

## MODERN SLAVERY REPORT YE 2025



This Modern Slavery Report (the "Report") addresses the period from February 1, 2024 to January 31, 2025 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 **Foster's Seed and Feed Ltd.** ("Foster's").

## I. INTRODUCTION

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As the largest privately owned supplier & processor of Creeping Red Fescue in Western Canada, Foster's 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 2025 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 Foster's or of goods imported into Canada by Foster's.

## II. OUR BUSINESS

Foster's service area consists of the entire Peace Region throughout Alberta and British Columbia. We are situated to serve you from our key locations in Beaverlodge, Grande Prairie, and Fort St. John. Located in the Beaverlodge valley, our Seed Farm produces pedigree and common seeds. The vast quantities of seed we produce are sold through our Foster's Seed and Feed locations. Our main crops include oats, wheat, barley, canola, creeping red fescue, perennial ryegrass, peas, and faba beans. Foster's Seed & Feed is the largest privately-owned buyer and processor of creeping red fescue in Western Canada. With our cleaning plant, we can process 80,000 pounds of fescue a day. We buy fescue from local farmers, clean it, and ship it within Canada and internationally. We also process timothy, perennial ryegrass, brome grass, clovers, and other hard seeds.

Foster's supply chain includes farmers and businesses that supply seed from farmers and businesses to process and sell. We also provide customers products to enhance farmer operations. Most of our direct suppliers are North American-based agriculture seed manufacturers and distributors who are based in Western Canada and the United States.

In total, we procure goods and services from approximately 300 suppliers and contractors. Further information about our business can be found on our website at [www.fosterscanada.com](http://www.fosterscanada.com)

## III. OUR POLICIES

### **Policies**

Through our business code of conduct and procurement 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**

Foster'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 also expect our suppliers to share in our commitment to respect human rights and strive to meet the highest ethical business standards and international best practices for responsible business conduct. Our Supplier Code of Conduct sets forth our commitment to preventing and eliminating forced and child labour, and our expectation that suppliers engage in due diligence to identify, address, and resolve risks and instances of forced or child labour in their own operations. We engage with suppliers that are committed to principles of diversity and inclusivity in their supply chains and ask that suppliers commit to these standards as a condition of doing business with us. We aim to review our Supplier Code of Conduct on a periodic basis to ensure that this policy is in line with current best practices.

### **Code of Business Conduct and Ethics**

We are committed to conducting our business in a lawful and ethical manner. Our Business Code of Conduct (the Code) is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Foster's employees should always act lawfully, ethically and in the best interests of Foster's.

### **Whistle Blower Policy**

As outlined in our Personnel Policy Manual, Foster's Conflict Resolution process encourages employees to bring grievances to their direct manager. If they feel the issue is not resolved, they are encouraged to then go to the COO of Foster's to discuss their problem openly without reprisal.

### **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 the following steps:

- Employees involved in Procurement are trained in the risk of forced/child labour to ensure they understand the basis of the risk and how to best assess the risk of our suppliers
- We acknowledge where we have control or visibility over our supply chain and where we do not. We work with our suppliers to ensure that they perform due diligence on their supply chains, especially in those areas that we do not have control.
- We perform due diligence analysis of our suppliers to the best of our ability to assess our risk of forced/child labour in our supply chain.

#### IV. ASSESSING OUR RISK

Foster's engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, we refer to external data sources, and engage with our peers. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Reliance on low skilled workforce
- Long, complex, or non-transparent supply chains
- Presence of child labour or imbalance of power on workforce
- Jurisdictional risks including poverty, conflict, and enforcement of international human rights standards

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as technology, raw material sourcing, and electrical components in particular. We recognize that our exposure of forced labour and/or child labour increases when we engage with suppliers who source goods or raw materials from countries where forced labour exploitation is known to occur. As such, we follow a risk-based approach to our due diligence activities. Our due diligence is prioritized to the most significant adverse impacts on the basis of severity and likelihood of harm, and focus our attention and resources.

#### V. OUR COMMITMENTS

##### Steps to Prevent and Reduce Risks of Forced and Child Labour

Examples of steps taken to prevent and reduce risks of forced and child labour include:

- Developing and implementing an action plan for addressing forced labour and/or child labour;
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
- Acknowledging practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour;
- Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists;
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour;
- Developing and implementing training and awareness materials on forced labour and/or child labour;
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour;
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour;

### **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. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labour and child labour is mitigated in our business.

In the event that we discover any forced labour or child labour in our business and supply chains, we take the following measures to remediate such forced labour or child labour:

- *Suspension or termination of a supplier, sub-supplier or contractor;*
- *Actions to prevent forced labour or child labour and associated harms from reoccurring;*
- *Grievance mechanisms;*
- *Capacity-building measures, enhanced supervision and/or monitoring of supplier, sub-supplier or contractor].*

### **Training**

Every year, Foster's personnel at all levels are required to complete a mandatory certification process to ensure that our Code of Business Conduct and Ethics is understood and properly applied to our daily activities. Every new employee of Foster's must complete mandatory online training on our values and policies, including our Code of Business Conduct and Ethics, and is informed of how to report wrongdoing under Conflict Resolution in our Personnel Policy Handbook. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

## **VI. 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 Conflict Resolution policy and other informal mechanisms of employee feedback. To date no significant concerns or complaints have been identified.

We also assess the effectiveness of our policies by:

- Tracking employee retention in each department.
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators.

**VII. APPROVAL AND SIGNATURE**

This Report was approved by Foster's Seed and Feed Ltd. Board of Directors on April 29th, 2025 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.fosterscanada.com](http://www.fosterscanada.com)

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 Foster's Seed and Feed Ltd. 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.

  
Jesse Foster (Apr. 30, 2025 15:24 EDT)

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**Jesse Foster**

**President, April 30, 2025**

I have the authority to bind Foster's