

**\*\*2024 Annual Report**

Fighting Against Forced Labour and Child Labour in Supply Chains Act  
(Browne Group Inc.)\*\*

**Part 1: Submission Information**

**Legal name of reporting entity:**

**Browne Group Inc.**

**Reporting year:**

May 31, 2025

**Financial year covered by this report:**

January 1, 2024 – December 31, 2024

**Is this a revised report?**

No

**Business Number:**

817369580RM0001

**Is this a joint report?**

No

**Is the entity subject to reporting requirements in another jurisdiction?**

No

**Entity characteristics (select all that apply):**

- Has a place of business in Canada
- Does business in Canada
- Has assets in Canada
- Meets size-related thresholds
  - At least \$20 million in assets in one of the two most recent financial years
  - At least \$40 million in revenue in one of the two most recent financial years

**Industry sectors:**

- Wholesale trade (foodservice products serving hotels, restaurants industry and household goods merchant wholesalers)
- Retail trade (General merchandise retailers)

- Transportation and warehousing (Warehousing and storage)

**Head office location:**

Canada — Ontario

**Entity structure:**

Corporation

**Primary activities:**

Importing goods into Canada

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## **Part 2: Annual Report**

### **1. Structure, Activities, and Supply Chains**

Browne Group Inc. is a Canadian corporation engaged in wholesale distribution, foodservice and retail merchandising, and warehousing of foodservice products serving hotels, restaurants industry and household consumer products. The company imports finished goods and components from various international suppliers for distribution across Canada through retail partners, wholesale channels, and direct distribution centers.

Our supply chain is composed primarily of Tier 1 suppliers who manufacture or assemble goods abroad. These suppliers source raw materials and components from upstream vendors. The company engages third-party logistics providers for transportation, freight forwarding, and warehousing services. Browne Group Inc. maintains long-term supplier relationships in regions with varying degrees of labour-related regulatory maturity, which may present potential forced or child labour risks.

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### **2. Steps Taken to Prevent and Reduce Forced Labour and Child Labour Risks**

During the 2024 financial year, Browne Group Inc. initiated improvements to its approach to supply-chain risk management, including:

- **Action Plan Development:** Began designing an internal action plan to formalize how forced labour and child labour risks are monitored and mitigated within our international supply chain.
- **Supplier Requirements:** Communicated expectations to key suppliers regarding ethical labour practices and began aligning procurement language with standards prohibiting forced and child labour.

- **Supplier Monitoring:** Conducted informal monitoring through supplier conversations, documentation reviews, and follow-ups regarding labour management practices.
- **Supplier Audits:** Initiated selected third-party audits with certain higher-volume suppliers to verify compliance with basic labour standards.

These activities form Part 1 of Browne Group Inc.'s longer-term strategy to increase supply-chain transparency and develop a more structured due diligence program.

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### 3. Policies and Due Diligence Processes

At the time of this reporting year, Browne Group Inc. does not yet have formal, standalone forced labour or child labour policies in place. Recognizing this gap, the company has begun developing preliminary due diligence processes, including:

- Evaluating third-party policy templates and industry best practices
- Reviewing contract language to incorporate ethical sourcing requirements
- Establishing internal discussions aimed at developing a compliance framework

The company expects to implement a formal due diligence policy and supplier code of conduct in the upcoming reporting period.

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### 4. Identified Risks and Actions Taken to Assess and Manage Risks

Although Browne Group Inc. has **not identified confirmed cases** of forced or child labour in its activities or supply chain, we recognize that some international sourcing regions inherently carry a higher risk. Based on preliminary assessments, we have identified risks related to:

- Limited visibility into Tier 2 and Tier 3 suppliers
- Geographic sourcing from jurisdictions with known governance or enforcement challenges
- Manufacturing sectors where vulnerable populations may be employed

**Actions taken to assess and manage these risks include:**

- Reviewing supplier-provided documentation related to labour practices
- Conducting limited third-party audits
- Communicating heightened expectations to suppliers in higher-risk regions

- Beginning to map supply chain tiers for improved transparency

The company will continue to expand its risk-assessment process in future reporting years.

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## **5. Measures to Remediate Forced Labour or Child Labour**

Browne Group Inc. did not identify any confirmed cases of forced labour or child labour during the reporting period. As a result, no remediation measures were required.

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## **6. Measures to Remediate Loss of Income for Vulnerable Individuals and Families**

Because no incidents requiring corrective labour interventions were identified, Browne Group Inc. did not implement income-restoration measures involving vulnerable individuals or families.

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## **7. Training Provided to Employees**

Browne Group Inc. did not provide formal employee training on forced labour or child labour during the reporting period.

However, the company is in the process of designing a training program as part of its action plan, which will be rolled out to relevant employees—including procurement, logistics, and vendor-management teams—during future reporting cycles.

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## **8. Assessing Effectiveness**

Browne Group Inc. does not yet have a defined process for measuring the effectiveness of its forced labour and child labour risk-prevention efforts.

For future reporting periods, the company expects to track:

- Supplier audit outcomes
- Non-compliance findings
- Supplier remediation progress
- Employee training completion
- Improvements in supply-chain visibility

These indicators will form the basis of an effectiveness-assessment framework currently under development.

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**Attestation**

In accordance with section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, I attest that I have reviewed the information contained in this report on behalf of the governing body of Browne Group Inc. 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 indicated.

**Full Name:** Michael Farrell

**Title:** Vice President of Operations

**Date:** February 17, 2026