

INTER-CANADA FISHERIES

A Division of M.B. Product Research Distributing Inc.

IMPORTING • EXPORTING • DISTRIBUTING

Forced and Child Labour Annual Report for M.B. PRODUCT RESEARCH DISTRIBUTING INC.

PURPOSE

This annual report for the calendar year ending December 31st, 2024, has been created by M.B. Product Research Distributing Inc. ("**M.B. Product**" or "**We**" or "**Our**") for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting against Forced Labour and Child Labour in Supply chains Act*, SC 2023 c 9 (the "**Act**")

OUR COMMITMENT

M.B Product is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that M.B. Product imports into Canada.

As a responsible importer we are dedicated to ensuring customer satisfaction and continual improvement whilst safeguarding the resources, communities, and environment in which we operate. We recognize the looming risk of forced and child labour and are committed to addressing them through a collaborative approach with our suppliers and workforce so that we can understand and mitigate these risks better. We are dedicated to fostering transparency throughout the organization and in our efforts to address and eliminate modern slavery within the supply chain.

CATEGORIZATION SECTOR AND INDUSTRY

M.B. Product is an entity under the Act

In terms of the Act's threshold requirements, M.B. Product has at least \$20 million in assets for at least one of its two most recent financial years and has generated at least \$40 million in revenue for at least one of its two most recent financial years.

Our Operations

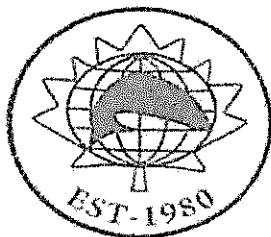
M.B. Product is the sole parent company operating in the seafood industry with headquarters in Brampton, Ontario, Canada. The organization consists of a warehousing department, sales, accounting, human resources, purchasing, customer service and supply chain/logistics/food safety teams - each of their leads reporting to the company's management. Our core business activities include: Importing seafood (frozen, canned, and fresh) globally from various suppliers, distributing products across Canada and

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exporting products to the United States.

STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

Our Supply Chain

Our supply chain department supports its distribution operations across Canada and centralizes operations of sourcing frozen and canned seafood products globally. We would describe our supply chain as rather complex, as we source our products from multiple suppliers spanning different locations globally (both domestic and international, including the United States) in order to support our distribution and export goals. These suppliers primarily include corporations offering private label merchandise, along with independent regional brands and private label processors and packers. The supply chain team further ensures that the suppliers meet our quality standards, corporate requirements and has the capacity to cater to our supply- demand.

Steps Taken by M.B. Product in 2024

M.B. Product recognizes the risk of Modern Slavery and knows it can be present in any country or sector. 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, or of goods imported into Canada, M.B. Product has in place, due diligence policies and processes for identifying, addressing, and prohibiting the use of forced and/or child labour in the organization's activities and supply chains, including having a supplier code of conduct. These policies and due diligence processes are set out in the section below. M.B. Product also continues to enforce its grievance mechanisms, including maintaining a whistleblowing procedure. The whistleblowing procedure allows employees to report any breach of the Code of Conduct. This policy applies to all its employees, associates, contractors, subcontractors, suppliers and processors.

POLICIES AND DUE DILIGENCE PROCESSES

M.B. Product maintains several policies and processes which affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- a) Having a Supplier Code of Conduct (the "**Code**") that sets out the company's requirements and expectations for conducting business with prospective vendors. Our Code reiterates expectations that Our suppliers be good corporate citizens and comply with all applicable laws and regulations. Suppliers are expected to understand the business practices of their sub-suppliers and contractors

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and to ensure that they operate within similar guidelines.

- b) Requesting that Our suppliers sign a Letter of Guarantee (the "**Letter**"), as a part of our due diligence process. The Letter requires them to attest that their organization is committed to respecting and protecting the human rights and safety of the people who work for them in accordance with all applicable state and federal laws and regulations. Suppliers must have policies preventing physical, verbal and mental abuse and shall have a framework for addressing employee grievances and deploying remediation measures wherever necessary. M.B. Product requires its suppliers to attest that they do not engage in or support the use of child labour or forced labour in their daily operations. Moreover, M.B. Product internally maintains supplier's sustainability certificate records during the onboarding process.
- c) Circulating mandatory self-questionnaires to suppliers in order to better understand supplier labor onboarding practices, terms and conditions of employment, supply chain management, and grievance management. The result from these questionnaires helps us to enhance contractual terms with suppliers, encourages them to opt for sustainability certifications such as an MSC, a certificate which condemns forced labour and introduces measures to reduce risks of child and forced labour, as well as to opt for third party inspections in their local jurisdiction (if applicable). Furthermore, M.B. Product strongly encouraged its suppliers—particularly those based in high-risk regions such as Latin America and Asia—to conduct annual Codes of Conduct (CoC) or social audits, or to undergo third-party assessments. For suppliers who provided social audit reports, the results were assessed, and a formal procedure was developed outlining the steps required to demonstrate compliance within a designated follow-up period, should any issues be identified.
- d) Maintaining a grievance mechanism whereby any information regarding the potential violation of the Code, whether discovered by M.B. Product's employees, agents, or suppliers, shall be promptly reported to M.B. Product's Human Resource and Logistics Department. An internal company code of conduct and ethics (the "**CoC**") is in place which safeguards the rights of the employees. This internal policy also protects the rights of whistleblowers.

FORCED LABOUR AND CHILD LABOUR RISKS

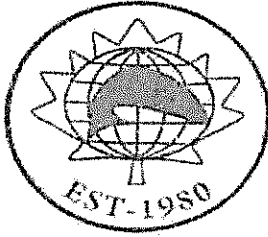
Following the submission of last year's report, M.B. Product developed an action plan aimed at evaluating insights gained over the past year and identifying potential risks, along with measures to mitigate the risk of forced or child labour within their supply chain. The assessment did make M.B. Product prone to certain vulnerabilities in their operations, primarily stemming from their reliance on international vendors – particularly within the seafood industry. However, these risks were proactively managed through the implementation and

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reinforcement of aforementioned policies and due diligence processes, including the annual review and reinforcement of our Supplier Code of Conduct.

REMEDATION MEASURES

M.B. Product has continued to assess their compliance program to identify and mitigate potential risks in their supply chain network. It has not identified any forced labor or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

REMEDATION OF LOSS OF INCOME

M.B. Product has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any remediation measures for loss of income.

TRAINING PROVIDED TO EMPLOYEES

In 2023, M.B. Product formally identified key responsibilities within the organization to address and mitigate the risks of forced and child labor within their supply chain. Since then, they have made deliberate efforts to ensure all relevant team members are fully informed of their roles and responsibilities in this regard.

M.B. Product's Sourcing and Quality Assurance teams received training on appropriate vendor employment practices and acceptable working conditions, including policies related to involuntary labor, human trafficking, and child labor. Additionally, their Human Resources and Quality Assurance departments jointly developed and delivered in-person training sessions for staff, reinforcing employee rights under their employment contracts and emphasizing their ability to voice concerns without fear of retaliation.

ASSESSING EFFECTIVENESS

At M.B. Product, all employees are required to review and sign the company's Code of Conduct prior to their first day of employment. As an additional measure, the Human Resources team has implemented a mandatory e-learning module for all staff. This training educates employees on the implications of participating in, or being subject to, practices related to modern slavery and violations of basic human rights, serving as both an internal control and a proactive compliance measure.

In parallel, M.B. Product continues to evaluate its existing suppliers through established policies and due diligence protocols. The company requires both new and current vendors to annually sign a declaration

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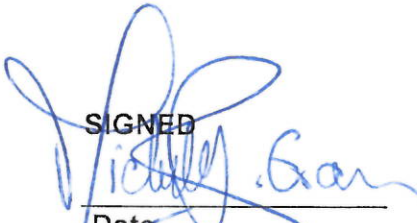
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affirming compliance with the Modern Slavery Act. This declaration outlines that any breach may result in contract termination if adequate remediation is not undertaken. Supporting documentation—including completed supplier self-assessment questionnaires, Supplier Code of Conduct audits (where applicable), and Letters of Guarantee—is maintained internally for accountability and record-keeping purposes.

APPROVAL AND 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 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

IN WITNESS WHEREOF the authorized signing officer(s) of M.B. Product Research Distributing Inc. have executed this report as of the effective date of the signatures set out below.

SIGNED

Date
May 28, 2025

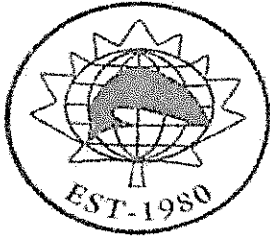
)
) **M.B. PRODUCT RESEARCH DISTRIBUTING INC.**
)
) **Name:** Michelle Benhaim-Gram
)
) **Title:** Co-Owner

I have authority to bind M.B. Product Research Distributing Inc.

SIGNED

Date
May 28, 2025

)
) **M.B. PRODUCT RESEARCH DISTRIBUTING INC.**
)
) **Name:** Philippe Benhaim



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)
) Title: Co-Owner

I have authority to bind M.B. Product Research Distributing Inc.

SIGNED

28/06/25
Date

)
) M.B. PRODUCT RESEARCH DISTRIBUTING INC.
)
) Name: Julien Benhaim
)
) Title: Co-Owner

I have authority to bind M.B. Product Research Distributing Inc.