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REPORT ON FORCED AND CHILD LABOUR IN CANADIAN SUPPLY CHAINS

GREENFIELD GLOBAL INC.

REPORTING YEAR: 2024

SUBMITTED TO THE GOVERNMENT OF CANADA: MAY 14, 2025



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BACKGROUND

Greenfield Global Inc. (“GGI”) is a company incorporated federally in Canada with headquarters in Mississauga, Ontario, Canada. It has operating sites in Canada, with affiliate and subsidiary companies that have operating sites in the United States of America (the “US”), the Republic of Ireland and the United Kingdom. In Canada (Ontario and Quebec), GGI has 4 distilleries, 1 packaging and 1 distribution site.

GGI is a leading supplier of high-purity alcohols, specialty solvents, custom blended solutions and fuel ethanol to businesses worldwide. The primary markets GGI operates in are the manufacture and wholesale of renewable fuels, beverage alcohol, life science, food, flavour, fragrance, personal care and industrial alcohols. Annually, the company fulfills over 35,000 orders in more than 50 countries through our extensive global supply chain.

GGI’s low-carbon ethanol helps industry decarbonize and meet net-zero targets, while its team of researchers and engineers continue to innovate and produce other sustainable fuels and chemicals such as green hydrogen, green methanol, sustainable aviation fuel and renewable natural gas.

The company’s mission statement is to unlock the potential of people, partnerships and nature to accelerate sustainable solutions for the health of the planet.

GGI is family owned and operated and has been awarded “Canada’s Best Managed Companies” Platinum-level designation since 2015.

As of January 31, 2025 GGI employs 492 employees at its Canadian locations and 775 globally. Its revenue is in excess of \$40 million, and thus meets the criteria to report in compliance with the *Forced Labour in Canadian Supply Chains Act* (the “Act”).

Additional information about our operations can be found at [greenfield.com](https://www.greenfield.com)

Enclosed is GGI’s report for the 2024 fiscal year.

POLICIES & REPORTS

GGI has a corporate policy, “Principles and Standards” (the “Principles”), that highlights our requirements for doing business with vendors/suppliers, with a specific section that focuses on Workforce and Workplace Practices. We emphasize that we do not condone forced or child labour and expect that our suppliers follow suit. The Principles are posted on our website here, [GG-Principles-and-Standards-ENGLISH-1.pdf \(greenfield.com\)](#) and are available to all vendors and other stakeholders.

Further, each of the operational sites in Canada follow vendor/supplier on-boarding procedures that coincide with the Principles.

GGI published its first ever ESG (Environmental, Social, Governance) report in 2024 for the 2023 fiscal year. This report covered a number of topics related to GGI’s management of its supply chains and labour force, including governance & ethics, risk management, responsible sourcing, occupational health & safety, people & culture, and human rights. Further information and our report can be found at [ESG Report | Greenfield](#).

DUE DILIGENCE PROCESS

First, GGI examined its own operations. GGI confirms that no forced or child labour is used at any of its company-owned facilities or operations worldwide. GGI complies with the laws in Canada, the US, Ireland and the United Kingdom as they apply to our employees. As of January 31, 2025, GGI does not employ personnel under 18 years of age, and GGI will continue to monitor to ensure that we do not employ minors. Employees are free to leave their employment with Greenfield subject only to ordinary contractual and legislated notice periods, as permitted by the laws in Canada, the US, the United Kingdom and Ireland.

As a second step, GGI mapped its supply chains and performed a risk assessment of its vendors focused on these criteria:

- Region/country of origin of the supply
- Industry
- Volume and value of materials purchased

These criteria were selected and applied based on review of these resources:

[1] Ending child labour, forced labour and human trafficking in global supply chains (oecd.org)¹

[2] Global child labour trends²

[3] International Labour Organization – Global Estimates of Modern Slavery Forced Labour and Forced Marriage³

¹ [Ending-child-labour-forced-labour-and-human-trafficking-in-global-supply-chains.pdf \(oecd.org\)](#)

² [Statistical Report: Global child labour trends 2008 to 2012 \(ilo.org\)](#)

³ [wcms_854733.pdf \(ilo.org\)](#)



This step included a review of GGI's raw material suppliers, utility vendors, and packaging suppliers. Raw materials were assigned a risk level of low, medium or high risk as it relates to the probability of forced or child labour being used in their production. GGI's supplier contracts require that they agree to operate in compliance with all applicable laws.

In addition, GGI performed due diligence by:

- [1] Evaluating whether its suppliers had publicly available ESG reports that demonstrated their commitment to monitoring and assessing the risks of forced and child labour in their supply chains.
- [2] Reviewing the Government of Canada's log for suppliers who had submitted their own reports in accordance with Bill S-211 in 2024.
- [3] Noting whether our suppliers are members of a globally recognized ESG/Sustainability platform, including Sedex and Ecovadis® and Responsible Care®, which platforms require them to demonstrate their commitment to monitoring and assessing the risks of forced and child labour in their supply chains.

If none of the above were identified, we asked those suppliers to complete a questionnaire covering similar questions to those that GGI is required to answer as part of its compliance with the Act (alongside this report). The goal of the questionnaire was to learn about the actions that our suppliers are taking to discover and mitigate forced or child labour in their production and supply chains, and to receive reassurance that our suppliers are not aware of the use of forced or child labour in their supply chains.

Based on the above criteria, GGI identified 65 suppliers to assess this year. As mentioned, these included utility providers to the Canadian manufacturing locations, raw material suppliers used in the production of pure and denatured ethanol blends, and suppliers of packaging components.

32 suppliers were identified as having met the criteria of either:

- [1] having an ESG report and/or policies or;
- [2] subscribing to/being members of an internationally recognized sustainability platform; or
- [3] having filed a report in response to Bill S-211 in 2024.

Based on these criteria, GGI is comfortable with the business practices these entities have in the prevention and mitigation of forced and child labour in their supply chains.

The remaining suppliers were sent our questionnaire. Of those suppliers that responded, none identified that they were aware of forced or child labour in their supply chain. Many of our suppliers indicated that they: monitor their own suppliers; require suppliers to have policies in place related to human rights issues, including forced or child labour; and map their supply chains. Some suppliers have started to conduct risk assessments and audit their own suppliers. As for how our suppliers deal with training, some indicated that they have mandatory training processes in place ranging from annual training of employees, to reviewing their organization's code of conduct.

Through our due diligence processes, GGI discovered that the majority of our suppliers operate in the US or Canada, and they have explicitly indicated that they follow local, state/provincial and federal laws and guidelines which prohibit child or forced labour, they consider themselves low risk, and that their employees are expected to know the laws and abide by them.



The intention of GGI is to continuously monitor suppliers and gather data on their supply chain practices. If suppliers have been identified that engage in business practices that violate the Principles, or who identify forced or child labour in their supply chains, then GGI will not continue to do business with these suppliers.

High Risk Raw Materials

Materials deemed to be high risk originate from countries and regions where forced and/or child labour practices are more prevalent or known, as cited in the sources above.

GGI does not source raw materials from anywhere in Africa, and sources very few raw materials from Asia. The products sourced from China and India include certain flavour and fragrance materials and certain strains of yeast.

One material that is pertinent to the production of ethanol is sourced from a supplier in China. This supplier indicated that it monitors its own suppliers. As part of our due diligence process, we have continued to follow up with them to get more information on their business practices. They have confirmed in writing that they do not use forced labour in their supply chains. We will continue to monitor them periodically to ensure they are abiding by our Terms & Conditions of doing business.

Other suppliers to GGI who source materials from China have sustainability reports readily accessible through their websites and have robust systems in place to mitigate and prevent the use of forced or child labour in their supply chains. None of the raw materials that sourced by GGI are from the Xinjiang region of China.

GGI continues to do business with the two cane alcohol suppliers from Brazil mentioned in last year's report. We have no concerns with their business practices and they continue to provide the same reassurances that they are not using forced labour or child labour in their supply chains.

Based on the information gathered from our suppliers who supply high risk raw materials to GGI, no supplier indicated that they use either forced or child labour in their supply chains and GGI has no reason to believe otherwise.

Medium Risk Raw Materials

Materials deemed to be medium risk are materials that have a high dollar value or relatively large order quantities, but do not historically originate from countries that have known forced or child labour practices. Examples of medium risk materials include agricultural materials used as the feedstock for ethanol production. While those raw materials do not originate from countries or regions of known or prevalent forced or child labour practices, they are from the agricultural industry, GGI purchases a high volume of those materials, and these raw materials are incorporated into GGI's finished goods.

As an ethanol manufacturer, GGI receives the majority of its feedstock from corn grown in Ontario, Canada. GGI has contracts in place with its agricultural suppliers that require them to abide by local laws and regulations, including labour laws in Ontario, Canada.

Low Risk Raw Materials



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Materials deemed low risk would be those that are not sourced from a high-risk country, are not agricultural products and do not go into the finished goods manufacturing process. Examples of such low-risk raw materials include office supplies or mechanical/manufacturing equipment.

Utilities provided to GGI from the municipalities in which we operate also fall into this category. As our operations exist predominantly in Canada and the US, these suppliers must abide by local laws and regulations related to responsible business practices.

Where applicable, GGI has contracts in place with such suppliers that require them to abide by local laws and regulations, including labour laws in Ontario, and Quebec, Canada.

TRAINING

GGI issues annual customized mandatory training on understanding forced or child labour in the supply chain to all its Canadian employees, plus specific employees in the United States who are involved in procuring raw materials that are eventually distributed in Canada. It is tailored to our business and was developed internally. The training explains what forced or child labour is, the regulatory obligations to report, and what is included in GGI's report to the government. Employees were required to answer quiz questions requiring an 80% or higher score to pass and be considered properly trained. Employees residing outside of Canada that work with the Canadian entity and business units are also required to complete the annual training.

In addition, all employees must sign GGI's code of conduct on commencement of employment, which, amongst other things, outlines our principles around the use of forced and child labour in our activities, including the supply chain.

The company plans to amend its training from time to time, for example by providing additional training for employees that are embedded in the supply chain process.

REMEDATION MEASURES

GGI refers to the Principles as the expression of our standards for supplier and employee conduct. The Principles document is available on our website and is shared with suppliers and, upon request, customers. It outlines our current business practice as it relates to being a responsible corporate citizen, and demonstrates that we take the treatment of people in the workplace seriously. If we identify a supplier in our supply chain that is not like-minded in their business conduct or violates applicable laws, specifically as it relates to forced or human labour, we will cease doing business with them unless and until the non-compliance is corrected to our satisfaction.

REMEDATION OF LOSS OF INCOME

GGI has not identified any suppliers or vulnerable families within its supply chain, and therefore has not considered any remediation activities related to loss of income.



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ASSESSING EFFECTIVENESS

GGI embeds human resources staff at all of its operating sites. It is the responsibility of those individuals, along with the site management, to ensure that employees adhere to GGI's Principles, which includes a zero-tolerance policy for forced or child labour within our own operations.

As part of this report, GGI has completed and submitted the questionnaire. As stated above, GGI prepared a similar questionnaire for its suppliers to learn about the actions that our suppliers are taking to discover and mitigate forced or child labour in their production and supply chains, and to receive reassurance that our suppliers are not aware of the use of forced or child labour in their supply chains.

The intention of GGI is to continuously monitor suppliers and gather data on their supply chain practices. If suppliers have been identified that engage in business practices that violate the Principles, or they identify forced or child labour in their supply chains, then GGI will cease doing business with them unless and until the non-compliance is corrected to our satisfaction.

Board 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 the report for the entity or entities 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.

Howard Field
President & CEO
Date: May 12, 2025

Signature

I have the authority to bind Greenfield Global Inc.