

	Forced Labour and Child Labour In Supply Chain Act	Version #0.0
		Reviewed Last By: Date:
		Reason for Revision:
Issued By: James Vilardi	Issued Date: 20-May-2025	
Approved By: Lou Macera	Approved Date: 23-May-2025	Revision Date:

PURPOSE:

To establish Primo Foods Inc. as a company committed to ensuring all workers hired are legally permitted to work for our company, of appropriate age as required by law, and are working at our company of their own free will. This policy is written in compliance with Bill S-211, an act to enact the Fighting against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, as well as any and all application laws regulations related to Forced Labour and Child Labour.

SCOPE:

This policy applies equally to all employees of Primo Foods Inc.

DEFINITIONS:

Child Labour: means labour or services provided or offered to be provided by persons under the age of 18 years and that:

- (a) Are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- (b) Are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- (c) Interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to combine school attendance with excessively long and heavy work: or
- (d) Constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999 (travail des enfants)

Forced Labour: means labour or service provided or offered to be provided by a person under circumstances that:

- (a) Could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatening if they failed to provide or offered to provide the labour or service; or
- (b) Constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930 (travail force)

<https://www.parl.ca/DocumentViewer/en/44-1/bill/S-211/royal-assent>

FORCED LABOUR POLICY:

- All employees that apply to and work for Primo Foods are hired following a process of application of their own free will.
- Workers maintain control of all personal possessions and documentation including but not limited to legal documents, passports, licenses and visas.
- There is no deduction from any worker's pay or retention of original documentation or property related to recruiting fees or otherwise, compelling workers to remain employed by the company.
- Supervisors, managers and company owners are prohibited from intimidation, discrimination, psychologically abuse or tactics, physical abuse or tactics, and cannot force a worker to remain at work or employed by the company.
- All wages, deductions, loans and/or pay advances are disclosed and agreed upon with the worker in writing, and are in compliance with the Canadian and Ontario Laws. Terms of loans or pay advance repayments will be managed in a manner that does not bound the worker to the employer.
- Bonded Labour and Prison Labour is prohibited at the company
- The company will verify upon hiring that each person hired is legally allowed to work for the company, and has not been subject to slavery or human trafficking.

- If slavery or human trafficking has been suspected the company will call the local authorities to ensure an investigation may be conducted, and the person receives the assistance required to ensure their safety.

CHILD LABOUR POLICY:

- No person under the age of 18 shall be hired for full –time employment. Full-Time employment will be compensated in accordance with Ontario Employments Standards, and trained in accordance with the Occupational Health and Safety Act, R.S.O 1990
- Employees are required to provide proof of working eligibility such as a SIN number for payroll purposes, a working VISA proof of status, Photo Identification, and/or any other verification as requested at the discretion of the company. Employees must register appropriately in order to gain employment with the company listed in the scope of the policy.
- If Child Labour is found within the workforce, intervention and investigative measures will be conducted immediately, and the company will seek resolution in the best interest of the child. The appropriate Authorities will be contacted, and corrective action following the investigation and the root cause analysis of the event will apply. All measures taken will be documented.
- Corrective actions include but are not limited to:
 - Ensuring the child discontinues work
 - Verifying age, home and family
 - Ensuring child is reunited with family and / or relatives / community if this is a safe option
 - The development and implementation of a remediation plan considering the needs and desires of the child and their family
 - Ensuring the child has monetary provisions equal to their current wage, or legal minimum requirement for employment, whichever is higher, up until a date when they are no longer a child
 - Provide support through access to education, connection to an organization to offer counselling, health services or any other necessary services to ensure the welfare of the child

- Explanation of the legal requirements and restriction on working ages of children and assurance, if they wish, they are reemployed when they reach age, if applicable.
- Ensuring that no child found working at Primo Foods Inc. or its affiliated company will be disrespected, discriminated against, or threatened during the process of remediation.

These protocols are implemented completely, and monitored by management for the company listed in the scope of this policy.

CONCLUSION:

Primo Foods Inc. strive to adhere to all applicable governing laws, in order to ensure that our companies follow strong ethical business and social practices.

RESPONSIBILITY:

Company Owners, Human Resources Director, Senior Management, Health and Safety Department

FREQUENCY:

This policy is reviewed annually unless otherwise necessary.

Approval and Attestation

This approval and Attestation apply to the following entities:

Primo Foods Inc.
1532 County Road 34
Ruthven, Ontario
N0P2G0

Reporting Year: **2025**

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.

Lou Macera
Name (Print)

HR Manager
Job Title

May 23, 2025
Date

Lou Macera

Signature – I have the authority to bind Sun-Brite Foods Inc. for the purpose of this attestation

REVISION HISTORY:

Dates Revised	Revision Made	Reason	By