



2025 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Introduction

This report has been prepared by Old Dutch Foods Limited (**Old Dutch**) pursuant to the requirements under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the **Act**) for our financial year ending December 30, 2024.

Old Dutch promotes labour practices that protect the safety, health, and human rights of workers in our operations and supply chains and is committed to working with our supply chain partners to improve transparency, assess, and prevent the use of forced labour and child labour in our extended supply chains.

Organizational structure, activities, and supply chain

Old Dutch is a privately owned company, operating in Canada since 1954. We manufacture and distribute potato- and corn-based products and snack foods. Our brands include Old Dutch Potato Chips, Old Dutch Puffcorn, Popcorn Twist, Cheese Pleasers, Arriba Tortilla Chips, and Restaurante Chips, Salsa and Dips. We also produce similar products under the Humpty Dumpty label. We also manufacture private label brands for large retailers in Canada and the United States.

Our head office is in Winnipeg, Manitoba. We operate production facilities in Manitoba, Alberta and New Brunswick. We have more than 1600 employees in Canada; the workers in most of our manufacturing facilities are unionized. We sell our products to retailers and wholesalers in Canada and the United States. Our products are delivered by our own trucking operations, independent distributors, Canadian licensed common carriers, or the distribution operations of our large retail customers. As a food manufacturer, we are required to comply with food quality requirements and inspections as required by Health Canada. Our facilities are subject to regular food inspection audits by government regulators and other third parties.

Our supply chain consists of ingredients and packaging, as well as equipment and supplies used in our manufacturing facilities. We have decades-long relationships with our seasoning suppliers, rollstock (snack bag) suppliers, and potato farms.

Old Dutch maintains visibility of our ingredient suppliers to meet food quality standards. Our ingredients are primarily sourced from producers and manufacturers in Canada and the United States. In this reporting year, we continued to import ingredients and supplies from the United States, production equipment and parts from Japan, and ingredients from Belgium and the Netherlands. We also source a minor amount of maintenance supplies and parts to support our manufacturing operations originating from Europe, Australia, Asia, Mexico, and South America.

Steps to prevent and reduce the risks of forced labour and child labour

In this reporting year, Old Dutch took the following steps to prevent and reduce the risks of forced labour or child labour in our operations and supply chain:

- Continuing to comply with applicable food safety and workplace health and safety programs and audit requirements to meet industry and regulatory standards

- Updating our vendor questionnaire to include confirmation of our supplier's compliance with modern slavery legislation and their policies on child labour, forced labour, slavery, and human trafficking
- Sourcing our ingredients, equipment and supplies from reputable suppliers who meet the expectations set out in our Supplier Approval Program
- Encouraging our employees to report any wrongdoing that may have adverse impact on Old Dutch, our customers, employees, or the public
- Training our workers on human rights, health, security, and safety
- Implementing newly developed policies, procedures and training focusing on education, awareness, identification and prevention of forced and child labour

Policies and due diligence processes

Old Dutch embeds responsible business conduct in our governance, policies, and decision-making, which enables us to assess, prevent, and reduce the risks of forced labour and child labour in our activities and supply chain.

Our **Code of Ethical Conduct** guides the actions of our employees, officers, and directors to ensure that they are consistent with our core values of honesty, integrity, diversity, quality, respect, responsibility, and accountability. We conduct business with the highest ethical standards, and we are committed to providing equal opportunity in all our employment and purchasing practices. We require our employees, subcontractors, agents, consultants, and subcontractors, to act consistently with this Code and all applicable laws.

In our operations, Old Dutch has adopted policies and processes to uphold and protect the human rights, safety and health of our workers, including the following:

- As part of our hiring process, we conduct background checks of prospective employees and periodically verify our existing employees, including qualifications, age, employment history and references, in accordance with applicable laws and regulations.
- Our **Employee Conduct & Safety Regulations** set out our commitment to the health and safety of our employees. We ensure that our employees do not carry out their duties in a manner that will endanger their life or safety, or that of others. We require that before new hires begin work, they must read and understand our safety rules and safety regulations.
- Old Dutch is SAFE Work Certified by Made Safe, an organization which, in partnership with SAFE Work Manitoba, provides health and safety services designed specifically for the needs of the manufacturing work environment. We also received a Certificate of Recognition from the Government of Alberta for establishing health and safety programs that meet the standards established under Occupational Health and Safety.
- Our **Contractor Management Policy** sets out our due diligence process to ensure that contractors have received appropriate training and meet all obligations under applicable health and safety laws and regulations. Our contractors are required to submit information about their services and training of their employees to ensure that all appropriate safety trainings are undertaken.
- Our **Health, Safety & Environment Statement of Commitment** is consistent with our health and safety policies, and commits us to protecting the health and welfare of our employees, distributors, outside contractors and any visitors to all our operations.
- Our **Workplace Violence Prevention Policy** establishes zero tolerance towards violence in the workplace. We are committed to providing a safe and healthy work environment free from violence, threats of violence, harassment, intimidation, and disruptive behavior for all our employees. We have a procedure in place for employees to report any violence or potentially violent situation.

- Our **Conflict Resolution Policy** provides our employee with a procedure to raise concerns regarding any conflict in the workplace or dissatisfaction with respect to issues related to their employment. Workers can raise concerns on perceived unfair or inequitable treatment, abuse of power, administration of company policies, and harassment whether sexual, discriminatory, or personal in nature.
- Our **Human Rights Policy** commits to building and preserving an open, inclusive, and healthy working environment. We do not condone or tolerate any act of discrimination or harassment in our workplace. We ensure that no person is discriminated with respect to any aspect of their employment with us, including training, advancement, promotion, conditions of employment, remuneration, or any other benefit or term of employment.
- Our **Whistleblower Policy** encourages our employees to report any wrongdoing that may adversely impact Old Dutch, our customers, employees, or the public at large, without fear of retaliation or a negative impact on their employment status. Our Human Rights Policy also provides for reporting procedures where an employee feels they are being discriminated against or harassed.

In addition to modifying existing policies, in 2024 we added two additional policies directly addressing the dangers of child labour and our commitment to an ethical and socially responsible workplace and supply chain, our Ethical Trade Initiative Policy and Statement on Child and Forced Labour.

Our **Ethical Trade Initiative Policy** pledges our organization to ethical, legal, and socially responsible conduct, as well as ensuring a safe and free working environment. This policy confirms that being socially responsible is a strategic objective of utmost importance for our organization.

Our **Statement on Child and Forced Labour** shows that we are unequivocally committed to preventing any instance of child or forced labour within our institution and resolutely within our supply chain. It confirms our expectations of our suppliers, business partners and contractors to uphold similar standards and commitments to ensure they do not engage in any practice that would allow for child or forced labour.

- Our manufacturing facilities are regularly subject to audits by regulators, including Health Canada Good Manufacturing Practice (GMP) audits, to comply with food safety and quality regulations. These audits include a review of the conditions and health and safety in our facilities.

In our supply chain, Old Dutch has adopted vendor policies and processes to ensure our suppliers meet required regulatory standards and respect the rights of workers in their operations and extended supply chains:

- Our **Supplier Approval Program** is a written document establishing our responsibility, methods, and documentation requirements for selecting, evaluating, approving, and monitoring suppliers. The primary purpose is to ensure we have information on food handling and critical food safety practices of our suppliers, including the conditions and safety of their facilities. Our vendor expectations are set out in this policy, and apply to our foreign manufacturers, supplier of ingredients and materials, and co-packers or contract manufacturers.
- We use a **General Vendor Questionnaire** during the onboarding of our suppliers, which allows us to acquire requisite background information about our suppliers, including their plant location. In 2024, Old Dutch updated this Questionnaire to include inquiries about whether our suppliers comply with modern slavery legislation, and about their policies on child labour, forced labour, slavery, and human trafficking. We make clear to our suppliers that such practices are not tolerated and strictly prohibited by Old Dutch.

- In New Brunswick, we voluntarily participate in a trade and customs assessment program, the Customs Trade Partnership Against Terrorism (CTPAT). As part of this program, we assess risks in our supply chain, identify security gaps, and implement specific security measures and best practices.

Forced labour and child labour risk

Old Dutch is aware that government and international organizations have identified risks in the global food supply chain. Adopting and implementing the safety and supplier management policies and risk management processes described above enables Old Dutch to assess risks and prevent the use of forced labour and child labour in our operations and supply chains.

Our compliance requirements, supplier qualification requirements, and the location of our operations and direct suppliers lower the risk of forced labour and child labour. In addition, the food manufacturing industry is highly regulated in Canada and the United States. Regular external quality inspections are required to ensure consumer safety and confidence. The risk assessments embedded in existing food safety and quality audits enable visibility and transparency over manufacturers and the extended supply chain and include independent review of factors that are relevant to indicators of forced labour and child labour, including sanitary working conditions and qualified workers; and manufacturers are required to map the supply chain to comply with food safety standards.

In this reporting period, we have not identified risks of forced labour and child labour impacting our operations or supply chains. We will continue to assess our policies and processes and engage with our suppliers to prevent and assess the use of forced labour and child labour in our extended supply chains.

Remediation measures and remediation of loss of income

Our Whistleblower Policy and Human Rights Policy encourage the reporting of all wrongdoings and human rights violations in our operations. We do not tolerate any form of retaliation against a complainant or a witness of a workplace wrongdoing.

To date, Old Dutch has not identified or received any report or complaints of risks relating to forced labour or child labour in our operations or supply chain and, accordingly, has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

Employee training

Our policies are communicated to our employees by posting them on notification walls, bulletin boards, and by internal emails. We distribute copies of our Code of Ethical Conduct to our employees and make them aware of the importance and specific requirements of our policies. During the onboarding process of our new hires, they are trained on workplace health and safety. We also provide training to our employees on human rights protection.

As of this reporting year, a training course “Forced and Child Labour: Overview” has begun rollout throughout the organization. This training is specifically designed to bring awareness and education to Old Dutch employees regarding the plight of Forced and Child labour, and what can be done if suspected.

Assessing effectiveness

Beyond applying our existing programs to assess workplace safety in our operations and assess food quality and safety in our supply chains, we have not yet developed programs to assess the effectiveness of our approach to preventing and assessing the risks of forced labour and child labour in our operations and supply chains.

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.

Dated in the City of Winnipeg, Manitoba, this 21st day of May, 2025.

Steven C. Aanenson
Steve Aanenson, President

I have the authority to bind Old Dutch Foods Limited.