



Joint Statement on Forced and Child Labour in the Supply Chain

This Statement has been prepared in response to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (formerly Bill S-211) and the United Kingdom’s *Modern Slavery Act 2015*. These laws aim to increase transparency, strengthen industry accountability, and drive meaningful action against modern slavery practices. For the purposes of this Statement, “Snackruptors Inc.” and “Snackruptors” are used interchangeably and refer collectively to Snackruptors Inc. and its global subsidiaries, including Fairway GB.

Snackruptors Inc.

Modern Slavery Statement

Financial Year Ending March 31, 2024



Approval and Attestation

In accordance with the requirements of the Act, and specifically section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. To the best of my knowledge, and having exercised reasonable diligence, I confirm that the information provided is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year referenced.

Signed on behalf of Snackraptors Inc.

Full name: Rick Taborda

Title: CEO

I have authority to bind the Snackraptors Inc. and Fairway GB.



Introduction

Snackruptors Inc. is fully committed to identifying, preventing, and addressing all forms of modern slavery, including forced labour, child labour, and human trafficking, within our operations and supply chain. This statement is prepared in accordance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) and reflects the actions we have taken during the financial year ending March 31, 2024 to mitigate these risks.

Our commitment is supported by senior leadership and teams across compliance, human resources, procurement, and operations.

About Snackruptors Inc.

A Canadian-based manufacturer of premium baked goods and snack products. Our headquarters and main production facilities are located in Cambridge, Ontario, where we manage the full product lifecycle—from sourcing ingredients globally to delivering products to retail and foodservice customers across North America.

We are an innovative company with a diverse product portfolio including crackers, baked snacks, and private label products developed alongside our retail partners. Our people-first approach emphasizes employee well-being through standardized processes and compliance with Good Manufacturing Practices.

We continuously invest in research and development to innovate and adapt to evolving consumer tastes, with a vision to be a leader in the snack food industry both in Canada and internationally.



Core Values

TEAMWORK Focus on the “we” not the “me”.

HONEST We believe honesty is the best policy.

REALIABILITY Be someone others can count on.

ENERGY Be balanced, be energized.

ACTION Errors of action are better than errors of inaction.

DRIVE Own it, believe it, be it.

SCOPE Don't try to boil the ocean.

INTEGRITY Do what you said you would.

SELF-IMPROVEMENT There is always room for improvement.

Leadership and Governance

Our operations and ethical sourcing programs include internal oversight of suppliers, ensuring proper onboarding and compliance with modern slavery prevention standards.

Human resources functions, led by our HR Director, play a key role in enforcing labour standards, overseeing recruitment practices, and ensuring employee rights are protected throughout our operations.

Together, these leaders collaborate closely to uphold our Responsible Sourcing Policy, align with industry best practices, and maintain compliance with the Act.

Business Structure and Operations

We are a privately held Canadian company specializing in the production and innovation of snack products, with a particular focus on high-quality, affordable crackers.

We operate a vertically integrated business model that includes product development, manufacturing, quality assurance, and customer service. Our primary manufacturing facility is located in Cambridge, Ontario, where we produce a wide variety of cracker-based snacks sold under our customers' brands in Canada, the United States, and the United Kingdom.

Our operations emphasize teamwork, employee engagement, and continuous improvement. We actively involve our teams in early product development through sensory



evaluations and feedback sessions. We are committed to maintaining the highest standards of food safety and compliance, adhering to Good Manufacturing Practices, food safety regulations, and food defense protocols. Maintaining accurate documentation for nutritional information, product specifications, and regulatory changes is central to how we serve our partners and uphold trust.

Audit Readiness

We operate with a continuous audit-ready mindset across all locations. Our documentation—ranging from workforce records, payroll and timekeeping data, training logs, supplier agreements, and compliance checklists—is maintained to ensure immediate availability for both scheduled and unannounced audits. We routinely review and update our internal procedures to align with current legal, ethical, and food safety requirements. Our teams are trained to support external audits with transparency and accuracy, reinforcing our commitment to accountability and responsible business conduct.

Policies and Risk Management

Policy Framework

We maintain a robust policy framework to uphold ethical sourcing and prevent all forms of modern slavery within our operations and supply chain. Our core policies include the Code of Ethics, which sets fundamental principles for employee behavior; the Supplier Code of Conduct, which outlines mandatory labour and human rights standards for suppliers; the Responsible Sourcing Policy, detailing how we select and manage suppliers to ensure compliance; and a comprehensive Grievance Policy, which provides a mechanism for confidential reporting of concerns. These policies are reviewed at least annually to ensure they remain current with evolving legal requirements and best practices, and are communicated clearly to all stakeholders.



Supplier Compliance and Contractual Obligations

All suppliers engaged by Snackraptors are required to formally commit to our Supplier Code of Conduct before commencing business. This includes adherence to anti-forced labour and child labour clauses embedded within contractual agreements. We specifically focus on high-risk geographies and sectors, requiring suppliers in these areas to undergo enhanced due diligence, including completion of a Self-Assessment Questionnaire (SAQ), submission of third-party ethical certifications, or participation in on-site audits. Suppliers' compliance is continuously monitored, and failure to meet our standards may result in contract termination.



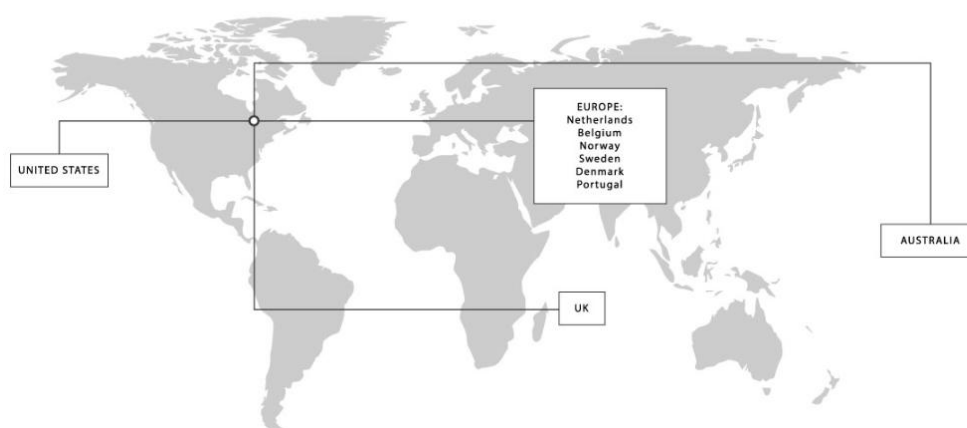
Risk Assessment Process

Our risk assessment methodology considers multiple risk indicators such as the geopolitical risk of the supplier's country, the labour intensity and complexity of goods and services procured, historical supplier compliance records, and recruitment practices that might expose workers to exploitation. This process is led by our Regulatory and Compliance and Human Resources teams who collaborate to analyze and prioritize risks. Identified risks trigger tailored mitigation actions, such as increased monitoring, supplier training, or enhanced contractual safeguards.



Trusted Around the Globe

in multiple customers & product segment



Supplier Onboarding and Due Diligence

Supplier Code of Conduct and Validation

Our Supplier Code of Conduct requires suppliers to affirm their commitment to human rights and ethical labour practices, specifically prohibiting forced labour and child labour. This commitment is validated through a formal sign-off process during onboarding, overseen by our Regulatory and Compliance, Supply Chain and HR team who maintain oversight to ensure consistency and accuracy in supplier compliance documentation.

Supply Chain Mapping and Screening

We undertake detailed supply chain mapping exercises to gain full visibility of our direct and indirect suppliers. This involves assessing worker recruitment practices, subcontractor relationships, and internal controls to detect vulnerabilities. We prioritize mapping efforts in sectors and regions identified as high-risk for modern slavery to prevent exposure in our supply chain.



Auditing and Third-Party Verification

In addition to internal supplier monitoring, we engage independent third-party auditors to conduct ethical audits where required. These audits evaluate working conditions, labour practices, and compliance with relevant laws and our policies. Audit outcomes inform supplier risk profiles and help identify areas for improvement or corrective action.

Training and Internal Engagement

Targeted Modern Slavery Awareness Training

In 2024, Snackruptors implemented a targeted modern slavery awareness training program focused on employees in critical roles—procurement, human resources, warehouse operations, and compliance. This program is designed to enhance employees' ability to identify risk indicators, apply prevention measures, and understand reporting protocols. Training content is updated regularly to incorporate emerging risks and legislative changes.

Integration into Onboarding

Modern slavery prevention training is integrated into the onboarding process for new employees occupying key roles, ensuring early and consistent awareness of our ethical standards and reporting mechanisms.

Supplier Training Initiatives

We recognize the importance of supplier engagement in mitigating modern slavery risks. Consequently, beginning in 2025, we will extend tailored training sessions to selected key suppliers to strengthen their capacity to identify and manage risks in their own operations and supply chains.



Reporting, Grievance Mechanisms, and Remediation

Accessible Grievance Channels

Snackraptors has established confidential and accessible grievance channels enabling employees, suppliers, and other stakeholders to report concerns related to forced labour, child labour, or any ethical breaches without fear of retaliation. These channels include anonymous reporting options, clear escalation paths, and dedicated personnel responsible for managing reports.

Incident Response and Investigation

Though we have not identified any confirmed cases of modern slavery to date, our incident response framework is designed to act swiftly and effectively should concerns arise. This includes thorough site-level investigations, direct engagement with implicated suppliers, and collaboration with external experts for remediation.

Remediation and Corrective Actions

Our remediation strategy emphasizes protecting affected individuals, providing fair compensation where applicable, and ensuring the restoration of their rights. We reserve the right to terminate supplier contracts if compliance issues cannot be resolved and to pursue legal action if necessary. Continuous improvement is a key priority in all remediation efforts.

Performance Monitoring and Future Plans

Monitoring and Evaluation

We systematically track key performance indicators such as supplier compliance rates, percentage completion of mandatory training by employees, audit findings, and grievance reports to evaluate the effectiveness of our modern slavery prevention program. Data is reviewed regularly by senior leadership to inform strategic decisions.



Strategic Development for 2025 and Beyond

Looking ahead, we plan to enhance supply chain transparency by expanding mapping efforts to include Tier 2 suppliers, especially in high-risk regions. We aim to increase supplier participation in ethical sourcing initiatives and forums, fostering collaboration and shared accountability. Our ongoing objectives include strengthening risk management processes, improving training outreach, and continually adapting policies to address emerging challenges.