

Forced Labor and Child Labor Report 2024

1. Introduction

This report, prepared by Newly Weds Foods, LLC (“Newly Weds” or “NWF” or the “Company”) for the financial year ending December 31, 2024 (the “Reporting Period”), outlines the measures taken to reduce the risk of forced labor or child labor within our production processes, both in Canada and globally for goods imported into Canada by the Company.

This report is the second report produced by the Company pursuant to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). Newly Weds Foods, LLC is a reporting entity under California’s *Transparency in Supply Chains Act of 2010*.

2. Reporting context

This report is a jointly submitted by Newly Weds Foods, LLC, on behalf of itself and the following two Newly Weds subsidiaries—Newly Weds Foods, Co. and Mullins Food Products—that operate within Canada or import goods into Canada. The terms “Newly Weds Foods”, “NWF”, “Newly Weds”, “we”, “our”, and the “Company” refer to Newly Weds Foods, LLC and extend to all the entities mentioned herein, unless otherwise expressly stated.

3. Structure, activities, and supply chains

Newly Weds Foods, LLC is a company registered in the United States of America and serves as the parent company of the entities detailed in this report. Headquartered in Chicago, Illinois, Newly Weds supplies breadcrumb coatings, batters, seasonings, sauces, and functional ingredients to poultry, seafood, meat, small goods, and pasta processors.

Newly Weds employs approximately 3,000 individuals in the United States with approximately 287 employees based in Canada as of the date of this report. The Company has 14 manufacturing facilities across the United States, as well as three facilities in Alberta, Quebec, and Ontario.

The supply chain team at Newly Weds Foods plays a critical role in supporting our operations across, Canada, the United States, Europe, and Asia-Pacific regions by strategically sourcing products both locally and globally to meet our operational needs while maintaining standards for the quality and safety of raw ingredients. Ingredients are traded from local and international traders and manufacturers and are sourced primarily from the United States and Canada.

4. Policies and due diligence processes

Newly Weds Foods has various policies and due diligence processes in place that embed responsible business conduct and human rights considerations and set out certain values and standards for our employees and suppliers. NWF has implemented policies that underscore its commitment to preventing forced and child labor within its operations and supply chain.

Our child labor and modern slavery policies outline our zero-tolerance approach to child and forced labor in our operations and supply chain, as well as our commitment to complying with applicable laws and regulations related to labor rights. We align our policies with internationally recognized definitions and standards, including the International Labour Organization (ILO) Conventions, the UN Guiding Principles on Business and Human Rights, and the Ethical Trading Initiative’s (ETI) Base Code. For example, NWF uses the ETI’s definition of child labor as a baseline to identify, assess, and prevent any risk of child exploitation. NWF also expects its suppliers to uphold the same standards and to extend similar requirements to their own suppliers. For instance, this

expectation is communicated through our Supplier Expectation Manual. All individuals associated with Newly Weds, including employees, contractors, and suppliers, share the responsibility of preventing, detecting, and reporting instances of child or modern slavery.

In furtherance of Newly Weds' commitment to upholding human rights across its operations, our human rights policy emphasizes our dedication to respecting the rights of individuals within its workforce, communities, and supply chain. This policy also adopts ETI definitions that are founded on the conventions of the ILO. These definitions, along with other internationally recognized standards, are used to identify unacceptable behaviors, or the threat of those behaviors, that are intended to cause, result in, or are likely to result in the harm generated by these practices of human rights violations. The policy also outlines our adherence to the ETI base code, ensuring freedom of employment choice, respect for freedom of association, safe and hygienic working conditions, prohibition of child labor, fair wages, reasonable working hours, and non-discrimination.

In addition, Newly Weds is committed to providing a work environment for all employees that is free from all types of harassment. Under ILO guidelines, harassment and abuse are considered indicators of forced labor, including unreasonable interference, intimidation, hostility, or offensive behavior on the part of others as methods of coercion or control. NWF recognizes and acknowledges that any and all types of such mistreatment and harassment will not be tolerated. Newly Weds has developed policies against harassment as well as reporting procedure for employees who have been subjected to or witnessed harassment to ensure we provide a work environment for all employees that is free from all types of harassment such as unreasonable conduct, unwelcome or hostile behavior, and harassment of a discriminatory nature linked to characteristics protected by applicable laws or regulations. These principles are integrated into NWF's workplace policies, including but not limited to anti-harassment, code of conduct, and human rights policies, as well as orientation and annual internal training materials.

With regard to vulnerable demographics in the workforce—particularly women, migrants, and other marginalized groups—NWF recognizes that overlapping factors can increase the risk of exploitation, and therefore these groups are disproportionately vulnerable to forced and child labor. These may include gender, immigration status, language barriers, economic instability, and lack of access to social support. NWF's policies are designed to account for and respond to this intersectional risk. For instance, Newly Weds' sexual harassment policy maintains strict prohibition against gender-based harassment. Gender-based harassment, particularly when targeted at women or vulnerable gender minorities, can be a coercive tactic used in forced labor environments. NWF strictly prohibits all forms of sexual harassment and abuse, clearly defines what constitutes such behavior, and provides accessible procedures for reporting violations. These protections extend to all individuals, regardless of gender, and reflect our broader goal of ensuring that no employee is subjected to conditions that may contribute to exploitation, abuse, or forced labor.

Regarding other vulnerable groups, a key element embedded throughout these policies includes our commitment to Equal Employment Opportunity (EEO) and non-discrimination through the promotion of a safe and respectful workplace. These policies are accompanied by our strict standards prohibiting harassment, violence, coercion, and abuse—all of which can be drivers or indicators of forced labor, especially among individuals with limited power or visibility in the workplace.

Taken as a whole, these policies define unacceptable behaviors and practices prohibited thereunder. Our policies emphasize that all individuals associated with Newly Weds, including employees, contractors, and suppliers, share the responsibility of preventing, detecting, and reporting instances of forced and child labor. This includes the duty to cooperate with an investigation, duty to be truthful, and duty to immediately report potential

indicators of forced or child labor or other offensive behavior. During the onboarding process, employees are provided training by trained members of the Human Resources Department on harassment and violence protection. Similarly, all employees undergo annual training on a range of ethical topics such as race and equity, diversity and inclusion, handling employee complaints, and communication basics, and how to recognize and respond to potential or actual incidents. The policies are always available upon request through the Human Resources Department. Training material and policies can be made available in an employee's preferred language. Further, candidates who are offered employment at NWF are given employment offer letters containing reasonable and consistent terms and conditions, including but not limited to rights under applicable law.

4.1. Verification of product supply chains

NWF prioritizes partnering with reputable suppliers who operate their businesses in a responsible and legal manner as well as uphold exemplary ethical practices. NWF's Quality Assurance (QA) and Purchasing Departments review and monitor all direct suppliers through an ongoing supplier approval process. This process requires evaluation of the suppliers' manufacturing facilities, sourcing practices, and other business operations to verify that legal risks in the supply chain are addressed.

This verification is conducted internally by NWF, with incorporation of third-party audits. NWF negotiates a Supplier Qualification Agreement with all direct suppliers, incorporating acceptable of NWF's Supplier Expectations Manual. These documents collectively outline the legal terms of the supply relationship and stipulate, *inter alia*, that suppliers:

- Manufacture their products in accordance with all applicable local, federal, state, and provincial laws concerning human trafficking and slavery;
- Implement plans to identify risks of human rights violations including human trafficking and slavery within their supply chain;
- Promptly notify NWF if they suspect or become aware of human rights violations, including human trafficking and slavery in their supply chain; and
- Comply with all applicable fair labor standards, including minimum wage and age laws.

4.2. Internal accountability standards

NWF regularly audits its internal practices to ensure compliance with policies on harassment, discrimination, and workplace conduct. Our Human Resources Department plays a critical role in monitoring workplace conditions, enforcing policies, and addressing any incidents of unethical practices. As part of our internal monitoring efforts, Human Resources conducts regular walk-throughs of the worksite. To encourage open communication, the Human Resources Department also hosts town hall meetings, providing staff and non-staff employees with opportunities to voice any workplace concerns they may have.

Further, NWF's Corporate Human Resources Department conducts audits of Newly Weds Foods to ensure adherence to ethical recruitment practices and compliance with all relevant policies and procedures. In addition to meeting with Human Resources personnel to assess policy enforcement, Corporate Human Resources also engages directly with staff and non-staff employees to ensure the Company is maintaining a safe and respectful workplace. No incidents of forced or child labor were reported at the last audit during the Reporting Period.

Additionally, as part of the Company's commitment to fostering open communication and transparency, the Company has an open-door policy in place designed to encourage dialogue between employees and management. Any employee can request formal meetings or approach managerial personnel to discuss concerns, suggestions, or work-related issues, including Responsible Business Conduct (RBC) issues.

Our code of conduct lays out the Company's commitment to upholding exemplary standards of ethics and integrity across all business activities. It details the standards of behavior expected from all employees in both

their internal affairs related to the Company as well as external interactions with customers, suppliers, competitors, and the communities we operate. Upon joining NWF, all new employees receive a copy of the Code along with a certification they are required to review and sign annually, affirming their understanding of the standards set forth therein.

4.3. Management systems and grievance mechanisms

In line with our commitment to maintain an open-door policy, NWF has various reporting channels in place for employees to express work-related suggestions or report any experienced or witnessed grievances, including concerns regarding harsh or inhumane treatment. Employees are strongly encouraged to initiate communication with their immediate supervisor or manager, a member of the Human Resources Department, or any other recognized management representatives to bring forth any concerns or questions they may have. In the event a concern is not promptly addressed through these channels, employees are further urged to escalate the matter to Corporate Human Resources Department. Reports may also be made through the Company's confidential Whistleblower Hotline or Ethics email. The hotline and email address are available 24/7 and allow employees to report concerns anonymously. Employees are encouraged to use their native or preferred language when making a report. Both the Whistleblower Hotline's number and the Ethics email address are posted conspicuously throughout the facilities. Importantly, we have not received any calls or email messages on either of NWF's confidential reporting channels from any NWF employee, supplier, or member of the public regarding potential or actual instances of child and forced labor during the Reporting Period.

Further, any grievance raised follows our internal grievance procedure. The Human Resources Manager delegates responsibility for the thorough investigation of the grievance to an impartial member of management and a member of the Human Resources Department. This procedure extends to grievance appeal hearings as well. This procedure ensures fairness and aligns with our disciplinary procedures that clearly covers the expectations of workers, how behavior is reviewed, and the escalation processes where needed. This grievance process and various reporting channels are discussed during employee onboarding as well as included in various policies within the copy of the Employee Handbook the employee receives. A copy of the grievance process is also provided to an employee who raises a grievance. The Human Resources Department provides these reporting channels upon hire, provides additional postings of the reporting channels throughout the facility, as well as verbally reminds employees of the grievance process and reporting channels. Individuals who report concerns through any of our designated channels can do so without fear of reprisal in accordance with our policy against retaliation. NWF strictly prohibits any retaliation against any employee who reports a grievance or who participates in a grievance investigation. Any attempts to intimidate such employee will not be tolerated.

Any complaints, investigations, and resolutions are documented thoroughly by the Human Resources Department and kept confidential within the necessary boundaries of the investigation. Any individual engaging in retaliatory behavior will be subject to disciplinary action, which may include termination of employment. NWF's various policies direct employees to contact a supervisor, manager, or a member of the Human Resources department for any suspected retaliation concerns. During the Reporting Period, there were no reports of any experienced or witnessed actual or potential grievances, including concerns regarding forced or child labor, labor practices, or corruption.

4.4. Recruitment process

Our Human Resources Department understands their responsibility to prevent forced and child labor in the process of recruiting new employees. During the hiring process, all potential candidates are required to complete a background check, which in part involves verifying all potential employees by checking their identification.

Candidates who are offered employment at NWF are given employment offer letters containing reasonable and consistent terms and conditions, including but not limited to job duties and responsibilities, compensation details, work hours and schedule, vacation and leave entitlements, employment status, probationary period, and rights under applicable law. The letters also include employee statements confirming that job acceptance was voluntary.

We also carefully select reputable external recruitment agencies that uphold similar ethical commitments and adhere to all applicable labor laws. NWF ensures the recruitment agencies we partner with follow clear screening procedures prior to placing any candidates within the Company, including the verification of the candidate's identity, age, and work.

4.5. Working hours, overtime, and rest periods

We stay informed about local employment standards including regulations related to maximum working hours, rest periods, and overtime compensation. We provide our employees work schedules that clearly define standard working hours and any expected overtime. NWF provides advance notice of schedules and changes to allow employees to plan their time effectively. NWF tracks and monitors employees' working hours through timekeeping tools.

We have also developed and communicated clear policies regarding working hours, overtime, and rest periods. For instance, in NWF Co's Ontario facility, the Ministry of Labour Information Sheet on Hours of Work and Overtime Pay is provided to all newly hired employees as guidance on understanding some of the rights and obligations established under the Employment Standards Act, 2000 (ESA). In addition, such employees are provided an agreement to work excess hours which details the company's operations schedule by department and ESA regulations on working hours, rest periods, and overtime. NWF Co's Ontario location also has a right to disconnect policy in place, underscoring its commitment to safeguarding the physical and psychological health and well-being of its employees.

5. Forced labor and child labor risks

Although NWF's due diligence and monitoring processes have not yielded evidence of forced or child labor within our operations or immediate supply chain, thereby eliminating the need to implement remediation measures, should a potential or actual situation of non-compliance arise, NWF will assess each identified risk based on its likelihood and potential severity. For example, our labor resources and the majority of our vendors are located within Canada in the United States. This structure, along with adherence to the legal, regulatory, market practice frameworks, and labor protections in both countries significantly reduces the risk of forced labor or child labor in our direct operations as well as in our internal operations.

Nevertheless, NWF recognizes that risks may still exist in extended supply chains, particularly in global raw material sourcing. According to the [U.S. Government 2024 List of Goods Produced by Child Labor or Forced Labor](#), certain agricultural and spice ingredients, especially those originating from China, India, Thailand, Indonesia, and Vietnam, may present elevated risk. NWF's core ingredients are flour, starch, flavors, and pepper spice. Ingredients and packaging are sourced primarily from Canada and the United States.

To manage these risks, NWF has implemented a measurable supplier performance program adopted in our Supplier Expectation Manual. This includes document review, issue tracking, and supplier remediation planning when gaps are identified. Supplier acceptability is ultimately based on the completeness of the documentation provided, and suppliers' ability to address any concerns raised during the onboarding and audit process.

NWF also identifies potential forced and child labor risks by:

- Engaging regularly across our businesses to share information on critical human rights issues, particularly where risks are severe and systemic and may require enhanced due diligence; and

- Monitoring media and news information to detect global events that could potentially have an impact on our supply chain.

While the risk of forced and child labor is assessed as low in our own operations, the potential consequences of such practices, should they occur, would include serious reputational, legal, financial, and ethical implications. These risks are carefully monitored through our formal grievance systems, internal audits, and supply chain assessments. In the event of suspected or confirmed forced or child labor, NWF would respond immediately through investigation, stakeholder engagement, and corrective action planning. This includes collecting documentation, speaking with affected individuals and witnesses, and determining appropriate remediation based on the circumstances, up to and including the termination of supplier contracts or employee relationships. While no such grievances have been raised during the Reporting Period, NWF mitigates risks associated with forced and child labor through policy and training measures as well as its formal grievance mechanisms and internal monitoring.

6. Remediation measures

Our various company policies and supplier expectations manual offer various reporting mechanisms for our employees and suppliers to report ethical or legal violations, among other concerns. If a situation of non-compliance is identified, NWF will work to develop and implement a corrective plan to improve and remedy the situation. Since NWF's processes and tools did not yield any evidence of forced labor, child labor, or loss of income to vulnerable families due to measures we have taken to eliminate forced or child labor risks, we did not implement any remediation measures in the 2024 fiscal year.

7. Training

NWF employees involved with supply chain management, particularly those Quality Assurance (QA) and Purchasing Department personnel involved with supplier audits, receive training in awareness, identification, and prevention of human trafficking risks, slavery risks, and other aspects of supplier social responsibility and legal compliance. This training involves internal instruction from experienced personnel, evaluation of regional and product-based risk trends in the industry, and ongoing practice in the field.

All new employees are provided onboarding documentation on our policies. This includes but is not limited to the aforementioned policies. Our Human Resources Department reviews this documentation with new employees during the onboarding process. All NWF employees are also assigned mandatory annual training on ethical topics such as workplace harassment and discrimination, race and equity, diversity and inclusion, handling employee complaints, and communication basics.

8. Assessing effectiveness

Collaboration across the industry is vital in identifying and eliminating forced labor and child labor in the global supply chain. As mentioned, a cornerstone of our supply chain function is to establish a relationship of trust and integrity with external stakeholders. Our supplier selection and onboarding process is comprehensive and includes due diligence, evaluating suppliers' reputation, legal compliance, adherence to health, safety, and environmental standards, and reference checks. We also track and monitor key supplier metrics, including performance history, discrepancies, and non-conformances. In addition, we investigate and track all internal and external reports through our various reporting channels.

While NWF believes in the efficacy of our measures to prevent and mitigate forced labor and child labor within our operations and supply chain, we will strive to continue to identify emerging risks. We intend to continue developing and implementing additional due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labor and child labor in our activities and supply chain.



9. Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(a) of the *Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* by Newly Weds Foods, LLC.

In accordance with the requirements of the *Act*, and in particular subparagraph 11(4)(a) thereof, I, the undersigned, attest that I have reviewed the information contained in this 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.

I attest that I have the authority to bind Newly Weds Foods, LLC and all listed subsidiaries owned by Newly Weds Foods, LLC.

Timothy W. Whelan
Vice President and General Counsel
Date: April 28, 2025