild Rose Co-op is exploring the implementation of effective grievance and remediation mechanisms in effort to address concerns or potential cases of forced and child labour in the supply chain. Wild Rose Co-op's goal is to prioritize the reporting and remediation of forced and child labour incidents, protect victims and prevent future cases. Potential mechanisms may include:

- Development of a remediation framework with information on when to safeguard the victim, develop and implement a corrective action plan with the employer, alert national authorities and consult a third-party expert organization;
- Implementation of a software solution to audit suppliers; or
- Develop a grievance mechanism that suppliers' employees can access anonymously in a format that is inclusive and accessible.

3. Identification of Risks

Wild Rose Co-op's main supplier, FCL, accounts for 98% of total procured goods. In assessing the risk of forced labour or child labour at the direct supplier level for this relationship, FCL has concluded on the following assessment of the use of child labour and/or forced labour within their supply chain, using two separate indices - *Walk Free's Global Slavery Index* and *the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor*:

1. Goods procured within the food categories of 1) protein foods (specifically seafood); 2) beverages (specifically coffee); and 3) other (specifically chocolate):
 - a. An inherent risk of child and forced labour has been identified within the above categories. FCL has a sustainable seafood policy and, sustainably sources fair-trade-certified products to mitigate these risks.
2. Goods procured for home building centres:
 - a. Key suppliers of FCL's home building centres import from China, which has been identified as a country with a high inherent risk of forced and child labour. To mitigate this risk, FCL requires key suppliers to sign a Social Responsibility Agreement. The agreement requires suppliers to ensure they are supporting commitments to responsible sourcing and provide workers with fair wages and working hours, as well as a safe, clean, and healthy work environment.

FCL is exploring opportunities to understand and reduce the risk of forced and child labour within their supply chain therefore, Wild Rose Co-op will be relying on this on-going assessment to continue assessing goods procured from FCL.



Wild Rose Co-op's supply chain mapping activities on were limited to our most material vendors. Materiality was determined by selecting our top 98% of suppliers by total spend in 2023. 98% of our purchases are made through Federated Co-operatives Ltd. The remaining 2% of first line suppliers are located in Canada.

4. Remediation of Forced and Child Labour

Wild Rose Co-op has taken action to remediate potential risks of forced and child labour through deployment of the policies and procedures outlined in Section 2 of the report. In the future, Wild Rose Co-op will explore opportunities to increase auditing and monitoring of suppliers to reduce the risk of forced and child labour. If specific incidents of forced and child labour are identified, Wild Rose Co-op will work with suppliers to determine and implement remedial action.

5. Remediation of Loss of Income

Wild Rose Co-op has not identified any child or forced labour in operations or supply chains, and therefore no measures have been taken to remediate the loss of income to vulnerable families that results from any measures taken.

6. Employee Training

Annual training and attestation are currently required for all employees to ensure compliance with Wild Rose Co-op's Code of Conduct on company ethical standards, policies, laws and regulations. The Code of Conduct is applicable to everyone that conducts business on behalf of the organization which includes the Wild Rose Co-op Board of Directors, the Senior Leadership Team and all current and new employees and contractors. Wild Rose Co-op has identified the opportunity to incorporate human rights awareness training into the annual Code of Conduct attestation to create awareness and the associated risks of forced and child labour. In addition, Wild Rose Co-op is exploring opportunities to provide role specific training to educate team members and help them identify and respond to risks of child and forced labour in supply chains. These opportunities will be evaluated through fiscal year 2024.

7. Efficacy of Actions

Wild Rose Co-op has conducted a review of current policies and procedures as they pertain to child and forced labour and is currently evaluating further measures to assess the efficacy of actions. Success will be evaluated by tracking relevant performance indicators, such as levels of employee awareness, number of vendors signing the Social Responsibility Agreement, number of employees in procurement roles participating in training, as well as an annual review of the policies and procedures in place related to forced and child labour.



8. Approval and Attestation of the Report

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.

Carol Rollheiser
General Manager
April 22, 2024

**Approved by the Wild Rose Co-operative Association Ltd. Board of Directors
April 22, 2024**

I have the authority to bind Wild Rose Co-operative Association Ltd. The Statement has been reviewed and approved by the Board on behalf of itself.