



2024 Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

May 31, 2025

2024 Fiscal Report – Introduction

Canada has been a party to several fundamental conventions since 1930, on fundamental labour rights and has stated our country's commitment to the fight against modern slavery (both forced labour and child labour). This commitment not only includes accountability by government institutions, but also accountability of Canadian business entities that are either involved in manufacturing, producing, growing, extracting, or processing goods in Canada or elsewhere or in importing goods manufactured, produced, grown, extracted, or processed outside Canada. The reporting requirements are for Canadian business entities that meet two of the following 3 criteria, namely, \$20 million or more in assets, \$40 million or more in revenue and an average of 250 or more employees. Grand Valley Fortifiers Limited meets both the asset and revenue threshold requirements.

This report has been prepared by Grand Valley Fortifiers Limited in response to its reporting requirements imposed under Chapter 9 of the Statutes of Canada 2024, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff.

Grand Valley Fortifiers (GVF) is sensitive and respectful of human rights of people, particularly those most vulnerable and is committed to ensuring that products within its supply chain are not contributing to the exploitation of individuals through forced labour and child labour.

Organizational structure, activities and supply chain

Structure

Grand Valley Fortifiers Limited is a privately owned and operated company with its head office located in Cambridge, Ontario. Grand Valley Fortifiers Limited has 4 divisions namely: Grand Valley Fortifiers (proper), Farmers Depot, Valley Feeds and Direct Source Commodities, all of which are located in Cambridge, Ontario. Its company is overseen by a President and CEO. Each of the four divisions is overseen by either a manager, director, or a member of its senior leadership team. One person in each of the four divisions has oversight/control over purchasing. The four divisions utilize the same

Enterprise Resource Planning (ERP) and utilize a shared human resources department. The divisions operate in the following Sectors within the marketplace:

1. Agriculture, forestry, fishing and hunting
2. Manufacturing
3. Wholesale trade
4. Retail trade
5. Professional, scientific and technical services

Activities

Grand Valley Fortifiers (proper) is a vitamin & mineral premix company for livestock. It purchases individual raw materials, including mined products such as limestone and zinc oxide, partially mined & synthetically manufactured trace minerals, such as copper sulphate, as well as vitamins, essential oils, probiotics, enzymes and acidifiers (both organic and inorganic). While Grand Valley Fortifiers does not manufacture complete feed in its facility, complete feeds are toll-manufactured locally using Grand Valley Fortifiers' supplements, which are brought back to Grand Valley Fortifiers for retail sale. Grand Valley Fortifiers delivers premixes, supplements and feeds throughout Ontario and into a portion of the northern states of the United States of America. Complete feeds are also sold out to the western provinces of Canada. This is the largest division of Grand Valley Fortifiers with a combined premix and complete feeds purchase costs of around 54%.

Farmers Depot is a direct retailer (no manufacturing) of livestock farming supplies, ranging from animal-health products to personal protection equipment, to barn hygiene and water sanitation. Farmers Depot sells products to its customer base, located all-across Canada. This division accounts for approximately 10.0% of purchase costs for Grand Valley Fortifiers in 2024.

Valley Feeds is a retail store, serving local farmers in Cambridge and surrounding areas. It provides high-quality feeds for wild birds, dogs, cats, horses and all other livestock. It also offers farm supplies, pest control products, cat & dog toys and supplies and specialize in lawn & garden products. Valley Feeds represents approximately 1.0% of Grand Valley Fortifiers' yearly purchase costs.

Direct Source Commodities is a division of Grand Valley Fortifiers serving on-farm complete feed manufacturers. It provides US and Canadian-sourced commodities from primary processing plants to producers on farm, accounting for approximately 35% of GVF's yearly purchase cost.

Supply Chain

Collectively in fiscal 2024, Grand Valley Fortifiers purchased from 308 individual vendors within the four divisions. Under its ERP operating system, a vendor is defined as either a distributor that is purchased from, who sells goods that were manufactured by other businesses, or it is a manufacturer that is directly purchased from.

Similar to last year, 97% of the vendors Grand Valley Fortifiers currently purchases from, are located in either Canada or the United States of America. The remaining 3% of vendors are from France, Germany, Pakistan, Spain, Sweden and The Netherlands.

Grand Valley Fortifiers (Proper) utilizes a “Vendor Hub”, where vendors and the ingredients the vendors supply to GVF, must go through an approval process. This process is overseen by a member of the senior leadership team and requires approval at each level in its production process (Nutrition, Quality/HACCP, Production, Purchasing and Pricing). Any new vendor or manufacturer is required to complete a questionnaire, identifying specific vendor and manufacturer information such as location address(es), any product registration(s), any certification(s), etc.

Because Farmers Depot and Valley Feeds deal predominantly with direct retail of products, they only capture basic location, contact and banking information for its vendors in its ERP. No “supplier contracts” exist at Grand Valley Fortifiers currently.

In fiscal 2025, Completion of the Supplier Letter Questionnaire (Appendix A), will become a mandatory part of the supplier approval process for new vendors/suppliers.

Policies and due diligence processes

Each member of Grand Valley Fortifiers’ team receives an Employee Handbook “New Staff Welcome and Orientation Package” as a part of their on-boarding process. Included in this package is Grand Valley Fortifiers’ statement of vision on “Why we exist”, “What we do” and “Our core values for our company”. Its core values are:

1. **Passionate** – Serving customers innovatively and well.
2. **Humble Confidence** – Confidently choosing to forgo our status, deploy our resources and use of influence for the good of others before ourselves.
3. **Integrity** – Consistently honest while honoring commitments with our customers, co-workers and suppliers.
4. **Professional** – Committed to excellence in the way we lead, serve and relate.

- 5. Caring** – With a servant heart, truly caring for customers and co-workers. Find satisfaction in assisting with others' challenges and joy in witnessing their success.

Grand Valley Fortifiers is a Federally regulated company and as such follows the Federal Labour Code and acts in compliance with all federal workplace health and safety legislation. GVF's Health and safety Policy provides protection to all its employees from harassment, violence, injury or occupational disease and to make every effort to provide a safe and healthy work environment. It has a written procedure for addressing harassment and other work-related complaints and a company commitment to follow-up on complaints and see them through to resolution. During the hiring process, GVF ensures that all employees hired are legally authorized to work in Canada as either a Canadian citizen, as a Permanent Resident, or seeking employment with a work permit, etc. Legal residency and immigration document verification is conducted at the offer stages within its hiring process and kept on file.

Areas of concentrated risk in activities and supply chain

Countries of Risk

Walk free is an internationally recognized human rights group focused on the eradication of modern slavery <https://www.walkfree.org/global-slavery-index/> Their global slavery index looks at prevalence (proportion of population living in modern slavery), the vulnerability to modern slavery and the percent government response to modern slavery.

GVF recognizes that a lack of transparency exists, particularly in retail goods purchased by Farmers Depot and Valley Feeds, between the finished goods and the sourcing of raw materials (components). GVF acknowledges that raw materials may originate from countries of risk, especially for some specific categories. However, these are currently unknown and so GVF only has the capability to look at the countries that its vendors provide products to them from.

An investigation into all the countries of the vendors Grand Valley Fortifiers purchases from currently, save one, indicate that they all have a low prevalence and vulnerability with respect to modern slavery and high governmental response on the Global Slavery Index. Pakistan is the only country that Grand Valley Fortifiers purchases from, which has a significantly higher prevalence and vulnerability to modern slavery with a poor governmental response. The retail product purchased from the vendor in Pakistan represents 0.03% of Farmers Depot purchase cost for 2024 and 0.003% of Grand Valley

Fortifiers' purchase cost for 2024. The remaining countries (over 99%) of the vendors that Grand Valley Fortifiers purchases from all have low prevalence of and vulnerability to modern slavery and a good government response to modern slavery (as indicated on the Walk Free Global Slavery Index). These countries include Canada, USA, France, Germany, Spain, Sweden and the Netherlands.

Goods at Risk

The U.S. Department of Labour provides a comprehensive list of goods by country that have areas of high concentrated risk of child labour and/or forced labour.

[List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)

GVF examined and distilled the list of goods, provided by the U.S. Department of Labour, down to the relevant goods to its business. A review of the sectors/classification of goods on this website was compared against the ingredients and item classification codes used at Grand Valley Fortifiers.

From a raw material perspective, mineral ingredients, such as cobalt, copper, gypsum, salt, limestone and zinc would be applicable to the premix portion of its business at Grand Valley Fortifiers (proper). Because GVF has transparency, with respect to the actual manufacturers of these identified minerals, it can confidentially attest that none of the identified minerals have been sourced or purchased by Grand Valley Fortifiers from manufacturers residing within the problematic countries identified. Corn would be the only commodity impacting the complete feed portion of its business. However, all corn used in GVF's production of complete feeds, including the corn byproduct dried distiller's grains with solubles (DDGS), from ethanol or alcohol production, would be locally sourced (Ontario, Canada) or, in the case of DDGS, be either of Canadian or U.S. origin.

Goods such as rubber, tin and toys, could be a potential source of risk within its supply chain. This is because, as previously indicated, there is a lack of transparency, particularly with retail products at GVF's Farmers Depot and Valley Feeds divisions, between GVF and the raw materials/components that are used to manufacture final products such as equipment, dog toys, etc. that it purchases through distributors.

Forced labour remediation & Loss of income remediation.

To date, Grand Valley Fortifiers has not received any complaints relating to forced labour or child labour in its operations or supply chain, and as such has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

Training

New employees receive their “New Staff Welcome and Orientation Package” as a part of their training and are required to complete a number of corporate video training records, including:

1. An introduction to Grand Valley Fortifiers
2. A commitment to Philanthropy
3. GVF Family – Who we are.
4. GVF Corporate Video.
5. GVF Who We Are series – History, Innovation, Passion and Service.

In addition to these on-boarding training sessions, individuals will have specific training of standard operation procedures (both HACCP and non-HACCP job function related), as well as training required for their specific department’s requirements (example Transportation of Dangerous Goods, WHIMS, Safety Hub courses, etc.).

In Fiscal 2025, Grand Valley Fortifiers will be creating and implementing a training session package for each of the procurement specialists in each of its divisions. This training will assist them in understanding the scope of, and how to actively mitigate against, forced and child labour in GVF’s supply chain.

Steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods.

In fiscal 2024 Grand Valley Fortifiers has taken the following steps to mitigate the risk of forced labour or child labour:

1. Mapping activities
2. Mapping supply chains
3. Conducting an internal assessment of risks of forced labour and/or child labour in the organization’s activities and supply chains.

4. Distributed, collated, analyzed and reported on the supplier questionnaire distributed to our vendors within DSC, GVF and Farmer's Depot.

Grand Valley Fortifiers has used a pragmatic approach to identify the potential areas of risk for forced and child labour in its supply chain that are associated with both the type of goods that are purchased and the country that the goods are manufactured in. GVF has illuminated areas in its supply chain that can be improved, particularly the transparency Grand Valley Fortifiers has between its vendors and its manufacturers.

Monitoring effectiveness

As part of our commitment to ethical sourcing and compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)*, we undertook a proactive initiative to assess the transparency and accountability of our suppliers. In 2024, we distributed a comprehensive **Supplier Letter Questionnaire** (Appendix A) to our vendor network for Direct Source, GVF and Farmer's Depot (representing 99% of our business), focusing on their awareness of and adherence to labour standards, particularly in relation to forced and child labour. This questionnaire was designed to gather critical information about our suppliers' sourcing practices, their use of risk assessment tools, and the extent to which they monitor and verify compliance within their own supply chains.

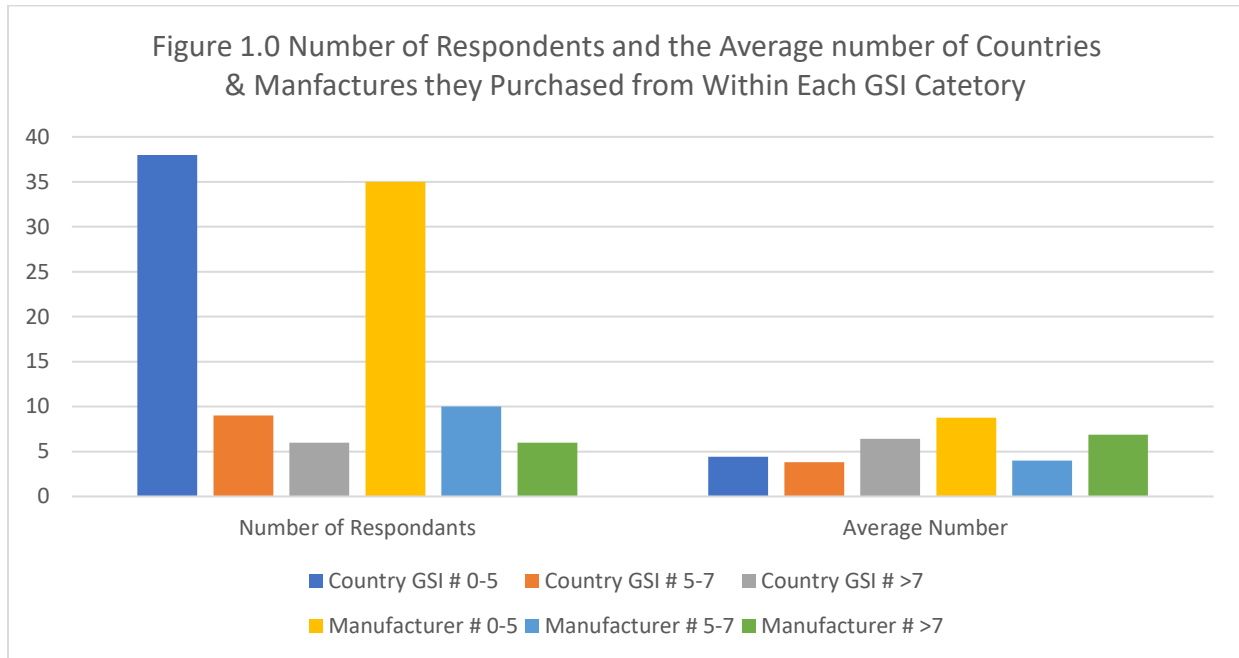
The questionnaire required suppliers to disclose whether they had submitted a Bill S-211 report in 2023, and to evaluate their sourcing risks using the **Walk Free Global Slavery Index** and the **U.S. Department of Labor's List of Goods Produced by Child or Forced Labour**. We also asked about their compliance with national and Canadian labour laws, their policies on human rights, and whether they conduct audits or obtain affidavits from manufacturers regarding Bill S-211 compliance. This initiative has provided us with valuable insights into the geographic and product-specific risks within our supply chain and has helped us identify areas where further engagement or due diligence may be required. It represents a foundational step in our ongoing efforts to build a more transparent, responsible, and ethical supply network.

Questionnaire Responses

The supplier questionnaire initiative yielded a response rate of approximately 40% across the three divisions, with 12 out of 30 suppliers responding from the DSC & GVF divisions and 55 out of 137 from the Farmers Depot division. This level of engagement provides a meaningful sample for evaluating supplier practices and sets a baseline for future outreach and improvement.

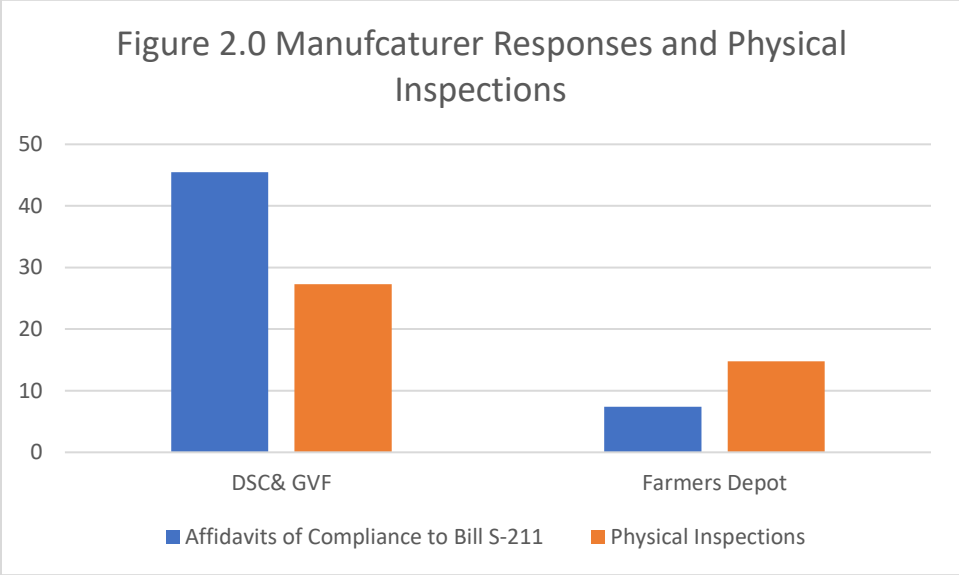
Of the respondents to the questionnaire, only 25% of suppliers from DSC & GVF and 11% of Farmer’s Depot suppliers were required to submit a report last year, with 100% compliance to submission of a report.

Figure 1.0



Results from our questionnaire indicate that most respondents fall into the lowest Global Sourcing Index (GSI) category (0–5) for both countries and manufacturers, indicating that the majority of sourcing occurs within lower-risk or less complex supply chains (Figure 1.0). As the GSI increases—signifying potentially more complex or higher-risk sourcing environments—the number of respondents decreases sharply. This suggests that fewer companies are engaging in high-GSI sourcing. Additionally, the average number of countries and manufacturers sourced from also declines as GSI levels rise. This trend implies that companies sourcing from higher-GSI regions tend to limit the number of suppliers or countries they work with, likely due to increased risks, costs, or oversight requirements. Overall, the data suggests a cautious and selective approach to sourcing in higher-GSI contexts, with companies preferring smaller, more manageable supplier networks in these environments.

Among the respondents, compliance with Canadian labour laws was notably strong. All respondents from GVF, DSC and Farmer’s Depot reported full compliance with both national and Canadian labour and employment laws. Additionally, no company indicated sourcing from manufacturers that engage in any form of forced for Child labour or that are known to practice discrimination or violate fundamental human rights. Overall, the findings suggest a high level of awareness and commitment to labour law compliance among participating suppliers.



45.5% of DSC&GVF's respondents have received affidavits of compliance to Bill S-211 from some their manufacturers. On the other hand, Farmers Depot's respondents had a significantly lower receipt of affidavits of compliance to Bill S-211. Approximately 27% of DSC & GVF respondents had performed physical inspections, compared to 14.8% of Farmer’s Depot, which indicates a more hands-on verification method with DSC & GVF (Figure 2.0). These differences reflect distinct risk management philosophies and resource allocations, providing valuable insights for stakeholders to evaluate the robustness of compliance programs and identify best practices for maintaining ethical and legal supply chains.

In fiscal 2025, Grand Valley Fortifiers will focus on completing the remaining supplier letter questionnaires for the GVF, DSC, and Farmers Depot divisions, and will also begin engaging vendors from Valley Feeds to complete their questionnaire.

Approval and attestation:

Pursuant to Fighting Against Forced Labour and Child Labour in Supply Chains Act, with particular reference to Section 1 (4) and (5), I have reviewed the information contained within this report for Grand Valley Fortifiers Limited, and as President and Chief Executive Officer, I hereby approve this report.

With the knowledge of Grand Valley Fortifiers' organizational structure, activities, policies and procedures, I attest that the information contained within this document, is true testament of the actions Grand Valley Fortifiers Limited has taken to address the disclosure topics required by Bill S-211 for the 2024 fiscal reporting year.

"I have the authority to bind Grand Valley Fortifiers Limited."



Ian Ross
President and Chief Executive Officer
May 31, 2025

Appendix A. Supplier Letter Questionnaire

NUMBER	QUESTION	RESPONSE
1	Was your company required to submit a report to the Minister of Public Safety and Emergency Preparedness in 2023?	Yes or No
2	Did your company submit a report in 2023?	Yes or No
3	If Yes, please provide a link to your report on your website	
4	GVF uses the Walk Free Global Slavery Index (GSI) to evaluate risk of contribution to child or Forced Labour. According to the link below, please answer the following 6 questions: https://www.walkfree.org/global-slavery-index/map/#mode=DATA:dimension=p	
	a. How many countries do you directly purchase from GSI between 0-5	
	b. How many countries do you directly purchase from with a GSI between 5-7	
	c. How many countries do you directly purchase from with a GSI > 7	
	d. How many manufacturers do you directly purchase from in countries with a GSI between 0-5	
	e. How many manufacturers do you directly purchase from in countries with a GSI between 5-7	
	f. How many manufacturers do you directly purchase from with a GSI > 7	
5	GVF uses the U.S Department of Labour List of Goods Purchased by Child Labour or Force Labour. According to the link below, please answer the following 4 questions below: https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods	
	a. Does your company purchase Goods from any countries listed?	Yes or No
	b. If Yes, please list which Goods and from what country	
	c. Does your company purchase Downstream Goods from any countries list?	Yes or No
	d. If Yes, please list which Downstream Goods and from what country	
6	Are you and your manufacturers in compliance with your/their countries national laws and Canadian laws at it pertains to labour and employment?	Yes or No
7	Are you and your manufacturers following employment laws as they pertain to compensation and hours of labour?	Yes or No
8	Are you purchasing from any manufacturer that utilizes in any manner forced labour or child labour?	Yes or No
9	Is your company purchasing from any manufacturer(s) that is (are) known to be discriminatory and in violation of basic human rights?	Yes or No
10	Do you receive affidavits from your manufacturers that they are compliant with Bill S-211?	Yes or No
11	Do you physically inspect/audit your manufacturers to ensure they are compliant with Bill	Yes or No