

BILL S-211

Bill S-211 is an act that is part of the Fighting Against Forced Labour and Child Labour in Supply Chains Acts, which together form the Canada Modern Slavery Act. This bill was also designed to amend the Customs Tariff.

Modern Slavery Statement for the Fiscal Year September 1, 2024, ending August 31, 2025.

This statement is made pursuant to Bill S-211, an act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by La Coopérative Agricole d'Embrun Ltée ("Embrun Co-op") to identify and address the risks of forced labour and child labour in its business operations and supply chains during the fiscal year commencing September 1, 2024, and ending August 31, 2025. This is the second filing for Embrun Co-op to ensure compliance with Bill S-211.

Embrun Co-op is committed to respecting human rights and working towards ensuring our supply chain is free from forced labour and child labour.

Company Structure

Embrun Co-op was established in January 1944. It does business under the business name of La Coopérative Agricole d'Embrun Ltée with its head office in Embrun, Ontario.

The company is owned 100% by its members (3,600), each member owning one share. It operates with a board of directors elected at the Annual General Meeting.

The company operation encompasses crop inputs, crop custom application, livestock feed, fuel and propane and retail stores. These seven divisions; Crops, Grain Elevators, Feed, Agtrek, Energy, RONA and the Your Independent Grocer, have become the foundation of Embrun Co-op. Each division has its own manager who is then overseen by the General Manager.

Each division is supported by a single or a few major partners. This allows Embrun Co-op to leverage the systems and policies in place in larger organisations.

WHOLLY-OWNED SUBSIDIARIES

Agtrek Nutrition Inc.: Agtrek Nutrition Inc. is a wholly-owned subsidiary of Embrun Co-op and is incorporated under the Ontario Business Corporations Act. The corporation's principal activity is consulting.

2714022 Ontario Inc.: 2714022 Ontario Inc. is a wholly owned subsidiary of Embrun Co-op and is incorporated under the Ontario Business Corporations Act. The corporation's principal activity is investment management.

16011977 CANADA INC.: 16011977 CANADA INC. is a wholly-owned subsidiary of Embrun Co-op and is incorporated under the Canada Business Corporations Act. The corporation’s principal activity is hardware retail investment management.

Supply Chain

Our supply chain encompasses many products across the company. Agronomy products are sourced through a main supplier. Our procurement of energy and propane is also sourced through two main suppliers. Our feed division purchases products through several national suppliers. The majority of our retail products are purchased through two main suppliers in Canada.

Our suppliers are purchasing the products from many countries globally.

Risks in Supply Chain

Our company is committed to respecting human rights and will work towards ensuring that forced labour and child labour is not a part of any product within our supply chain.

To date, no material risk has been identified.

Actions Taken

Our company is committed to developing and conducting an internal assessment of risks of forced labour and/or child labour in our organization’s activities and supply chains.

Our company is committed to developing and implementing due diligence policies and process for identifying, addressing and prohibiting the use of forced labour and/or child labour in our organization’s activities and supply chains.

As this is our second reporting on our supply chain in response to Bill S-211 requirements, we have verified that each of our major suppliers has presented a similar report on behalf of their own actions.

Supplier Company	Products	Report Filed
Loblaw Companies Limited	Retail- Grocery	Modern Slavery Act Report - Fiscal Year 2023
Growmark, Inc.	Crop Inputs, Seed	Modern Slavery Statement for the Fiscal Year September 1, 2023, ending August 31, 2024.
RONA Inc.	Retail- Hardware	2023 REPORT UNDER THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Le Groupe Harnois Inc.	Energy Products	Rapport sur le travail forcé et le travail des enfants Exercice financier se terminant le 30 avril 2024
Empire Company Limited	Convenience Products	Fighting Forced Labour and Child Labour FY2024 Report
MTY Food Group	Country Style- Baked goods and Hot Beverages	MODERN SLAVERY ACT ANNUAL REPORT 2024
Archer Daniels Midland (ADM)	Animal Nutrition Products	Supply Chain Due Diligence October 2024
Orgill	Retail Hardware and Farm	Orgill Statement Against Modern Slavery – Published May 31, 2024
Parrish & Heimbecker & New Life Mills	Agricultural Products	Canadian Report on Forced Labour and Child Labour in Supply Chains May 31, 2024
Sharpe Farm Supplies Ltd	Agriculture Products	Modern Slavery Statement for the Financial Year ended 2023

Our organization is committed to developing procedures and policies in order to monitor our suppliers, enacting measures requiring our suppliers to have policies and procedures in place for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.

We are committed to presenting the annual report to all company management and employees as well as making it available to the public on our website.

Risk Assessment

Our company intends to continue the process of verifying that our suppliers do not distribute goods and services that support or condone child labour or forced labour in Canadian or International supply chains.

Our company is communicating with partners in the industry to work together to develop steps going forward to identify risks within our supply chain.

Our company is developing policy and procedure for our management and employees to learn about, identify and follow company policy on the use of forced labour and/or child labour in our supply chains.

Remediation

Embrun Co-op recognizes the responsibility that we share with our suppliers to provide remedy and guard against forced and child labour. Successful remediation is not easy to achieve and requires a victim-led, consultative, and multi-stakeholder approach.

Embrun Co-op recognizes the complexity and sensitivity of addressing instances of forced labour or child labour within the supply chain. As we are not currently equipped with internal expertise to manage such cases independently, our remediation process will involve collaboration with qualified external experts.

Definition of a complaint: A complaint is a report of a violation that has occurred in our supply chain and internal business and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

1. **Receiving a complaint:** Upon receiving a credible complaint or identifying a concern related to forced or child labour, Embrun Co-op will engage an independent third-party specialist or organization with expertise in human rights and labour practices. This external partner will be responsible for conducting a thorough assessment and investigation of the issue.
2. **Designing a remediation procedure:** Based on their findings, the expert will develop a tailored remediation plan, which may include corrective actions, victim support strategies, and recommendations for systemic improvements. Embrun Co-op will commit to implementing the prescribed actions in full and will maintain open communication with the external expert throughout the process.
3. **Ongoing support and monitoring:** Scheduled follow-ups will be conducted in collaboration with the external expert to monitor progress, ensure that remediation efforts remain effective, and provide continued support where necessary. This approach aims to uphold our ethical standards and contribute to long-term improvements in labour conditions within our supply chain.

Training

Embrun Co-op is in the process of developing a comprehensive training policy that encompasses awareness and understanding of issues related to forced labour and child labour. The policy will also address the identification of potential risks within our supply chain and outline clear remediation procedures. This training will be mandatory for all employees involved in supplier relations.

The training policy will be incorporated into our annual policy review and will be communicated to all staff over the course of the year.

Effectiveness Assessment

The effectiveness of the training policy will be assessed annually as part of our ongoing commitment to continuous improvement. The training content will be reviewed and refreshed each year to ensure it remains current and relevant. Following the implementation of the training program, Embrun Co-op will track and report the number of employees trained annually. This data will help evaluate the reach and impact of the training, identify any gaps in knowledge or participation, and inform any necessary adjustments to enhance the program's effectiveness.

Sign off

This report has been presented to our company's board of directors and approved.

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending 08/31/2025. It has been issued on behalf of La Coopérative Agricole d'Embrun Ltée and approved by its board of directors.

Signed,



President of the Board of Directors

May 28, 2025

Date



Secretary of the Board of Directors

May 28, 2025

Date