

**Report to confirm compliance with Bill S-211,
Fighting Against Forced Labour and Child
Labour in Supply Chains Act**

Friesens Corporation

May 12, 2025

Identifying information

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| Reporting entity's legal name | Friesens Corporation |
| Financial reporting year | January 1 – December 31, 2024 |
| Identification of a revised report | <i>not applicable</i> |
| Business number | 101527471 |
| Identification of a joint report | <i>not applicable</i> |
| Identification of reporting obligations in other jurisdictions | <i>none</i> |
| Entity categorization according to the Act | Corporation |
| Sector/industry | Manufacturing |
| Location | Altona, Manitoba, Canada |

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 this report. 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.

Full name Chad Friesen
Title CEO, Friesens Corporation
Date May 12, 2025

I have the authority to bind Friesens Corporation.

Signature 

Note:
This report received approval from the Board of Directors of Friesens Corporation in May 2025.

Note:

This report references activities undertaken during Friesens Corporation's previous financial year (January 1 – December 31, 2024).

1. Friesens Corporation's structure, activities, and supply chains

- a. Friesens Corporation is a corporation registered in the Province of Manitoba.
- b. Friesens Corporation is an employee-owned, for-profit company. Profits are distributed to all active employees on a regular basis (at least once annually).
- c. The organizational structure consists of divisions and departments, with department managers reporting to divisional leaders, who report to corporate managers (vice-presidents) or the CEO. There is a standard chain-of-command structure.
- d. The organizational vision is to help others share their best story with the world, through printed books, school yearbooks, and self-publishing services.
- e. The number of employees, including employees located in Canada and outside Canada, is approximately 550.

- f. Friesens Corporation manufactures printed books in Canada and sells those books in Canada and outside Canada.
- g. Friesens Corporation manufactures books in two (2) facilities only, both of which are located in Altona, Manitoba.
- h. Friesens Corporation purchases raw materials from domestic and international companies, including paper, cover material, board, printing plates, ink, laminating film, glue, and corrugated cartons.
- i. Paper is the largest-volume raw material used in manufacturing books. We purchase paper that is produced by paper mills operating in Canada, the USA, and Italy.

- j. Friesens Corporation's supply chains include suppliers and manufacturers that are located in several countries. A very large majority of our raw material and equipment supplies are manufactured in Canada and the USA. We have fewer than 10 suppliers who manufacture in European countries (The Netherlands, Italy, Belgium, and Germany), and even fewer (less than 5) suppliers located in other countries (Israel, India, and South Korea).

2. The steps Friesens Corporation has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Friesens Corporation or of goods imported into Canada by Friesens Corporation

- a. Friesens Corporation, its officers and managers, and its Human Resources staff consistently applied care and due diligence in complying with all labour laws and employment standards of the Province of Manitoba, including the *Employment Standards Code* which specifies minimum wage standards, protection for young workers, and the payment of wages.
- b. Friesens Corporation also applied due diligence and fully complied with the *Worker Recruitment and Protection Act* of Manitoba, which was enacted specifically to improve protections for foreign workers.
- c. In February 2024, a SMETA Pillar 2 Social audit was conducted by Intertek, which included an audit of Friesens Corporation's policies and practice in the areas of Management Systems, Working Hours, Wages & Benefits, and Labour Practices (including Forced Labour). The evidence examined included a review of company policies, employee interviews, and personnel files. There were no instances of non-compliance with the SMETA Pillar 2 standards.
- d. In March 2024, Friesens Corporation was audited by Preferred by Nature (NEPCon Canada) to confirm compliance to the FSC-STD-40-004 v3-1 standard who included (as part of their audit process) an assessment of Friesens Corporation's adherence to provincial and/or Canadian labour laws and Corporation's practice of preventing and reducing the risk that forced labour or child labour.

The audit by Preferred by Nature (NEPCon Canada) in March 2024, which included demonstration of Friesens Corporation's compliance with the Forest Stewardship Council core labour requirements which specifically includes affirmations pertaining to forced labour and child labour, resulted in confirmation of Friesens Corporation FSC certification status. Based on auditor's recommendation and Preferred by Nature quality review, the FSC certification was approved. Certificate code: NC-COC-001271.

- e. Friesens Corporation holds correspondence, provided by our primary ink supplier, that indicates that they require their suppliers to certify that no raw materials supplied are produced by means of slavery or human trafficking.
- f. Friesens Corporation holds correspondence, provided by our primary printing plate supplier, that indicates that they require their suppliers to affirm that no raw materials supplied are produced by means of slavery or human trafficking.
- g. Friesens Corporation holds correspondence, provided by our supplier of digital printing equipment and related supplies, that indicates that they require their suppliers comply with international standard and regulations pertaining to forced labour or child labour.

3. Friesens Corporation's policies and due diligence processes in relation to forced labour and child labour

- a. Friesens Corporation has a published employee handbook ("The Friesens Way") that is made available to all employees. This handbook incorporates statements, policies and expectations for managers and employees encompassing the company's values and adherence to employment standards, including compliance and due diligence to ensure compliance with standards and regulations pertaining to forced labour or child labour. This handbook represents Friesens Corporation's documented policy and position and is our method of embedding responsible business conduct (RBC) into our operations and management systems. Representations of our statements, policies and expectations include:

We believe that every employee is entitled to work free of both harassment and violence. Friesens is committed to building and preserving a safe, productive, and healthy working environment for all employees based on mutual respect.

All employees must protect our company's legality. They are expected to comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with each other, Friesens property, our company's finances, products, partnerships, and public image.

Friesens has long believed in equal employment opportunity as outlined in the Manitoba Human Rights Code. Friesens recruits, hires, trains, and promotes without regard to gender, sexual orientation, age, ancestry, race or colour, national origin, ethnic origin, religion or creed, marital or family status, political belief, source of income, physical or mental disability.

- b. Friesens Corporation has a documented Illegal Labour Policy.
- c. As of December 2024, Friesens Corporation did not have a structured program for identifying or assessing adverse impacts in operations, supply chains and business relationships (pertaining to forced labour and child labour).

4. The parts of Friesens Corporation's business and supply chains that carry a risk of forced labour or child labour being used and the steps Friesens Corporation has taken to assess and manage that risk

As of December 2024, Friesens Corporation had not yet done analysis that would determine if or in what way our activities and supply chains could potentially cause, contribute to, or be directly or indirectly linked to actual or potential risk that forced labour or child labour is used in our supply chains.

5. Any measures taken to remediate any forced labour or child labour

No measures were taken in 2024 by Friesens Corporation to remediate forced labour or child labour in our activities and supply chains.

6. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

No measures were taken in 2024 by Friesens Corporation in this area.

7. The training the Friesens Corporation has provided to employees on forced labour and child labour

Friesens Corporation did not provide specific training to staff or managers in 2024 pertaining to forced labour or child labour.

8. How Friesens Corporation assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

No measures were taken in 2024 by Friesens Corporation to assess our effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains.