

POUND-MAKER INVESTMENTS LTD.

MODERN SLAVERY REPORT

1. INTRODUCTION AND APPLICATION

This joint report (the “**Report**”) is prepared by Pound-Maker Investments Ltd., Pound-Maker Capital Corp. and Pound-Maker Agventures Ltd. (collectively, “**Pound-Maker**”, “**Entity**”, “**we**” or “**our**”) in compliance with the requirements of the Canadian *Fighting Against Forced Labour in Supply Chains Act* (the “**Act**”) with respect to the period from May 1, 2023 to April 30, 2024.

2. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Pound-Maker Agventures Ltd. is a corporation formed under the laws of the Province of Saskatchewan, and is engaged in feeding cattle and producing ethanol in the province of Saskatchewan. Pound-Maker Investments Ltd., is also a corporation formed under the laws of the Province of Saskatchewan and is the parent entity of both Pound-Maker Agventures Ltd. and Pound-Maker Capital Corp.

Pound-Maker’s operations related to feeding cattle involve purchasing cattle from producers and livestock dealers exclusively within Canada. These cattle are fed until they are ready for slaughter. Pound-Maker also purchases feed grains, forages, veterinary products and supplements from suppliers within Canada for its feeding operations. Some forages are produced by Pound-Maker using seed and inputs also purchased within Canada. All cattle are sold within Canada.

Pound-Maker’s operations related to ethanol production involve purchasing grain and process-related production inputs to manufacture ethanol and its distiller’s grain co-products. The grain is typically purchased from producers and brokers within Canada, and occasionally from brokers sourcing in the United States. Other production inputs are purchased from suppliers in Canada or the United States. All ethanol is sold within Canada and all co-products are utilized on-site in cattle feeding operations.

For our Financial Year ended April 30, 2024 the supplies imported into Canada by Pound-Maker represent less than 1% of its total production expenses and are made up of ethanol process-related production inputs which Pound-Maker sources from suppliers located in the United States. All other supplies are either produced in Canada or imported into Canada by another entity. 92% of Pound-Maker’s production expenses for Financial Year ended April 30, 2024 are related to cattle, grain and forage produced in Canada. Another 3% of Pound-Maker’s production expenses for Financial Year ended April 30, 2024 are wages and salaries paid to Canadian-based employees.

3. DUE DILIGENCE PROCESS

Pound-Maker conducts all of its production and manufacturing activities within Canada. Pound-Maker has reviewed its operations and found that the risk of forced labour or child labour in their supply chains is extremely low, which is due to Pound-Maker’s very limited exposure and use of

imported goods. The expectation is that domestic and North American suppliers comply with all employment and health and safety standards and regulations applicable in Canada and/or the jurisdiction in which they operate, which therefore reduces the risks that forced labour or child labour is used in our supply chain. For further due diligence, Pound-Maker reviews reports filed by key suppliers under the Act on an annual basis.

Pound-Maker conducts due diligence to prevent child labour within its own operations by requiring that a social insurance number and photo driver's license be provided at commencement of employment, which allows for confirmation of identity, age and immigration or citizenship status. At this time, there aren't any positions eligible for work permit based employment, mitigating one risk factor for forced labour.

4. POLICIES, GOVERNANCE AND DUE DILIGENCE PROCESSES

Pound-Maker has several policies that outline elements of the work environment we want to maintain. These policies include an anti-harassment policy to ensure behaviour is supportive and conduct is appropriate and free of harassment which emphasizes the responsibility everyone has to prevent and address harassment. A policy that forms a critical component of this is the requirement to report acts of misconduct, with protections for the person reporting as well as consequences for a failure to report. Pound-Maker also adheres to *The Saskatchewan Employment Act* and the province's workplace standards legislation.

Pound-Maker has a Board of Directors with governance oversight. This oversight led to core values and guiding principles that include integrity in business practices as well as supporting communities and leadership in the agriculture industry. We also have complementary corporate ethics guidance that recognizes that people are our greatest asset. It establishes a commitment to provide a safe and healthy work environment and open communication on all matters, as well as delineation of ethical buying practices.

We recognize there is an opportunity to add policies specific to the use of forced labour or child labour in our supply chains, in addition to our internal workplace policies and our reporting obligations under the Act. Pound-Maker will continue to further efforts to mitigate the risk.

5. RISK ASSESSMENT AND MANAGEMENT

We have not started the process of identifying additional parts of our activities and supply chains that carry a risk of forced labour or child labour being used, such as Tier 2 and Tier 3 suppliers.

6. REMEDIATION MEASURES

We have not identified any forced labour or child labour in our activities and supply chains; therefore, we have not taken any measures to remediate or eliminate any forced labour or child labour in our activities and supply chains, nor have we been required to remediate the loss of income to the most vulnerable families that results from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.

7. TRAINING

We do not currently provide training to employees specific to forced labour or child labour. However, we do provide employment orientation at time of hiring, and a review of related policies is part of onboarding of new employees.

8. ASSESSING EFFECTIVENESS

To assess the effectiveness of the policies and procedures to mitigate the risk of forced or child labour in our supply chains, Pound-Maker undertakes the following:

1. On an annual basis, the reporting submitted under the Act by key suppliers is reviewed to identify if there are issues impacting the supply chain of that supplier
2. Review of policies and procedures on an annual basis which includes those related to the Act.
3. Internal incidents arising in a report or claim of misconduct are reviewed and addressed, with changes to related policies made where appropriate to further enhance their effectiveness.

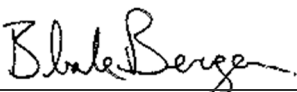
9. APPROVAL AND ATTESTATION

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the board of directors of Pound-Maker Investments Ltd., Pound-Maker Agventures Ltd. and Pound-Maker Capital Corp. for the financial year ended April 30, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, hereby attest that I have reviewed the information contained in this Report for the entity listed above. Based on my knowledge, and having exercised reasonable due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I am providing this attestation in my capacity as a director of Pound-Maker Investments Ltd., and not in my personal capacity.

POUND-MAKER INVESTMENTS LTD.

Per:  _____

Name: Blake Bergen

President

April 24, 2025

I am providing this attestation in my capacity as a director of Pound-Maker Agventures Ltd., and not in my personal capacity.

POUND-MAKER AGVENTURES LTD.

Per: Blake Bergen

Name: Blake Bergen

Chair

April 24, 2025

I am providing this attestation in my capacity as a director of Pound-Maker Capital Corp., and not in my personal capacity.

POUND-MAKER CAPITAL CORP.

Per: Blake Bergen

Name: Blake Bergen

Chair

April 24, 2025