



JD Sweid Foods (2013) Ltd.

(“JD Sweid Foods”)

**Report Pursuant to the
Fighting Against Forced Labour and Child
Labour in Supply Chains Act
Fiscal 2024 (Jul’23-Jun’24)**

May 27, 2025

FORCED LABOUR AND CHILD LABOUR STATEMENT, F2024

Modern slavery exists in various parts of the world, affecting millions of men, women, and children. It is a grave violation of human rights and a complex issue that requires coordinated efforts from governments, law enforcement agencies, civil society organizations, and communities to address effectively. As Canada confronts the scourge of modern slavery, it must remain steadfast in its commitment to upholding human dignity and fundamental rights for all. By raising awareness, fostering collaboration, and prioritizing the needs of victims, society can work towards a future where every individual is free from exploitation and oppression. This includes taking action in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”).

At JD Sweid Foods (2013) Ltd., we acknowledge our responsibility in contributing to the eradication of modern slavery. Human rights are fundamental at JD Sweid Foods. Our actions are driven by our values. We are committed to respecting the human rights of all whose lives and livelihoods we touch. JD Sweid Foods complies with local laws and respects federally recognized human rights throughout our own operations, supply chains, and the communities where we do business. We take guidance from Canadian standards and declarations, including those related to human rights and labour standards, and we are committed to promoting and upholding these principles in all that we do.

Our approach is guided by our core values: **teamwork, integrity, performance-driven, and solution-oriented**. These values define how we treat each other, how we do business, and how we engage with the world around us.

JD Sweid Foods believes in the fair treatment and lawful remuneration of employees. We are committed to operating in accordance with the highest ethical standards, as outlined in our Code of Business Conduct and Ethics and in compliance with employment and all applicable laws, rules, and regulations. We are dedicated to fostering a diverse, inclusive, and respectful workplace, free from any form of harassment, violence, or discrimination, including forced and child labour.

We have established compensation and remuneration systems aligned with provincial legislation and have defined clear expectations for how our management team should lead, engage with employees, and uphold legal and ethical obligations.

In addition, JD Sweid Foods seeks to do business with suppliers, vendors, and contractors that share our values and demonstrate ethical, transparent, and sustainable business practices. We expect these organizations to have fair, lawful, and safe workplace practices where individuals are treated with dignity and respect and are paid in accordance with the law.

This Modern Slavery Statement outlines the actions and activities undertaken by JD Sweid Foods (2013) Ltd. during the financial year July 2, 2023 – June 29, 2024. It has been prepared in accordance with and meets the mandatory reporting requirements of the Modern Slavery Act.



David Pickrell

President

JD Sweid Foods (2013) Ltd.

CONTENT:

1. Identification of the reporting entity
2. JD Sweid Foods reporting structure, operations and supply chains
3. Description of modern slavery risks in JD Sweid Foods operations and supply chains
4. Description of actions taken by JD Sweid Foods, Governance and Due Diligence
5. Effectiveness of these actions
6. Consultation process
7. Other relevant information

1. IDENTIFICATION OF THE REPORTING ENTITY

This statement outlines the responsibilities and commitments of JD Sweid Foods (2013) Ltd. in addressing the risks of modern slavery, including forced labour and child labour. It affirms the company's commitment to implementing and maintaining policies and procedures designed to identify, prevent, and eliminate such practices across its operations and supply chain.

As a mid-sized Canadian further food processor, JD Sweid Foods plays a critical role in promoting human rights and upholding ethical business practices. The company acknowledges the potential risks associated with forced and child labour and is committed to proactively addressing and mitigating these risks throughout its business activities.

JD Sweid Foods is subject to the legal obligations outlined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") and issues this Report in accordance with Section 11 of the Act. This Report outlines the actions taken by JD Sweid Foods during its Fiscal 2024 financial year (July 2, 2023 – June 29, 2024) to prevent and reduce the risk of forced labour or child labour being used at any stage of its operations or within its supply chain.

2. JD SWEID FOODS'S REPORTING STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Structure

JD Sweid Foods (2013) Ltd. is a privately owned company and a leading Canadian manufacturer of further processed poultry, beef, and pork products, operating from two production facilities across the country. Our products are distributed nationwide in both the foodservice and retail markets.

JD Sweid Foods sources the majority of its goods and services from Canadian suppliers. Key procurement categories include poultry, beef, pork, packaging, ingredients, and consumables.

With over 350 full-time employees, JD Sweid Foods plays a vital role in supplying fully cooked and par-fried poultry products to Canada's retail and foodservice sectors. As one of the key poultry further Canadian processors, our approach to food safety and quality is built on a philosophy that goes far beyond the products we manufacture, we are committed to integrating safety and quality into every aspect of our operations.

Operations and supply chains

JD Sweid Foods sources its goods and services from suppliers which predominately consists of:

- Protein supply (butchered poultry, beef and pork)
- Packaging
- Dry and other ingredients, and consumables
- Industrial and plant services (e.g. maintenance and repair, garbage disposal, sanitation, etc.)
- Corporate services (e.g. telecommunication, travel)

At JD Sweid Foods, we source all raw materials exclusively from reputable, licensed producers to ensure our products meet the highest standards of quality and safety. While the majority of our suppliers are located within Canada, a small portion of goods is sourced internationally to support specific product requirements.

The JD Sweid Foods website at <https://jdsweid.com/> will provide you with a greater understanding of the business, our products and people and the areas we operate and customers we supply.

Predominately our operation consists of **Further Processing and Distribution**.

JD Sweid Foods has two further meat processing plants located in Langley, British Columbia, and Waterloo, Ontario, and produces primarily poultry products, but also beef and pork products.

3. DESCRIPTION OF MODERN SLAVERY RISKS IN JD SWEID FOODS'S OPERATIONS AND SUPPLY CHAINS

Operations

Given these practices and the geographic distribution of our suppliers, JD Sweid Foods supply base is assessed to be at low risk for the exploitation of forced and/or child labour.

The vast majority of employees employed by JD Sweid Foods are employed directly. JD Sweid Foods employees are treated fairly, equitably and remunerated in line with the corresponding federal and provincial legislation. JD Sweid Foods fair compensation awards cover key areas including wages, hours of work, overtime conditions, additional remuneration, and leave entitlements. For more senior positions, they are engaged under the terms of a common law contract, which is well above the minimum conditions. All employees remain subject to at least the minimum conditions in the corresponding provincial Employment Standards Act, which is regularly reviewed. These conditions are supported by a range of policies and procedures providing additional benefits. JD Sweid Foods's employment practices comply with the human rights, applicable federal and provincial laws within Canada.

JD Sweid Foods maintains a comprehensive Code of Conduct and a suite of Corporate Policies that reflect our commitment to ethical business practices and full compliance with applicable laws and regulations. These policies apply to all employees, managers, directors, suppliers, and agents, and clearly outline our zero-tolerance to unethical conduct in any form.

Key elements of our policies include:

- **Commitment to Human Rights Legislation:** JD Sweid Foods is dedicated to upholding human rights and ensuring working conditions that promote dignity, fairness, and respect. We reject all forms of forced or child labour and operate in full compliance with relevant human rights legislation.
- **Monitoring and Compliance Oversight:** Our HR department is responsible for ensuring adherence to these policies. Regular reviews and updates are conducted to evaluate policy effectiveness and ensure they remain current and impactful.
- **Reporting and Whistleblower Protection:** We encourage employees to raise concerns or report any suspected violations to management or the Human Resources department. All reports are taken seriously, and retaliation against individuals who speak up in good faith is strictly prohibited.

Our recruitment processes are strongly supported by JD Sweid Foods's policies and procedures. Employment decisions are made on the principle of merit, with no instances of forced labour. All employees are required to demonstrate their legal right to work in Canada and proof of age. For those employees who hold authorized work permits, JD Sweid Foods regularly checks to ensure that an employee's work permit is still valid and any other limitations that may be placed on their work permit.

Supply Chains

JD Sweid Foods sources its products and services predominately from within Canada with minimal products coming from overseas.

JD Sweid Foods maintains a high ethical standard across its operations. It's our policy to ensure that the ethical standards that apply within our own business are also adhered to in our supply chain. The identification of risk within our supply chain is a key initial step in understanding what's required and prioritising actions.

While JD Sweid Foods predominately sources goods and services from within Canada, there are most likely inherent risks further down the supply chain. There may be situations where services or products supplied to JD Sweid Foods by an organisation doesn't breach any modern slavery requirements, however if the organisation sourcing the products is getting them from overseas, this could be identified as a potential risk. An example could be the purchase of electronic equipment. JD Sweid Foods may be purchasing from a reputable supplier within Canada, however the item or components may be manufactured and produced overseas where modern slavery practices may be breached.

At JD Sweid Foods, we operate a Supplier Approval Program that includes a Food Fraud Vulnerability Self-Assessment as well as a Food Defense and Food Fraud Plan. While these tools are primarily focused on food protection and are used to mitigate risks related to food fraud and tampering, as of May 2024, we have incorporated additional questions to ensure our supply chain aligns with the principles of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. This information is monitored by the Senior Leadership Team within the supplier's approval and validation process.

All suppliers and service providers are now required to provide feedback regarding their compliance with human rights, as well as applicable federal and provincial legislation. This includes confirming whether they have a policy in place that explicitly prohibits the use of forced labour or child labour within their operations and supply chains.

4. DESCRIPTION OF ACTIONS TAKEN BY JD SWEID FOODS, GOVERNANCE AND DUE DILIGENCE

In the last fiscal year (Jul'23 – Jun'24), JD Sweid Foods did not identify any confirmed instances of modern slavery risk within its supply chain. However, some opportunities were found:

Risk	Issue	Action
Based on an analysis of actual procurement activities, a potential area of risk was identified in the supply of certain dry spice ingredients. These products are imported by a Canadian supplier but are sourced from countries where local legislation and employment practices may differ significantly from Canadian standards. This variation may present potential vulnerabilities related to forced labour or child labour.	<p>Possible risks may be:</p> <ul style="list-style-type: none"> • Use of forced labour or child labour in growing, harvesting, or manufacturing. • Payment of wages below legal minimum standards. • Unsafe or hazardous working conditions. 	JD Sweid Foods has developed and distributed Vendor Requirement and Code of Conduct statement, which establishes the expectations from our suppliers and vendors in relation to ethical business standards, including vendor's adherence with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. JD Sweid Foods has not identified any misconduct and will continue monitoring procedure and engaging

<p>As a result of the labour supplier analysis initiated by JD Sweid Foods during the F2024 fiscal year, potential areas of risk were identified, particularly in relation to providers engaging foreign workers.</p>	<p>Potential risks related to labour suppliers may include:</p> <ul style="list-style-type: none"> • Use of forced labour in recruitment or employment practices. • Payment of wages below the provincial minimum standards. • Providing the personnel unauthorized to work in Canada. <p>Since the provided labour operates on-site at JD Sweid Foods facilities, health and safety conditions are directly monitored by JD Sweid Foods supervisors to ensure compliance with company standards and regulatory requirements.</p>	<p>with suppliers to ensure due diligence measures are in place.</p> <p>The primary actions related to the evaluation and assessment of this category of suppliers are scheduled for the F2025 fiscal year (ending July 2025) and will be reported accordingly.</p>
<p>Verification of JD Sweid Foods workers' identity and legal right to work in Canada prior to employment.</p>	<p>Potential risk of child labour or unauthorized employment within operations.</p>	<p>JD Sweid Foods has implemented a secure online verification tool that allows to validate workers' identity, age, and, where applicable, work permits and immigration documentation during the onboarding process and prior to employment. This ensures full compliance with legal requirements before the employment relationship begins.</p>
<p>Low awareness of personnel regarding modern slavery, forced labour, and related compliance requirements.</p>	<p>Insufficient understanding of the risks and indicators of modern slavery may lead to missed red flags, delayed reporting, or non-compliance with company policies and legal obligations.</p>	<p>JD Sweid Foods has developed a dedicated section within the onboarding training to raise awareness among new employees and enhance their understanding of modern slavery risks, including guidance on how to recognize and report potential concerns.</p>
<p>Lack of opportunities for external suppliers and their workforce to report concerns related to modern slavery, forced labour, or related issues.</p>	<p>While internal communication channels and senior management contact information are accessible to all JD Sweid Foods employees, external suppliers and their</p>	<p>JD Sweid Foods has implemented an online reporting channel, available on the Compliance page of the corporate website. This platform enables external parties, including suppliers, contractors,</p>

	workers may not have a direct mean of raising concerns, which could limit JD Sweid Foods’ visibility into issues within its supply chain.	and their workforce, to raise concerns or submit complaints related to potential non-compliance with the <i>Fighting Against Forced Labour and Child Labour in Supply Chains Act</i> or other applicable standards and regulations. This tool enhances transparency and supports proactive supply chain oversight.
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Operations

JD Sweid Foods seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. JD Sweid Foods expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

JD Sweid Foods has certain policies in place to help ensure that modern slavery does not occur within its operations or business practices. Key examples include:

- **Recruitment Policy and Procedures:** All recruitment and selection processes reflect JD Sweid Foods’ commitment to equal opportunity. Candidates are assessed solely on their skills, knowledge, qualifications, and capabilities. The company is dedicated to offering challenging, meaningful, and rewarding opportunities for personal and professional growth, without regard to race, colour, ancestry, place of origin, political belief, religion, marital or family status, physical or mental disability, sex, sexual orientation, age, or any other legally protected status.
- **Health & Safety Policy and Procedures:** All employees receive comprehensive orientation training to understand the hazards and risks they may encounter during their employment. This includes annual refresher training, monthly safety toolbox talks, and special safety presentations to continuously support the health, safety, and wellbeing of all employees.
- **Harassment and Violence Policy:** JD Sweid Foods is an equal opportunity employer committed to maintaining a workplace free from harassment, bullying, retaliation, and discrimination. All individuals are treated with dignity, courtesy, respect, and fairness based on individual merit.

These policies are regularly reviewed by senior management to ensure compliance with evolving legislative standards and alignment with JD Sweid Foods’ commitment to ethical and responsible business practices.

5. EFFECTIVENESS OF THESE ACTIONS

Our policies define the standards of behaviour expected of all associated with JD Sweid Foods, including suppliers. These policies set out JD Sweid Foods’ expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

At the time of this Report, JD Sweid Foods has not reported or identified instances of forced labour or child labour in our activities and supply chains, nor have we identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

6. CONSULTATION PROCESS

JD Sweid Foods has involved its key management teams – Operations, Procurement, Quality Assurance and Human Resources, in order to prepare and complete this Report.

7. OTHER RELEVANT INFORMATION

While JD Sweid Foods is confident that, we meet the requirements of modern slavery and human rights legislation in our immediate business operations, we recognize that continued efforts are needed across our broader supply chain. Key areas of focus include:

- Ongoing enhancement of employee education and awareness to ensure all personnel understand JD Sweid Foods’ commitment to social responsibility and know how to raise concerns appropriately.
- Continued monitoring and strengthening of our Supplier Approval Program to verify that all suppliers consistently meet our ethical and business conduct expectations.
- Implementation of a formal Supply Chain Code of Conduct that reflects the evolving requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.
- Introduction of an assessment and compliance validation tool for labour suppliers, ensuring alignment with the Act and other applicable standards and regulations.

By focusing on these areas, JD Sweid Foods aims to maintain a high level of confidence that the suppliers we engage with are in full compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and uphold the same standards of integrity and accountability we apply within our own operations.

JD Sweid Foods stands firm in our commitment to advancing human rights, acting with integrity, behaving responsibly and treating people with respect in all areas of our operations and within our supply chain. We will continue to collaborate with our partners, customers and suppliers to enforce a broader due diligence framework and protection against any forced or child labour.