



## FULLERGROUP

### **Introduction**

For the fiscal year ending December 31, 2024, this report has been prepared by Fuller Group Ltd. ("Fuller Group" or the "Company"), Business Number 101903813, in compliance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act"). Fuller Group Ltd. qualifies as a Reporting Entity under the Act, having a place of business in Canada, engaging in business activities within Canada, and meeting the necessary size thresholds relating to assets and employee count.

Fuller Group is committed to maintaining principles of honesty and integrity throughout its operations and to delivering high-quality products to its patrons. Historically, Fuller Group's operations and supply chain have been assessed as presenting a low risk of modern slavery issues. Nevertheless, the Company recognizes the global imperative to eliminate child labour and forced labour. In alignment with the requirements of Section 11 of the Act, this report outlines the measures undertaken by Fuller Group during the reporting year to detect and mitigate modern slavery risks within its operations and supply chain and describes plans for strengthening prevention efforts in the future.

### **Section A: Structure, Activities and Supply Chains**

Fuller Group is a privately held company that owns and operates 19 A&W restaurant franchises under license from A&W Food Services of Canada Inc., located across Manitoba. As part of the fast-food industry, the Company's operations are primarily focused on the distribution and sale of food products within Canada.

Fuller Group's supply chain consists of three principal Canada-based suppliers: A&W Food Services of Canada Inc., Gordon Food Service Canada, and Canada Bread. A&W Food Services of Canada Inc., as a key supplier, issued a Statement on Fighting Against Forced Labour and Child Labour in 2024, which is publicly available. This statement outlines several initiatives undertaken, including supply chain mapping, enhanced audit programs, supplier attestations, contractual updates, and employee training programs aimed at mitigating the risk of forced labour and child labour within its supply chain.

Given that A&W Food Services of Canada Inc. is the primary supplier to the Fuller Group, the initiatives and measures taken by A&W significantly contribute to the mitigation of potential risks within Fuller Group's own supply chain. The Company's strategic supplier relationships ensure a consistent and reliable supply of high-quality ingredients that align with its strict quality and ethical standards, enabling the Company to deliver products to its customers.

### **Section B: Policies and Due Diligence Processes**

Fuller Group is committed to conducting its business in full compliance with all applicable laws and regulations. Given that the Company's suppliers are exclusively Canadian entities recognized for maintaining high standards, and considering that A&W Food Services of Canada Inc., Fuller Group's primary supplier, has implemented significant policies, training programs, and remediation plans during the reporting year to address the risks of forced and child labour, the overall risk of modern slavery in Fuller Group's operations and supply chain is assessed to be low.



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As a result, Fuller Group did not establish specific standalone policies or formal due diligence processes addressing forced or child labour during the 2024 fiscal year. However, the Company acknowledges the importance of maintaining ethical and responsible business practices. Fuller Group remains vigilant and prepared to adapt its policies and procedures should the Company's risk profile change in the future, particularly in the event of a significant shift in its supply chain composition or import portfolio.

### **Section C: Forced Labour and Child Labour Risks**

During the financial year ending December 31, 2024, Fuller Group initiated a supply chain risk assessment focused on identifying potential exposure to forced and child labour risks. The assessment, launched in May 2024, drew upon data from the *Walk Free Global Slavery Index* and the *U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour* to evaluate risks associated with specific goods and geographic regions.

The assessment did not uncover any evidence of forced or child labour within Fuller Group's operations or immediate supply chain. Rather, the review was conducted to proactively identify where risks could emerge, recognizing that all sectors may face vulnerabilities, particularly where supply chains extend into higher-risk jurisdictions. Since that assessment, the Company's supply chain has not changed.

The analysis confirmed that Fuller Group's overall risk exposure remains low. All suppliers are based in Canada, a country identified as low-risk for forced and child labour practices. Nonetheless, the Company remains committed to maintaining vigilance and strengthening risk management practices as necessary.

### **Section D: Remediation Measures**

During the financial year ending December 31, 2024, Fuller Group did not identify any instances of forced labour or child labour within its operations or supply chain, and therefore did not implement any specific remediation measures.

Fuller Group notes that A&W Food Services of Canada Inc., a tier-one supplier, identified potential forced labour concerns within its supply chain during 2023 and undertook corrective action. A&W worked with the implicated suppliers to terminate subcontractor relationships and introduced new social compliance requirements to address the identified risks.

Should Fuller Group detect any indications of forced or child labour within its operations or supply chain in the future, the Company is committed to responding with appropriate and timely remediation measures. Fuller Group will address such issues thoughtfully and decisively to ensure that its business practices remain ethical and compliant with all applicable laws and standards.

### **Section E: Remediation of Loss of Income**



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During the financial year ending December 31, 2024, Fuller Group did not implement any remediation measures related to loss of income, as no instances of forced or child labour were identified within its operations or supply chain.

Should Fuller Group detect risks of forced or child labour in the future, the Company is committed to implementing appropriate remediation measures, including steps to remediate any resulting loss of income for affected or vulnerable families, consistent with applicable legal and ethical standards.

### **Section F: Training**

During the financial year ending December 31, 2024, Fuller Group did not conduct specific training programs related to forced labour or child labour. Based on the Company's risk assessment, the overall risk of modern slavery within its operations and immediate supply chain was determined to be low.

Fuller Group remains committed to maintaining vigilance and is prepared to adapt and implement employee training programs in the future should its risk profile materially change.

### **Section G: Assessing Effectiveness**

During the financial year ending December 31, 2024, Fuller Group did not undertake a formal assessment of the effectiveness of its measures to prevent forced labour or child labour, given the Company's evaluation that the overall risk within its operations and supply chains remained minimal.

Fuller Group remains committed to ongoing monitoring of its risk profile. Should the risk of forced or child labour increase in the future, the Company will implement mechanisms to assess the effectiveness of its initiatives and risk mitigation efforts.

### **Conclusion**

Fuller Group remains committed to upholding the highest standards of ethical conduct and compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. While the overall risk of forced labour and child labour within the Company's operations and supply chain has been assessed as low, Fuller Group is committed to ongoing monitoring and transparency. The Company will continue to review its risk profile and adapt its risk mitigation processes as necessary should circumstances change.



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**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 for the entity 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.

*KIRK FULLER*

Full Name

*PRESIDENT / CEO*

Title

*JULY 30 / 25*

Date

*K. Fuller*

Signature

I have the authority to bind Fuller Group Ltd.