



CROSBY FOODS LIMITED

## **Crosby Foods Limited**

*Canada's Trusted Food Manufacturer, Since 1879*

Telephone: 506-634-7515

Fax: 506-634-1724

327 Rothesay Avenue. Saint John, NB,

Canada E2J 2C3

crosbys.com

## **ANNUAL REPORT**

### **Bill S-211**

#### **PURPOSE**

This joint annual report for the 2026 financial reporting year (April 1, 2025 - March 31st, 2026) has been created by Crosby Foods Limited and Crosby Liquid Bulk Terminal ("Crosby Foods") for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9 (the "Act").

#### **OUR COMMITMENT**

Crosby Foods is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that Crosby Foods imports into Canada.

#### **CATEGORIZATION, SECTOR, AND INDUSTRY**

##### ***i) Crosby Foods is an entity under the Act***

Crosby Foods is a Canadian business that is headquartered in Saint John, New Brunswick. In terms of the Act's threshold requirements, on a combined basis Crosby Foods and Crosby Liquid Bulk Terminal has at least \$20 million in assets for at least one of its two most recent financial years, and it has generated at least \$40 million in revenue for at least one of its two most recent financial years.

##### ***ii) Our Sector and Industry***

Crosby Foods imports molasses and supplies retailers across Canada and the United States. It also is engaged in the product development, contract, and private label manufacturing of dry powder blends, dry sugar blends, and liquid blends.

Crosby Liquid Bulk Terminal forms part of Crosby Foods' supply chain of manufacturers, co-manufacturers, and producers. Crosby Liquid also provides a range of services, including third-party storage, heating, blending, and vessel loading and offloading.

#### **STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS**

##### ***i) Our Structure and Activities***

Crosby Foods is a corporation incorporated in the Province of New Brunswick. Its key activities are the manufacturing, wholesale trade, retail trade, and warehousing of food products for local consumers and world markets. The company is engaged in producing, selling, and distributing goods in and/or outside of Canada, as well as importing into Canada goods that are produced outside of the country.

##### ***ii) Our Supply Chain***

Crosby Foods sources and procures raw materials from various approved vendors from around the world. Guatemala is the primary source and supply of the molasses used in the products that are manufactured and distributed by Crosby Foods. North American vendors are also used to supply raw ingredients and packaging components to the company's manufacturing facility in Saint John, New Brunswick. The finished goods produced by Crosby Foods are primarily distributed across Canada with less than 5% going to the United States.



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### **iii) Steps Taken by Crosby Foods in 2025**

Crosby Foods took the following steps in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the company or of goods imported into Canada:

1. Ongoing internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains;
2. Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains;
3. Developing and implementing due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains;
4. Developing and implementing child protection policies and processes;
5. Monitoring suppliers; and
6. Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

During the reporting period, Crosby Foods surveyed suppliers and requested information related to Forced and Child Labour, specifically as it relates to Bill S-211. The business continues to enforce compliance as an important piece of their supplier approval process.

Crosby Foods maintains RainForest Alliance certification at the Crosby Foods' facility in New Brunswick. The audit includes a review of the company's compliance with all applicable labour standards, health and safety requirements, and environmental and business ethics. The scope of the audit includes all workers at the site, including direct employees, agency workers, workers employed by service providers, and workers provided by other contractors. The audit resulted in Crosby Foods' taking additional proactive measures and introduced a Child Remediation Policy and Program.



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## **POLICIES AND DUE DILIGENCE PROCESSES**

### ***i) Crosby Foods' Policies and Processes***

Crosby Foods has due diligence processes in relation to forced and/or child labour, including embedding responsible business conduct into policies and management systems.

Crosby Foods maintains several policies and processes to help identify and manage potential forced labour and child labour risks within the business and its supply chain, including:

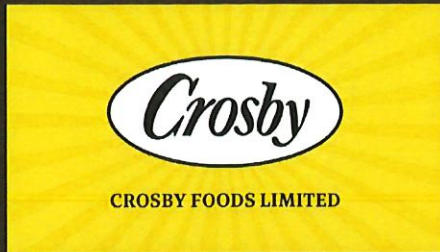
1. A Policy and Procedure Manual which prohibits the employment of workers under the legal working age pursuant to New Brunswick's Employment Standards Act.
2. An Employee Orientation Manual which recognizes Crosby Foods' responsibility to safeguard the well-being and safety of children and vulnerable individuals who may come into contact with the business. Crosby Foods is committed to creating a safe environment that promotes the welfare and protection of all individuals, particularly children, from abuse and neglect. All Crosby Foods employees and volunteers must adhere to the company policies and must report any concerns to the appropriate authorities as mandated by local laws.
3. A Whistleblowing Policy which sets out a safe and confidential method for employees to report observations or activities that may pose an immediate threat of harm to any individuals.
4. A Visitor/Contractor Policy for the New Brunswick facility which explicitly prohibits children under the age of sixteen (16) to be permitted in the operation areas unless approved by the plant manager.
5. A Child Remediation Policy that establishes a framework for identifying, responding to, reporting, and remediating any instances or risks of harm, neglect, or abuse of children in Crosby Foods' internal business practices. This policy applies to all employees, contractors, volunteers, and stakeholders involved in Crosby Foods' operations.

### ***ii) Supplier Policies and Processes***

Crosby Foods also relies upon the due diligence processes of its suppliers in relation to forced labour and child labour. In particular, the company that sources molasses on behalf of Crosby Foods has an ethical sourcing policy whereby suppliers are required to remediate any non-compliance with forced labour and/or child labour standards in a timely manner, and to undergo a corporate social responsibility compliance assessment upon request. This document has been reviewed and updated in 2025 in response to Bill S-211 and meets all requirements.

### ***iii) Customer Policies and Processes***

Crosby Foods is further covered by the policies and processes required by its customers to help identify and manage potential forced labour and child labour risks within the business and its supply chain. As such, Crosby Foods undergoes SMETA (Sedex Members Ethical Trade Audit) ethical sourcing audits at a regular frequency as required by customers and has implemented and maintained a Child Remediation Policy. The last SMETA audit was conducted Sept 23 & 24<sup>th</sup>, 2025, the company was found to be compliant with audit standards, with only 1 minor non-conformity identified which was corrected immediately. Additionally, Crosby Foods has incorporated due diligence assessment language into its supplier approval processes which are currently managed and audited under the Supplier Quality Approval program.



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### **FORCED LABOUR AND CHILD LABOUR RISKS**

Crosby Foods has started the process of identifying risks of forced labour and child labour. Given that the total supply chain includes raw materials and commodities from other countries, including Guatemala and China, Crosby Foods is aware that there may be higher risk of child labour and forced labour associated with certain regions, goods, and industries.

As an ongoing continuous improvement measure, Crosby Foods will continue taking steps to identify risks and address forced labour and child labour risks in its activities and supply chains.

### **REMEDATION MEASURES**

Although Crosby Foods has identified forced labour or child labour risks in its activities and supply chains, the company has not identified actual instances of forced or child labour. As such, the company has not undertaken any remediation measures.

### **REMEDICATION OF LOSS OF INCOME**

Crosby Foods has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

### **TRAINING PROVIDED TO EMPLOYEES**

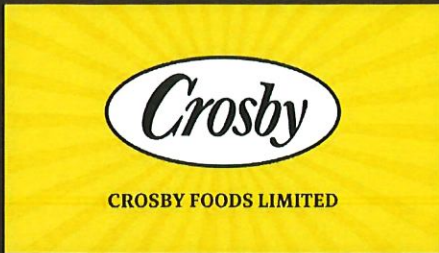
Crosby Foods provides mandatory training to its employees on the following policies and procedures relating to forced and/or child labour: Policy and Procedure Manual, Employee Orientation Manual, Whistleblowing Policy, Visitor/Contractor Policy, and Child Remediation Policy. This training is mandatory for all employees and is part of the onboarding process for new employees and is refreshed annually.

### **ASSESSING EFFECTIVENESS**

Crosby Foods successfully maintains Rain Forest Alliance and SMETA audit compliance. The certification audits review Crosby Foods' compliance with all applicable labour standards, health and safety requirements, and environmental and business ethics. The audits further strengthened and reinforced the aforementioned policies and procedures.

### **APPROVAL AND 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 listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.



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IN WITNESS WHEREOF the authorized signing officer(s) of Crosby Foods Limited have executed this report as of the effective date of the signatures set out below.

SIGNED

April 28, 2026  
Date

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CROSBY FOODS LTD.

PER: 

Name: James Crosby

Title: Chief Executive Officer

I have the authority to bind **CROSBY FOODS LTD.**