



2024 Modern Slavery Report Pursuant to Canada's *Fighting Against Forced Labor and Child Labor in Supply Chains Act*

Entity: T. Marzetti Company
Reporting Period: July 1, 2023 to June 30, 2024

1. Introduction:

- 1.1. This report ("**Report**") is prepared by T. Marzetti Company ("**Reporting Entity**", "**we**" or "**our**") and is made pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("**Act**").
- 1.2. This Report relates to the financial year ended June 30, 2024 (the "**Reporting Period**").
- 1.3. We also report under the United Kingdom's *Modern Slavery Act 2015* and California's *Transparency in Supply Chains Act*.

2. Steps taken to prevent and reduce the risks of forced labor and child labor:

- 2.1 The general steps we have taken during the Reporting Period to prevent and reduce the risks of forced labor and child labor in our operations and supply chains include implementing additional policies and procedures that specifically address forced labor and child labor, adopting tools and technologies to monitor current processes and procedures, conducting an audit on certain of our manufacturing facilities, and engaging with third-party entities to address and improve social risks in our business practices and supply chains.

3. Structure, Activities, and Supply Chain:

Structure

- 3.1. T. Marzetti Company ("**T. Marzetti**") is a company incorporated under the laws of the State of Ohio with principal executive offices located in Westerville, Ohio, United States. We are a wholly owned subsidiary of Lancaster Colony Corporation, a publicly traded company incorporated under the laws of the State of Ohio with principal executive offices located in Westerville, Ohio, United States.
- 3.2. We have been in operation through several different ventures since 1896. Within the Reporting Period, T. Marzetti employed approximately 350 people worldwide. There were no employees located in Canada.
- 3.3. T. Marzetti is the importer of record for products into Canada from the United States.

Activities

- 3.4. T. Marzetti is a manufacturer, marketer and seller of specialty food products for the retail and foodservice channels. Our brands include Marzetti®, New York BRAND Bakery®, Sister

Schubert's®, Reames® (a product line of frozen egg noodles and dumplings), Girard's® (a product line of salad dressings and vinaigrettes), Caesar Cardini's® (a product line of salad dressings, vinaigrettes and croutons), Chatham Village® (a product line of croutons), Inn Maid® (a product line of egg noodles), Amish Kitchens® (a product line of egg noodles), Romanoff® Caviar (a product line of lumpfish and salmon caviar) and FlatOut, Inc.® (a product line of flatbreads). As of the date of this Report, FlatOut, Inc. has ceased production of all products.

- 3.5. In addition to the products we manufacture under the above-noted brands that we own and operate, T. Marzetti also manufactures private-label food products for other foodservice companies and grocery retailers.
- 3.6. Products manufactured by T. Marzetti are distributed in the United States and Canada and can be found at several grocery retail and foodservice chains across the country.

Supply Chain

- 3.7. We partner with a diverse supply base to provide us with the raw materials, components, sub-assemblies, manufacturing services, finished goods, indirect goods, and services necessary to manufacture and distribute products to our customers and channel partners. A significant majority of our Tier-1 Suppliers (as defined herein) are based in the United States. The remainder are located in Canada, Germany, Great Britain, Israel, and Italy. A significant portion of our supply spend is on commodities, including soybean oil, flour, eggs, and sweeteners.
- 3.8. Our products under all brands are manufactured in the United States.
- 3.9. In addition to the employees we hire directly from the United States, we also engage with temporary labor agencies to assist with the onboarding of temporary workers. We require the agencies that we work with to undertake measures to ensure worker's rights are protected in the onboarding process and throughout the employment relationship. There are minimum age requirements in compliance with applicable laws for all temporary workers and all workers employed by third parties who perform work on our premises.
- 3.10. We import products into Canada exclusively from the United States by road, with T. Marzetti as importer of record. Some products we import are temporarily stored in warehouses located in Canada. Other products are shipped by road directly to retailers and distributors across the country.
- 3.11. During the Reporting Period, products imported and/or sold in Canada under our owned and operated brands included products under the FlatOut, Inc.®, Sister Schubert's® and Caesar Cardini's® brands. We also imported and distributed products to our grocery retail and foodservice clients, as applicable.

4. Policies and Due Diligence Processes in Relation to Child and Forced Labour:

- 4.1. Our policies and due diligence processes in relation to forced labor and child labor are prepared, maintained and implemented in collaboration with Lancaster Colony Corporation as our parent company.

- 4.2. We strive to build comprehensive practices and – where appropriate – standardized processes to mitigate human rights risks across operations and supply chains. Our approach to developing, managing and monitoring these practices and their measurements involves collaboration and engagement of stakeholders across our organization.
- 4.3. We take the prevention of social risks in our supply chain seriously and are committed to endeavouring to mitigate any potential risks that may arise. We explicitly prohibit the use of forced labor and child labor, and our core policies and processes reflect our commitment to respecting and championing the protection, safety, security, and wellbeing of our workforce and of the workers throughout our supply chain. We value and seek out Suppliers and Business Service Providers (as defined herein) committed to upholding human rights principles, including the protection of their workforce. In addition to compliance with all applicable federal, state, and local laws and regulations, our Supplier Code of Conduct provides that our Suppliers must act in accordance with principles and guidelines that protect and promote human rights. We expect the same of our Business Service Providers.

Policies

- 4.4. Our policies are representative of an enterprise-wide, all-encompassing approach and are applicable to all of T. Marzetti's activities.
- 4.5. These policies help to guide our internal processes and contribute to our efforts to mitigate forced labor and child labor in our operations and supply chains. A number of these policies are also publicly available on Lancaster Colony Corporation's [website](#).

Human Rights Statement and Approach

- 4.6. Our Human Rights Statement and Approach ("**Human Rights Statement**") outlines our commitment to respecting human rights in our engagements with our employees, Suppliers, and Business Service Providers (as defined herein). Our approach to this commitment is informed by the United Nations Guiding Principles on Business and Human Rights ("**UNGPs**") and the Ethical Trade Initiative's ("**ETI**") Base Code and includes provisions for: child labor; forced labor; fair compensation and working hours; freedom of association and collective bargaining; anti-discrimination and harassment; respect, dignity and diversity; health and safety; and reporting and remediation.

Supplier Code of Conduct

- 4.7. Our Supplier Code of Conduct ("**Code**") applies to entities that provide goods or services to us, including direct and indirect suppliers, co-manufacturers, distributors, vendors, agents, and contractors ("**Supplier(s)**"). We do not require certain business service providers we work with (including professional advisors, lawyers, accountants and certain software suppliers ("**Business Service Providers**")) to comply with the Code.
- 4.8. The Code includes the prohibition of the use of forced labor and child labor, as well as provisions for no hazardous work by young workers, freedom to terminate employment, and compensation guidelines.

- 4.9.** The Code specifically states the following (note that reference to “Lancaster Colony” would apply to the Reporting Entity):

Treatment of Workers:

“Lancaster Colony does not engage in or tolerate the unlawful employment or exploitation of children in the workplace or the use of forced labor in the manufacture of products it sells or the raw materials for those products. Lancaster Colony values Suppliers committed to treating their workforce ethically and will not accept products or services from Suppliers that employ or utilize child labor or forced labor in any manner. Suppliers shall not support or engage in slavery or human trafficking in their own operations or any part of their supply chains. All labor must be performed by workers whose presence is voluntary, and, in addition to compliance with all applicable laws and regulations, Suppliers must act in accordance with principles and guidelines that protect and promote human rights. Suppliers shall ensure that they and any party in their own supply chain do not support, engage in or require any: Compelled, involuntary, or forced labor; Labor to be performed by children or minors in hazardous work conditions; Bonded labor; Indentured labor; Prison labor at less than minimum wage”

No Hazardous Work by Minors:

“Suppliers shall not support, engage in, or require any hazardous labor to be performed by any person under the age of 18, whether in their own operations or their supply chain. Hazardous labor involves any work, that by its nature or the circumstances in which the work is undertaken, involves the substantial risk of harm to the health or safety of the worker or coworkers if adequate protections are not taken. No person under the age of 18 years old may be employed or authorized by a Supplier to work on Lancaster Colony premises without prior approval of the Legal Department of Lancaster Colony.”

Gifts, Entertainment and Anti-Bribery

“Suppliers must not offer cash, favors, gifts, or entertainment of more than nominal value to any Lancaster Colony worker without the prior written authorization of the Lancaster Colony legal department. Suppliers must not offer, give, demand, or accept a bribe, kickback, corrupt payment, inappropriate gift, or improper advantage and must at minimum comply with all applicable anti-bribery laws and regulations. Suppliers shall also comply with Lancaster Colony’s Code of Business Ethics.”

- 4.10.** The Code also requires that Suppliers are able and willing to provide compliance documentation surrounding wage payments, employee identification, documents supporting age identification, work eligibility, and a timekeeping system that tracks working hours.
- 4.11.** The Code expressly states that each Supplier is responsible for any acts or omissions of its own suppliers, vendors, agents and subcontractors and their respective facilities such that, if any of the same acts or omissions were done by any of the Suppliers, this would constitute a violation of the Code.

- 4.12.** The Code is embedded in all new supplier contracts. We require all Suppliers to comply with the Code and expect Suppliers to implement robust management systems and maintain documentation to ensure compliance with the Code and the applicable laws and regulations. All new Suppliers must acknowledge their responsibility to comply with the Code during the contracting process. For existing Suppliers, we have incorporated a link to the Code in our contract renewal process for acknowledgment by these Suppliers. Additionally, when communicating with Suppliers, a link to the Code is included in all email communications, along with a reference explicitly stating that compliance with the Code is expected. Each of our Suppliers is required to communicate the substance of the Code throughout its own operations and its entire supply chain.
- 4.13.** All temporary labor providers are also required to verify their understanding and compliance with the Code, and T. Marzetti contractually requires these temporary labor providers to acknowledge our expectations in this regard.

Corporate Sustainability Disclosure Committee and Compliance Committee Charter

- 4.14.** Our Corporate Sustainability Disclosure Committee and Compliance Committee Charter lays out our expectations for our Corporate Sustainability Disclosure and Compliance Committee (“**Committee**”). The Committee is responsible for overseeing our dedication to sustainable environmental practices and socially ethical responsibility. This encompasses, among other things, ensuring adherence to regulations pertaining to human rights, ethical sourcing, workplace health and safety, and ethical business practices.

Human Rights and Ethics Policies and Statements

- 4.15.** Our Human Rights and Ethics Policies and Statements are clear that we are committed to promoting and respecting human rights and upholding an abiding commitment to uncompromising integrity. We are opposed to slavery and human trafficking and request employees and direct vendors to report any such violations immediately.
- 4.16.** The Human Rights and Ethics Policies and Statements also state that under no circumstances will we tolerate bribes or quid pro quo payments that are designed to procure or retain business or secure an improper advantage for us. We require employees to report instances of corruption, fraud, and bribery as these behaviors do not align with our core values.

Child and Forced Labor Policy

- 4.17.** Our Child and Forced Labor Policy reinforces our commitment to prohibiting child and forced labor in our operations and supply chain and provides that we endeavor to prohibit and do not engage in, condone or tolerate the unlawful employment or exploitation of children in the workplace, or the use of forced labor (*i.e.*, any work or service that a worker performs involuntarily, under threat of penalty) in the manufacture of products we sell. We will not knowingly accept products or services from any Suppliers or Business Service Providers that employ or use child or forced labor in any manner.
- 4.18.** We restrict employment to persons aged 18 or older who have also reached the applicable local minimum employment age or the applicable mandatory schooling age, whichever is higher.

If a breach of the Child and Forced Labor Policy is uncovered, the policy requires that we investigate and implement remediation measures expeditiously, including ceasing employment and investigating whether further measures can be taken to ensure that child's wellbeing.

Code of Business Ethics and Standards of Conduct

4.19. All our permanent full-time salaried employees, officers and directors are required to accept and adhere to our Code of Business Ethics ("**Code of Ethics**") and Standards of Conduct ("**Standards**") by specifically signing off that they have received and read both documents and that they understand their obligations to follow the principles set forth therein. Failure to comply with the Code of Ethics and Standards may result in disciplinary action up to and including suspension or termination with or without prior warning.

4.20. The Code of Ethics demonstrates our commitment to creating a respectful workplace that promotes the following behavior:

- honest and ethical conduct in all aspects of each employee's, officer's and director's actions on behalf of the Reporting Entity;
- compliance with applicable laws, rules and regulations;
- prompt internal reporting of violations of the Code of Ethics and proper reporting of any illegal behavior; and
- reporting any known or suspected criminal or other unethical activity involving the Reporting Entity or our employees.

4.21. The Standards state, among other things:

- Our facilities are to be operated in full compliance with laws and regulations designed to safeguard health and safety, and protect the environment;
- We will comply with applicable labor and employment laws and will strive to provide a safe workplace that respects diversity and personal needs; and
- Action which is determined to be of a harassing or abusive nature to any other of our personnel or invitee on our premises is grounds for severe disciplinary action, including termination.

4.22. All reports of potential violations are treated confidentially and are addressed as appropriate on a case-by-case basis. As described below, a toll free Help Line is available to anyone wishing to bring any such matter to the attention of management, supervisors, the Compliance Officer, or the audit committee of Lancaster Colony Corporation's board of directors. Concerns can also be raised to corporate counsel of Lancaster Colony Corporation.

4.23. Any action which is determined to be of a harassing or abusive nature to any of our personnel or invitee on our premises is grounds for severe disciplinary action, including termination.

4.24. We intend to incorporate an additional provision regarding human rights expectations into the Code of Ethics and Standards. The provision will link to our Human Rights Statement and all employees will be required to acknowledge and confirm compliance with their obligations under the Code of Ethics, including those related to forced or child labor.

Due Diligence Processes

- 4.25.** Our human rights due diligence processes align with international guidelines, including the UNGPs and the ETI Base Code, and are informed by industry best practices. To ensure these processes are effectively integrated and supported, the Committee fosters cross-departmental collaboration to establish accountability measures for overseeing, monitoring, and reporting on our overall sustainability strategy, priorities, and initiatives, including those related to forced and child labor. We are committed to continuous improvement, relying on the engagement, cooperation, and collaboration of all team members.

Risk and Impact Assessment

- 4.26.** We conduct Sedex audits to identify and assess adverse human rights risks and impacts in our operations. Three of our manufacturing sites underwent a Sedex audit during the Reporting Period. Our audit findings did not report any concerns related to forced or child labor in our facilities. We also conduct internal audits of our temporary labor agency providers and periodically complete EcoVadis assessments of our manufacturing operations.
- 4.27.** We ensure that age verification for all employees complies with applicable laws and regulations. Although our Child and Forced Labor Policy allows the employment of individuals over the age of 15 (see section 4.17 and 4.18), in practice we do not employ anyone under 18 in our operations. For employees contracted through temporary labor providers, we implement additional age verification measures, including facility-level checks, heightened security for overnight shifts, and routine audits of temporary labor providers to ensure compliance with our Supplier Code of Conduct.
- 4.28.** To assess potential risks in our supply chain, we have also implemented third-party risk management screening software (Ethixbase360), which helps identify human rights-related reports and other key issues. As a member of Sedex, we also review Sedex audit reports and corrective action plan reports (“CAPRs”) for our Suppliers who are on Sedex. Moreover, we began to use Sedex Radar to screen for inherent risk for a broad range of topic areas, including forced labor and child labor, within our supply chain.

Risk Mitigation

- 4.29.** We track progress on follow-up corrective actions from Sedex audits of our manufacturing facilities through our Corporate Sustainability function, ensuring all noted non-compliances are resolved. As noted at section 4.26, our audit findings did not report any concerns related to forced or child labor in our facilities.
- 4.30.** Our Supplier Code of Conduct is the foundation of our efforts to mitigate risks within our supply chain and we have implemented robust systems to better ensure the Code is understood and followed by applicable entities. As noted, the Code is embedded in all new supplier contracts and new Suppliers must acknowledge their responsibility to comply with the Code during the contracting process. All temporary labor providers are also required to verify their understanding and compliance with the Code.

- 4.31.** In accordance with the Supplier Code of Conduct, we may, in our discretion, request or conduct audits of facilities to confirm an individual Suppliers' compliance with the Code. Upon request, the applicable Suppliers are expected to fully cooperate in facilitating these audits and provide all relevant information and access to the premises. Where third-party audit standards such as those employed by Sedex are used, we work with the applicable Suppliers to reach an agreed-upon standard, scope and methodology for carrying out the audit.
- 4.32.** Any violations of the Code, and any unethical or illegal behavior, must be reported to us. An investigation is then conducted relative to a specific Supplier to determine if a breach of the Code has occurred and the severity of the breach. We then work with the applicable Supplier to develop corrective action plans as necessary. If necessary, we may terminate a business relationship with a Supplier, depending on the severity of the breach or the outcome of an audit.
- 4.33.** Suppliers must complete corrective actions for all non-conformance identified in both third-party audits and those conducted by us in a timely manner.

Grievance Mechanisms

- 4.34.** All employees are encouraged to report concerns directly to their managers or Lancaster Colony Corporation's Corporate Counsel/Compliance Officer, as we maintain an open-door policy. However, we recognize that some individuals may prefer an anonymous reporting option.
- 4.35.** As part of our compliance program, we offer a third-party Compliance Help Line ("**Help Line**") for anonymous reporting. Complaints can be submitted 24/7 via phone at 1-888-875-1167 (toll-free, available in 175 languages) or through the Help Line website. The Help Line provides a confidential avenue for reporting concerns, including unfair or unsafe labor practices and any indicators of child or forced labor.
- 4.36.** We regularly communicate information about the Help Line to employees through various channels, including our new hire orientation process, posters, town halls, our Code of Business Ethics and Standards of Conduct Policy, and training sessions. While employees are the primary audience for the Help Line, we also welcome submissions from our customers, business partners, and suppliers. We are exploring ways to improve communication about the Help Line to these stakeholders.
- 4.37.** Our Compliance and Legal function receives and reviews all complaints, engages the relevant departments, and ensures thorough investigation and resolution. In the Reporting Period, we did not receive any complaints through the Help Line related to forced or child labor. Additional information about how we process reports is available in Section 6 – Remediation Measures.

5. Risks of Forced Labor and Child Labor in Our Business Operations and Supply Chains:

- 5.1.** The food manufacturing industry continues to reflect notable risks for child labor and related concerns, and we recognize that forced and child labor can materialize in every aspect of our supply chain. We have begun to identify areas of heightened human rights risks in our operations and supply chains and are developing a formal assessment process for prioritizing due diligence measures on child and forced labor.

Business Operations

- 5.2. Our manufacturing facilities are located only in the United States, and each of the jurisdictions in which we operate have laws and regulations to protect workers from forced labor and child labor. We recognize that some of our facilities are located in areas in the United States that tend to have a workforce with employees who may come from vulnerable populations. We aim to mitigate these heightened risk factors by working to ensure that all facilities and workers operate in accordance with our relevant policies and processes, including the Code of Ethics and Human Rights Statement. In accordance with the Code, our Suppliers are required to comply with applicable laws, including those related to the eligibility of their employees to work in the United States.
- 5.3. We have identified temporary labor providers – and the workers employed through them – as a higher-risk group in our operations. To prevent forced or child labor, we implement additional safeguards with our temporary labor providers. Along with standard age verification checks for all employees, we conduct facility-level age verification for each incoming employee. Additionally, we perform quarterly audits of our temporary labor providers to ensure compliance with our Supplier Code of Conduct.

Supply Chain

- 5.4. We continue to enhance our risk-based approach to selecting our suppliers and verifying our product supply chains to help evaluate and address the risks of forced labor and child labor in our supply chains.
- 5.5. When monitoring risks in our supply chain, we account for social and environmental risks by industry, location, and other ways that consider our operations. Reliance on data to inform our perception of risks is a key aspect of our mitigation strategy.
- 5.6. As noted, the majority of our Tier-1 Suppliers are based in the United States, with the remainder located in Canada, Germany, Great Britain, Israel, and Italy. We plan to expand our supply chain risk assessments using Sedex Radar to identify potential areas of human rights risk in our supply chain as outlined in the 'Due Diligence Processes in Relation to Child and Forced Labor' section. We do not have visibility beyond Tier-1 Suppliers, but we intend to work on our supply chain transparency focusing on our key commodities.

6. Remediation Measures:

- 6.1. In the Reporting Period, no instances of child labor or forced labor were detected in our operations and supply chains, and therefore, no remediation measures, including those to address any loss of income to vulnerable families, were required.
- 6.2. All reports received from employees or other relevant stakeholders, including public allegations, are processed by our Ethics and Compliance team. The investigation process may vary depending on the nature of the case but can include interviews, reviews, external investigations, and other related actions. Upon completion of the investigation, we either close the case or take appropriate steps to remediate it.

6.3. We are committed to providing remediation if future incidents are detected and to further formalizing our remediation process.

7. Employee Training:

7.1. We require all salaried employees to complete mandatory Code of Ethics training and a modern slavery training module annually, covering forced and child labor, as well as related modern slavery risks. We are currently rolling out modern slavery training for our hourly employees, initially in a group learning format, and eventually through our employee training platform.

7.2. Management and employees who have direct responsibility for supply chain management are also required to take ethics coursework. Though they are not required to complete specific training on mitigating human trafficking and slavery risks within the supply chain, as noted, our Code of Ethics requires employees to report any illegal or unethical behavior.

8. Assessing Effectiveness:

8.1. To address non-compliances identified in our manufacturing facilities through the Sedex auditing process and documented in CAPRs, we develop a follow-up matrix to track progress in resolving these issues. We include in this matrix timescale tracking for our responses, our response to non-compliance, monitoring processes, and expected oversight.

9. Approval and Attestation:

This Report was approved on May 22, 2025 pursuant to subparagraph 11(4)(a) of the Act by the Sole Director (“**Director**”) of T. Marzetti Company.

I make this attestation in my capacity as Sole Director of T. Marzetti Company for and on behalf the Company.

Full name: David A. Ciesinski

Title: Sole Director

Date: 5/22/2025

Signature:  Signed by: David A. Ciesinski
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I have authority to bind T. Marzetti Company