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## **Introduction**

At Sturgeon Valley Fertilizers, we uphold our values of honesty and integrity in our day-to-day operations. We have a strong commitment to providing high quality products and services to our customers.

While we have not identified any risks of modern slavery in our operations and supply chain historically, we recognize the importance of eradicating child labour and forced labour worldwide. In compliance with Section 11 of Bill S-211, this report, prepared by Sturgeon Valley Fertilizers Ltd. provides an overview of the initiatives we have taken to identify risks of modern slavery, and those we plan to implement as further preventative measures going forward.

## **Section A: Legal and Organizational Structure**

Sturgeon Valley Fertilizers Ltd. ("SVF" or "we") is a privately held, family operated company that offers agronomy field services and distributes fertilizer, seed, and crop protection products. We operate from two locations: one in St. Albert, Alberta and the other in Legal, Alberta. Our skilled team is divided into several functions including Plant Operations, Finance, HR, Packaging, and Retail.

SVF purchases its products almost exclusively from local suppliers in Canada. We work with our supplier partners to deliver high quality products to our customers.

## **Section B: Policies and Due Diligence Processes**

We have not encountered any risks of child labour or forced labour within our operations or supply chains to date. We ensure that our business activities are lawful and abide by Alberta's Employment Standards Code. We work almost exclusively with local suppliers for agricultural products in Canada, with a minimal percentage of our purchases being from suppliers in the United States. We therefore believe that the risk of modern slavery within our activities and supply chain is very low. As a result, we have not formally implemented any policies or due diligence processes related to the mitigation of child labour and forced labour over the last fiscal year. However, we place great importance on operating responsibly and ethically, and will mindfully evolve our policies and due diligence processes in the case our risk profile changes in the future.



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### **Section C: Forced Labour and Child Labour Risks**

For our operations over the last financial year, we have conducted a risk assessment to identify parts of our activities and supply chains that carry a risk of modern slavery being used. We evaluated our supplier spend against the Walk Free Global Slavery Index to identify any geographical risks based on where our suppliers are located and where products purchased originate from. We have also compared our purchases against the US Department of Labor List of Goods Produced by Child Labor or Forced Labor to identify any product-related risks.

Canada, where almost all our products originate from, demonstrates a low prevalence of modern slavery and has low population engaged in modern slavery based on the Walk Free Global Slavery Index. We also did not identify any product risks based on the US Department of Labor List of Goods Produced by Child Labor or Forced Labor.

As a result, we believe that the risk of modern slavery in our activities or supply chains is very low.

### **Section D: Remediation Measures**

We have not identified any instances of forced labour or child labour being used within and prior to our last financial year, and therefore we have not had to take remediation measures to date. In the case that we identify any signs of modern slavery within our business dealings in the future, we commit to taking the appropriate remediation measures in a timely and thoughtful manner.

### **Section E: Remediation of Loss of Income**

We have not identified any instances of forced labour or child labour being used within and prior to our last financial year, and therefore have not had to take remediation measures to date. In the case that any risks of modern slavery arise in our activities and supply chains in the future, we will take the appropriate measures to remediate loss of income for vulnerable families. We remain committed to positively impacting our global community.

### **Section F: Training**

Over the last financial year, we have not provided any training related to forced labour or child labour, as we have assessed the risks of modern slavery in our operations to be very low. Should our risk profile change in the future, we will evolve our training requirements for employees.



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### Section G: Assessing Effectiveness

Over the last financial year, as we have evaluated the risk of modern slavery in our operations and supply chains to be very low, we have not formally assessed our effectiveness in ensuring that forced labour and child labour are not being used in our activities and supply chains. We will continue to reflect on our risk profile and should the risk of modern slavery being used in our activities and supply chains increase in the future, we will implement the appropriate mitigation initiatives and measures to assess the effectiveness of those initiatives.

### Conclusion

We place great importance in upholding the highest standards of ethical conduct and compliance with Bill S-211. While the risk of child labour and forced labour being used in our activities and supply chains is very low, we strive to continuously monitor these risks and provide transparency, adapting our risk mitigation processes where appropriate in the case our risk profile evolves in the future.

### 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 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.

Doug Laird  
Full name

CEO  
Title

May 26, 2025  
Date

[Signature]  
Signature

I have the authority to bind Sturgeon Valley Fertilizers Ltd.

