

ENTITY'S LEGAL NAME: TFI FOODS LTD.
FINANCIAL REPORTING YEAR: 2024/06/01- 2025/05/31
BUSINESS NUMBER: 89552 5897
ONTARIO CORPORATION NUMBER: 1182498
CORPORATION LOCATION: TORONTO, ONTARIO
ENTITY CATEGORIZATION: FOOD IMPORTER

Report for Compliance with Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act

a. Structure, Activities and Supply chains

TFI Foods Ltd. builds a vast network of trusted suppliers, processors and business partners globally. We imports goods include Fish/seafood, Frozen and processed fruit or vegetable, Dairy products, Grain based products and other (value-added) products. Our supply chain involves direct and indirect suppliers who provide raw materials, packaging, and services necessary for the production of our goods. We source materials from various countries, such as China, Thailand, Indonesia, Japan, etc.

b. Policies and Due Diligence Processes

We have implemented comprehensive policies aimed at preventing forced labour and child labour within our supply chain.

Our due diligence process involves the following steps:

- Embedding Responsible Business Conduct: Integrating our anti-forced labour and child labour policies into management systems.
- Identifying and Assessing Adverse Impacts: Conducting regular risk assessments across our operations and supply chains.
- Ceasing, Preventing, or Mitigating Adverse Impacts: Implementing corrective actions where risks are identified.
- Tracking Implementation and Results: Monitoring the effectiveness of implemented measures.
- Communicating How Impacts Are Addressed: Regularly reporting to stakeholders about our efforts and outcomes.
- Providing for or Cooperating in Remediation: Ensuring proper remediation measures are in place and accessible.

The details of steps taken to prevent and reduce risks of forced labour and child labour are indicated in sections (c).



c. Forced Labour and Child Labour Risks

The followings are the steps have taken to identify, assess and manage forced labour or child labour risks in the entire supply chains.

1. Selection of suppliers

- Conduct comprehensive mapping of our entire supply chain to identify high-risk areas. Management / Purchaser/ Designee are responsible for identifying potential suppliers through market research, referrals, or industry contacts.
- Focus on regions and sectors known for higher incidences of forced labour and child labour.
- The new suppliers would be selected by considering factors such as supplier reputation, history of labor violations, and transparency in supply chain practices.
- The suppliers with history of labor violations will be placed on our alert list, and will not be selected.
- A supplier evaluation document* is prepared and provided to the new supplier for completion.
- Once the evaluation document is completed by the new supplier; the receiver forwards the document to QA for evaluation.

* Refer to “Annex 1- Supplier Evaluation Document”

2. Evaluation of suppliers

- Evaluation of new oversea suppliers consists of reviewing the supplier evaluation document* to make sure it is complete, valid and current. The assessment is conducted by QA/ Designee.
- The local suppliers are under the supervision of Canada’s institution and must comply with the regulations of Canada’s Bill S-211. Therefore, the local suppliers are not required to complete the supplier evaluation document*.
- By reviewing the evaluation document, the QA / Designee can confirm the following:
 - Supplier’s awareness and understanding of the provisions outlined in Bill S-211.
 - Supplier’s assurance of outlining procedures and implementing measures to prevent forced labor and child labor across the entire supply chain.
 - Supplier’s commitment of providing additional information or documentation to demonstrate compliance with Bill S-211.

* Refer to “Annex 1- Supplier Evaluation Document”

3. Approval of suppliers

- Upon receiving; the QA/ Designee assess the supplier evaluation document*
- Once the evaluation document is confirmed as complete, valid and current; the new supplier is added to the Approved Suppliers List, and then Management / Purchaser / Designee are notified, so they purchase from this new supplier

* Refer to “Annex 1- Supplier Evaluation Document”



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4. Monitoring of suppliers

- Suppliers are monitored to ensure that they continue to meet the approval requirements.
 - Suppliers' evaluation document will be ensured to remain complete, valid and current.
 - 3rd party audit reports, for example SMETA (Sedex Members Ethical Trade Audit Report) and Amfori audit reports
 - The document will be renewed yearly to ensure suppliers' continued adherence to labor standards.
- Establish clear communication channels with suppliers to address any issues or concerns related to labor standards promptly.
- If necessary, suppliers will be asked to provide additional information or documentation to demonstrate their commitment to eradicating forced labor and child labor.
- Perform immediate audits of suppliers identified as high-risk.

5. Corrective Actions

- Develop corrective action plans for suppliers found to be using forced labour or child labour.
- Require non-compliant suppliers to implement corrective measures within a specified timeframe.
- Provide support and resources to help suppliers comply with our standards
- Terminate contracts with suppliers who fail to comply with corrective action plans or show unwillingness to improve. And the non-compliant suppliers will be reported to Public Safe Canada.

Annex 1 Supplier Evaluation Document
Letter of Guarantee - Compliance with Bill S-211

Date:

Dear TFI Foods Ltd.,

Re: [Supplier's Company Name] Letter of Guarantee - Compliance with Canada's Bill S-211

We, [Supplier's Company Name], hereby provide our assurance and guarantee of compliance with Canada's Bill S-211, known as the act in Canada to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act, in relation to our products supplied to your company.

As a responsible supplier, we understand the importance of ethical sourcing and are fully committed to upholding human rights standards in both policies and processes operations as well as the full supply chain.

In accordance with Canada's Bill S-211, we hereby confirm the following:

1. We are aware of and fully understand the provisions outlined in Canada's Bill S-211.
2. We have implemented measures to prevent forced labor and child labor across the entire supply chain, including production, packaging, and raw material sourcing, etc.
3. We maintain documentation outlining the steps taken to ensure compliance with Canada's Bill S-211 throughout the entire supply chain.
4. We are dedicated to providing any additional information or documentation necessary to demonstrate our commitment to eradicating forced labor and child labor.

[Supplier's Company Name] assure that our products are produced and supplied in accordance with the highest ethical standards, and comply with Canada's Bill S-211, an act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act. We are committed to maintaining this integrity in our business practices. If you have any further questions, please feel free to contact us at [email address/phone].

Sincerely,

[Name]

[Job Position]

[Signature]

d. Measures taken to remediate any forced labour or child labour

Our company have assessed that our activities and supply chains do not carry a risk of forced labour or child labour being used. There are no measures have been taken to remediate forced labour or child labour in our activities and supply chains.

e. Measures taken to remediate the loss of income

Our company has judged that vulnerable families have not experienced loss of income as a result of steps we taken to eliminate forced labour or child labour risks. Hence, there are no measures have been taken to remediate loss of income for vulnerable families in our activities and supply chains.

f. Tranining

We provide comprehensive training for our employees on identifying and managing forced labour and child labour risks. This include:

- **Mandatory training:** For the procurement department and the QA department, including senior management.
- **Content Coverage:**
 - The training ensures the employees are aware of and fully understand the provisions outlined in Canada's Bill S-211.
 - Training for the procurement department covers risk identification techniques like market research, and response procedures if forced labour and child labour risks are identified.
 - Training for QA department ensures their comprehension of company's measures/ policies to prevent forced labour and child labour within the entire supply chain. And, ensure they are able to evaluate and monitor the supplier to prevent and reduce risks of forced labour and child labour.

g. Assessing Effectiveness

- Keep tracking relevant performance indicators, such as numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and child labour clauses
- Suppliers are monitored and reviewed to ensure that they continue to meet the approval requirements.
 - Suppliers' evaluation document will be ensured to remain complete, valid and current.
 - The document will be renewed yearly to ensure suppliers' continued adherence to labor standards.
- Establish clear communication channels with suppliers to address any issues or concerns related to labor standards promptly.
- If necessary, suppliers will be asked to provide additional information or documentation to demonstrate their commitment to eradicating forced labor and child labor.
- Perform immediate audits of suppliers identified as high-risk.
- Terminate contracts with suppliers who fail to comply with corrective action plans or show unwillingness to improve.



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APPROVAL AND ATTESTATION

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of [title], attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

DAVID LAM (I HAVE THE AUTHORITY TO BIND TFI FOODS LTD.)

PRESIDENT

May 26, 2025