



LA ROCCA CREATIVE CAKES INC.

*Fighting Against Forced Labor and Child Labor in Supply Chains Act Report*  
2024

For the fiscal year ended September 30, 2024



## Introduction

This report is made pursuant to subsection 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C., 2023, c. 9 (the “**Act**”) on behalf of La Rocca Creative Cakes Inc. (“**La Rocca**” or the “**Company**” or “**we**” or “**our**”).

The La Rocca tradition of dessert making began 60 years ago in Naples, Italy, where our family’s passion for the art of baking inspired the many original and unique recipes we have today. In 1986, La Rocca was established in Canada. We have since grown to become one of the most respected artisanal dessert manufacturers in North America. We create a uniqueness in every cake flavour by combining fresh and delicious ingredients, sourced locally and from around the world. Many of our suppliers have published their own reports under the Act, and much like La Rocca are committed to reducing the risk that forced labour and child labour could be used in their global supply chains.

This report outlines aspects of our human rights actions and plan for the 2024 financial year. Our human rights policies continue to develop in accordance with widely accepted global standards such as the United Nations Guiding Principles on Business and Human Rights.

## Steps taken to prevent and reduce the risk of forced labour and child labour

As an Ontario-based company, La Rocca follows all applicable labour legislation under Canadian law, including but not limited to the Ontario Human Rights Code, the *Employment Standards Act*, the *Occupational Health and Safety Act*, and the International Labour Organization’s published labour standards. We have a rigorous hiring process to ensure that all employees are recruited voluntarily and are legally permitted to work in Canada.

We have brought the fight against forced labour and child labour to the forefront of developing our internal processes. During the 2024 fiscal year we consolidated our internal policies into an overarching Code of Conduct, emphasizing the prevention of forced labour and child labour.

## Structure, Activities, and Supply Chains



### *Structure*

At La Rocca, we are driven by a vision to redefine the landscape of premium desserts in North America. Our mission is not just to create the finest desserts but to inspire passion and pride in every creation that leaves our bakery.

La Rocca is a privately-owned corporation and has been in business since 1986. We are located in the City of Richmond Hill, Ontario and conduct business only from this location. La Rocca employed approximately 300 during the 2024 financial year, all of whom worked in Ontario. Michael Givens has been the president of La Rocca since 1986.

### *Activities*

La Rocca's core business broadly centers on the production of a diverse array of premium cakes, with products available across thousands of grocery stores, specialty food stores, and cafes across North America. We make cakes and pastries available in grocery stores and have two of our own proprietary retail stores/kitchens. La Rocca's Creative Kitchens are open to the public, where the wider community can engage with the Company to discover new creations and products.

### *Supply Chains*

La Rocca uses only the freshest quality ingredients in every cake and proudly supports Canadian dairy farmers by using Canadian milk, cream, cream cheese, and other dairy products. La Rocca almost exclusively partners with suppliers who have their own robust policies in place to guard against the risk of forced labour and child labour in their supply chains.

Ingredients such as cocoa, sugar, and vanilla are sourced globally, with a focus on regions known for high-quality raw materials. These ingredients are then processed and packaged in La Rocca's local production facilities and bakeries.

### **Policies and Due Diligence Processes in relation to Forced Labour and/or Child Labour**

La Rocca strives to embed aspects of responsible business conduct into all policies related to our own domestic recruitment as well as our relationships with business partners.



We review the ingredients used in our supply chain to determine which supply chains carry the highest risk of forced labour and child labour, from sourcing of raw materials to receipt at our facilities. Ingredients which raw materials originate outside of Canada can be the most difficult to map, given lower visibility into the end of the supply chains, however our suppliers are aligned with us on the importance of reducing the risk that forced labour and child labour is used in our supply chains. Many of our suppliers have published their own reports under the Act.

During the 2024 fiscal year, La Rocca continued to develop its existing policies to put an exceptional emphasis on the risk of forced labour and child labour in its supply chains. This year, the Company finalized their Code of Conduct Policy which directly addresses the prohibition of forced labour as follows:

*“La Rocca Creative Cakes Inc. is committed to maintaining a work environment free from forced, bonded, or compulsory labour. We do not engage in or support the use of forced labour, and we uphold the highest standards of human rights and ethical labour practices. All work must be voluntary, and employees must have the freedom to terminate their employment at any time without fear of reprisal or penalty. We require all employees, contractors, and suppliers to adhere to this principle and comply with all applicable laws and regulations regarding forced labour. Any violations of this policy will be taken seriously and may result in disciplinary action, including termination of employment or business relationships.”*

Our employees are given in-depth training on their rights as employees to a safe work environment, free from harassment and discrimination. Our workplace harassment policy states that harassment will not be tolerated and outlines a grievance mechanism for employees to report any potential incidents.

### **Risks of Forced Labour and/or Child Labour being Used and Steps Addressing Risk**

As a Canadian company, La Rocca follows all applicable employment legislation, such as the Ontario Human Rights Code, the *Employment Standards Act*, and the *Occupational Health and Safety Act*. We maintain internal controls to ensure that all our employees are recruited voluntarily and in accordance with all Ontario employment laws and regulations.

The Company is committed to the safety and wellbeing of all its employees, and conducts operations in compliance with applicable laws and regulations. La Rocca’s suppliers are



expected to provide a safe working environment and remain in material compliance with all health and safety laws applicable to the operation and use of their facilities. Like with many food processing and manufacturing businesses, risks in our supply chain arise because of our limited visibility into our own suppliers' supply chains.

### **Measures Taken to Remediate any Forced Labour or Child Labour**

At this time, La Rocca has not identified any specific incidences of forced labour or child labour in its supply chains. Given this, the Company has not yet taken any specific measures to remediate forced labour or child labour in its activities and supply chains as we have not identified any risks in this area.

### **Measures Taken to Remediate Loss of Income to Vulnerable Families**

La Rocca has not identified any instances of loss of income as a result of our efforts to reduce the risk of forced labour or child labour, and so there has not been a basis to take such remedial steps.

### **Training Provided to Employees on Forced Labour and/or Child Labour**

During the 2024 financial year, La Rocca developed its Code of Conduct, which consolidated the Company's existing policies into a comprehensive document outlining. The Code of Conduct combined La Rocca's existing expectations and requirements of employees regarding a safe and fair workplace. The new Code of Conduct specifically articulates the prohibition of forced labour, and every employee must agree to adhere to the Code of Conduct at the time of the onboarding process.

Beyond the Code of Conduct, La Rocca has a number of policies in place to support the overall wellbeing of its workforce. In a commitment to fair employment practices, La Rocca specifies in its policies that it has a zero-tolerance policy for harassment, it ensures equitable pay practices across all salaried roles, and outlines a grievance mechanism for employees and how complaints will be investigated. Employees are also given training on how to implement these policies.

### **Assessing Effectiveness of Remediation Measures**

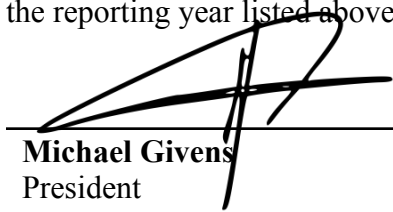


La Rocca is in the process of implementing a number of measures to reduce the risk that forced labour and child labour is used in its activities and supply chains. La Rocca has not taken actions to assess the effectiveness of their actions in preventing and reducing risks of forced labour and/or child labour in its activities and supply chains.

### **Approval and Attestation**

This report was approved pursuant to subparagraph 11(4)(a) of the Act by Board of Directors of La Rocca.

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.



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**Michael Givens**

President

La Rocca Creative Cakes Inc.

Date

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*I have the authority to bind La Rocca Creative Cakes Inc.*