

FORCED LABOUR IN CANADIAN SUPPLY CHAINS

PUBLIC SAFETY CANADA

Niqitaq Fisheries Ltd. Report Submission April 1, 2024 to March 31, 2025

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 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.

Glenn Grandy

CFO

Niqitaq Fisheries Ltd.

Signed:

A handwritten signature in black ink, appearing to read 'Glenn Grandy', written in a cursive style.

May 28, 2024

I have the authority to bind ***Niqitaq Fisheries Ltd***

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Reporting Entity Information

- Legal name: Niqitaq Fisheries Ltd..
- Financial reporting year: April 1, 2024 – March 31, 2025
- Business number: 88457 8600
- Entity categorization: Corporation
- Sector/industry: Seafood Harvester and Distributer
- Location: Head Office – Iqaluit, NU Canada

Section 11 (1):

Steps taken (during the previous financial year) to prevent and reduce risks of forced labour and child labour:

- Broadly or specific? (parts of the entity's activities and supply chains)
- What did they address? (forced labour or child labour)
- Who did they address? (which partners or stakeholders)
- Details of actions taken (policies/processes implemented)

Niqitaq had several policies in place throughout the year which shows our commitment to ethical conduct. These policies include:

- Standards of Conduct
- Violent Free Work Environment
- Harassment Policy
- Human Rights Policy
- Contractor and Sub-Contractor Policy

During the year we have drafted a new Supplier Code of Conduct Policy and a Forced and Child Labour in Supply Chain Policy..

In continuation from the previous year, we remain diligent in sourcing any new suppliers. As our business has not changed, we have not introduced many new suppliers to our supply chain. Any new suppliers will be questioned regarding whether there is a risk of forced and child labour in their supply chains.

During the upcoming year educational workshops will be held with employees on identifying and addressing forced and child labour. Remote employees will be connected via Teams. The onboarding of new suppliers will include a questionnaire regarding their policies on the prevention of forced and child labour in their supply chains.

Niqitaq is a harvester and seller of seafood from northern Canadian waters. Most of our suppliers are service providers for our vessels and are in Canada. We source some of our materials from Western European countries that have stringent policies regarding forced labour.

It should be noted that most of Niqitaq's supply is sourced within Canada or Western Europe. As such, Niqitaq is deemed to be at low risk for any forced/child labour.

Section 11 (3):

- a. Niqitaq structure, activities, and supply chains
- b. Policies and due diligence processes in relation to forced labour and child labour
- c. Parts of operations and supply chains that may carry a risk of forced/child labour being used and steps taken to assess and manage that risk
- d. Measures taken to remediate any forced labour or child labour
- e. Measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in activities and supply chains
- f. Training provided to employees on forced labour and child labour
- g. Assessing effectiveness in ensuring that forced labour and child labour are not being used in operations and supply chains

Requirement (a) – structure, activities, and supply chains

Niqitaq Fisheries Ltd. is a corporation, registered in Canada, and headquartered in Iqaluit NU and an operations office in Paradise NL, Canada.

Niqitaq's mandate is to harvest seafood from northern Canadian waters and sell to customers around the world.

Core functions of the business (fleet operations, sales, finance/accounting, logistics, quality control) are based in the Paradise office.

Niqitaq employs approximately 150 people in Canada.

Niqitaq is a member of the FCC (Fisheries Council of Canada) and NFA (Nunavut Fisheries Association).

Other affiliations & certifications held by Niqitaq:

- Export Certification Control Program required by the Canadian Food Inspection Agency.
- Marine Stewardship Council (MSC) certification for commitment to maintaining a sustainable seafood resource for future generations.

Product sources:

Niqitaq harvests and produces 95% of its own finished products for global sales with the remaining 5% sourced from Danish/Greenlandic companies.

Requirement (b) – Policies and due diligence processes

Niqitaq is committed to only sourcing materials and services from reputable suppliers that have responsible ethical practices implemented. In many cases, Niqitaq employees have visited the suppliers' operations. During these visits to the supplier sites, our employees observe for unsafe working conditions, signs of employee abuse, and child/forced labour. In the case of service providers, the work is completed on our vessels alongside our vessel crew.

Requirement (c) – Forced labour and child labour risks

Niqitaq's own activities/operations:

No risk identified in Niqitaq's direct activities and operations.

Niqitaq supply chains:

Niqitaq's supply chain outside of Canada is mainly in Canada and Western Europe. These countries have legislation and policies to address forced labour/child labour. Niqitaq's supply chain outside of Canada is deemed low risk for forced labour/child labour.

Through Niqitaq's membership in FCC, it is regularly kept informed of issues that impact the seafood industry – including those that may concern child/forced labour.

Requirement (d) – Remediation measures

Not applicable.

Requirement (e) – Remediation of loss of income

Not applicable.

Requirement (f) – Training

While no official training occurred in 2024, Informal training encompassed education of the Act with anyone involved in procurement matters. Formal training sessions will be held in 2025 with employees.

Requirement (g) – Assessing effectiveness

Not applicable.