

**Rich Products of Canada Ltd.**  
**Modern Slavery Statement – Reporting Year 2025**

**About Rich Products of Canada Ltd.**

Rich Products of Canada Ltd. is part of a family-owned food company founded in 1945. We are a leader in the frozen food industry, servicing retail, in store bakery, and foodservice channels. More information can be found at [www.richs.com](http://www.richs.com)

**Group Statement and Structure**

Rich Products of Canada Ltd. is a privately held Canadian limited corporation headquartered in Ontario, Canada. It consists of a manufacturing facility in Ft. Erie, Ontario, and a corporate office in Woodbridge, Ontario.

Rich Products of Canada Ltd. is part of a larger corporate structure including, but not limited to, Rich Products Corporation, a Delaware, USA corporation (collectively, “Rich’s”). Rich’s operates in over 20 countries and has over 13,000 associates worldwide. In addition, Rich’s maintains a prominent supply chain where we source products, raw materials, packaging, and other goods/services from partners and suppliers around the globe.

The following commitment and statement on Modern Slavery is a group statement, pertaining to Rich’s multiple global subsidiaries.

**Human Rights Statement and Commitment**

As set forth in our [Global Human Rights Policy](#), Rich’s is dedicated to respecting the rights of our associates and to providing a safe and inclusive work environment. We are committed to conducting our global operations ethically and with respect for the dignity of all people in our supply chain. All of our business partners are expected to uphold this commitment to respect human rights and to adhere to our [Supplier Code of Conduct](#). Rich’s Global Procurement monitors the compliance of our business partners as part of our due diligence process of identification, mitigation, and remediation. In addition, we are committed to hearing and addressing all complaints related to our global operations. Our [Code of Responsible Business Practices](#) applies to all associates and highlights our commitment to the Rich Promise – to do what’s right no matter what. We developed the [Global Ethics Hotline](#), a confidential reporting system that is available to all associates, to facilitate the receipt and handling of complaints regarding suspected violations of company policy or applicable laws. Complaints can be filed anonymously and we have a strict [anti-retaliation policy](#) in place. Additional policies and procedures may also be available at the subsidiary level to further support and define any unique customer or business requirements beyond what is covered in our corporate codes. Rich’s policies and codes are monitored and updated with regular frequency.

Rich’s maintains a zero-tolerance stance on any form of human rights abuse, unlawful discrimination, or exploitation. This includes, but is not limited to, human trafficking and modern slavery, [child labor](#), dangerous working conditions, and other salient issues.

### **Due Diligence, Risk Assessment, & Mitigation**

Rich's Global Compliance program applies rigorous due diligence to identify and/or prevent human rights issues from entering our supply chain, as well as remediates any issue that may have been identified.

Concerns are formally reviewed and investigated by dedicated ethics and human resource representatives, at both the local and corporate level.

Rich's Responsible Sourcing program is specific to suppliers and business partners around the globe. It starts with the [Supplier Code of Conduct](#), which is distributed to all suppliers globally to ensure Rich's expectations are communicated. Prospective supplier partners must complete registration on Ariba and acknowledge acceptance of our Supplier Code of Conduct as a prerequisite for being awarded any business. As new supplier partners enter Rich's supply chain, they undergo a risk assessment, which takes into consideration the brand, product, the production activity that occurs, and the country in which production occurs. Results of this assessment may initiate a prequalification audit as part of due diligence, as well as, or in addition to, a self-assessment using EcoVadis.

Due to the nature of the store brand business, Rich's is also subject to various ethical trade requirements from retailer customers. Customer standards also prohibit illegal and unethical activities, such as modern slavery, with many requiring additional audits.

Rich's has identified three areas considered higher risk for potential labor abuses in our supply chain; the sourcing of palm oil, cocoa, and seafood. To mitigate risks associated with palm oil, Rich's has maintained our Roundtable on Sustainable Palm Oil (RSPO) Certification since 2015. Through RSPO certification, Rich's ensures traceability of sustainably sourced palm oil, significantly reducing the risk of labor abuses in our supply chain and in palm harvesting communities. Similarly, to mitigate risks associated with cocoa, Rich's launched our Rainforest Alliance (RA) certification program in 2024. Additionally, Rich's has had a long-term commitment to sourcing seafood raw materials responsibly starting in 2014. As part of our commitment, we adhere to rigorous standards that define the highest quality levels of sustainability certification for our wild and aquatic raised seafood. We source under the Marine Stewardship Council (MSC), GAA Best Aquaculture Practices (BAP), along with supporting several Fishery Improvement Projects (FIP).

### **Remediation**

Rich's has not detected indicators of forced or child labor in our supply chain, and therefore has not had to perform any direct remediation. However, we expect and work with all our business partners to remediate any issues that do not meet our [Supplier Code of Conduct](#) when discovered through our monitoring processes.

### **Training**

All associates receive mandatory training on Rich's [Code of Responsible Business Practices](#) - including how to use the third-party ethics hotline - and any other pertinent ethical or human resource policy at the start of employment, and on a regular pre-determined frequency throughout their employment. Training is generally documented in an electronic Learning Management System, which helps ensure no associate is overlooked. To reinforce our expectations against modern slavery and other human rights violations, relevant procurement associates and supplier employees are provided additional training through the EcoVadis Academy.

### **2025 Supply Chain Program Update**

To measure environmental social and governance (ESG) risks in the supply chain and drive meaningful change, Rich's chose to partner with EcoVadis to conduct risk assessments starting in 2024. Suppliers are

selected for an EcoVadis assessment, based on the brand, product, the production activity that occurs, the country in which production occurs, purchasing spend to Rich's and/or their ESG risk level. Rich's has conducted more than 140 assessments, along with several third-party ethical/social audits covering our contract manufacturing and seafood suppliers in 2025. Sedex/SMETA continued to be our most frequent and preferred audit protocol.

A variety of non-conformances continued to be identified during these assessments & audits, primarily in the area of Health, Safety, & Material Handling. No violations were found indicating modern slavery, child labor, or a related business critical finding. When non-conformances were identified demonstrating a supplier or site was not meeting Rich's [Supplier Code of Conduct](#), corrective actions were put in place to remediate.

Rich's Procurement team continues to engage with suppliers via EcoVadis and will continue to increase the number of linked suppliers in the system year over year. EcoVadis supports Rich's in ensuring supply chain due diligence, identifying risks and implementing Corrective Action Plans. Rich's Supplier ESG Risk Evaluation Framework:

- If a supplier scores above 45 points, they must complete an EcoVadis reassessment within three years.
- If a supplier scores between 25 and 44, they must work on their Corrective Action Plan and complete an EcoVadis reassessment within two years.
- If a supplier scores below 25, they must work on their Corrective Action Plan and complete an EcoVadis reassessment within one year. If the company perceives a particularly high risk related to a supplier, they may also be required to do an on-site audit.

This statement is made pursuant to relevant legal requirements within the United States, Section 54(1) of the U.K. Modern Slavery Act 2015, Section 13 of the Australian Modern Slavery Act 2018, and Section 11(4)(a) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, which constitutes Rich's slavery and human trafficking statement for the financial year ending 2025.



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