

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR

2025 Annual Report

May 2025



1. Introduction

Export Packers is a leading international food business headquartered in Brampton, Ontario, Canada. We aim to make a positive impact in the communities in which we operate through our actions and our relationships with our partners around the world. We are committed to providing our customers with high-quality products which have been produced in a safe and responsible manner by organizations that adhere to applicable human rights and employment standards.

This is a joint report (this "**Report**") under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the "**Act**") for Export Packers Company Incorporated ("**EPCI**") and its subsidiaries Export Packers Company Limited ("**EPCL**") and Export Packers Seafood Limited ("**EPSL**" and together with EPCI and EPCL, "**Export Packers**"). This Report is for Export Packers' fiscal year ended March 31, 2025 (the "**Reporting Period**").

Unless the context indicates otherwise: (i) all data and information contained in this Report relates to the Reporting Period and represents aggregated information on behalf of Export Packers' activities; (ii) all monetary figures in this Report are presented in Canadian dollars; and (iii) the use in this report of the terms "our", "we" or "us" refers to Export Packers or, depending on the context, one of EPCI, EPCL or EPSL.

For more information on our commitment to effecting positive environmental and social change, please see our Environmental, Social & Governance Policy at: www.exportpackers.com.

Please direct any inquiries to: legal@exportpackers.com

2. Steps taken to prevent and reduce the risk of forced and child labour

In the Reporting Period, Export Packers took the following steps to prevent and reduce the risk that forced or child labour is used in our business and supply chains.

- Export Packers' Supply Chain Steering Committee, comprised of senior management representatives from Legal, Procurement and Quality Assurance, met regularly to review our existing policies and procedures pertaining to supplier onboarding and preventing forced and child labour.
- Made certain updates to our existing policies and procedures pertaining to the supplier onboarding process and Export Packers' Preventing Forced and Child Labour Policy to expand the scope of products which Export Packers has identified as being at a higher risk for forced or child labour (compared to our products) and therefore subject to additional due diligence requirements pursuant to our policies.
- Integrated our existing policies and procedures pertaining to the supplier onboarding process and Export Packers' Preventing Forced and Child Labour Policy to the

purchasing activities conducted by a seafood processing plant acquired by Export Packers during the Reporting Period.

- Provided training to employees whose roles require them to perform approval functions relating to Export Packers' supplier onboarding process and due diligence requirements for purchases of higher-risk products.

More details on these actions, as well as our policies and procedures pertaining to supplier onboarding and preventing forced or child labour, are set out in this Report.

3. Structure, activities and supply chain

3.1. Our structure

EPCI, EPCL and EPSL are corporations governed by the *Business Corporations Act* (Ontario) and are privately held corporations. EPCI is the sole shareholder of each of EPCL and EPSL.

Export Packers employs approximately 285 people, almost all of whom are based in Canada. We have small representative or sales offices in the United States, Brazil, India, Argentina, and China (Hong Kong).

3.2. Our activities

EPCL operates as an importer, exporter and wholesaler of various food products. EPCL's customers include retail, foodservice, and further-processor customers throughout Canada and around the world. EPCL sells its products through private-label arrangements, third-party brands and under its own brands, including Ocean Jewel®, Diamond Harvest®, Green Ocean® and Toppits®.

EPSL operates two seafood processing facilities in Brampton, Ontario, Canada, which produces various seafood products for sale to retail and foodservice customers in Canada. EPSL also imports certain raw materials for use in its production activities.

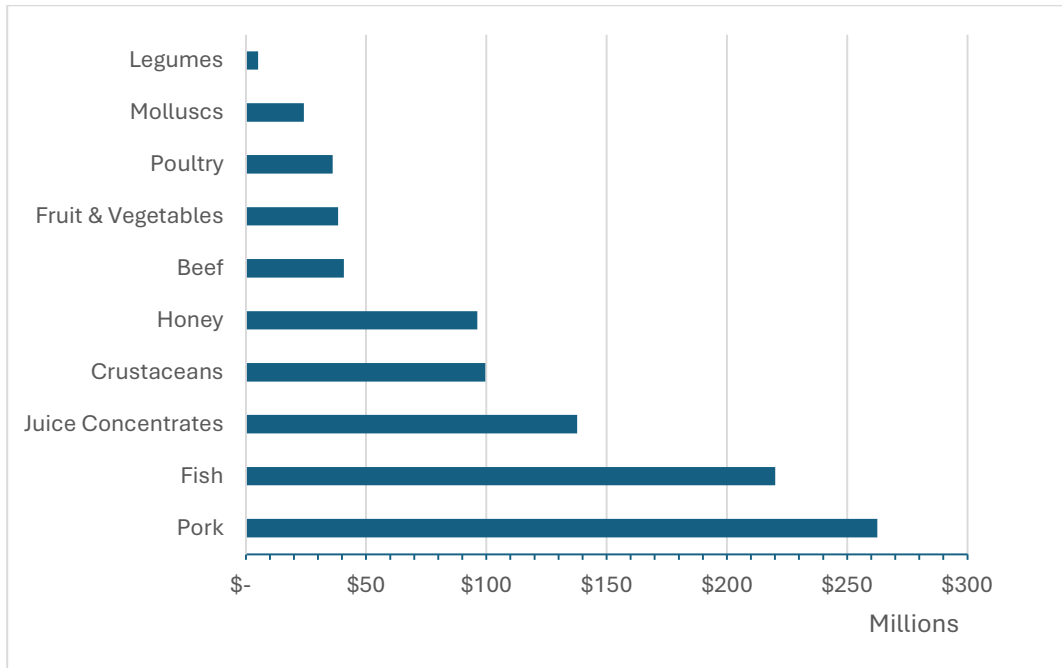
EPCI is a holding company and carries on no direct business activities.

During the Reporting Period, Export Packers acquired certain of the assets and business previously carried on by Toppits Foods Ltd. ("**Toppits**"). The transaction included the acquisition of Toppits' domestic seafood processing and manufacturing operations located in Brampton, Ontario which are included in EPSL's description of its activities above.

3.3. Our supply chain

From an operational perspective, Export Packers sells products that are produced by it as well as products produced by third-parties. We rely on many suppliers for our finished goods, raw materials, ingredients, and other goods. In some cases, these suppliers also maintain business relationships with other partners.

Top Purchases by Product Type



Purchases by Region



4. Policies and due diligence processes

We are committed to carrying out our business lawfully, ethically and in a manner that makes a positive impact in the communities in which we operate. To accomplish this, Export Packers looks to conduct business with suppliers that share our commitment to responsible and ethical business practices and has adopted certain policies and due diligence processes in relation to preventing forced and child labour.

4.1. Supplier Code of Conduct

Our Supplier Code of Conduct sets forth our expectations of our suppliers, including that they operate their businesses ethically, with integrity and in accordance with all applicable laws and that they also treat people with dignity, respect and in accordance with their unalienable human rights. This means we expect suppliers to adopt behaviours and practices that are consistent with our Supplier Code of Conduct and be able to demonstrate their compliance with, among other matters, the following commitments:

- Not engage in involuntary labour practices, including the use of forced, bonded, trafficked, or involuntary prison labour.
- Not engage in the use of child labour.
- Comply with all local employment laws, including around working hours, overtime and minimum wage.
- Not engage in discriminatory behaviour in respect of workers and not subject workers to any form of verbal, physical or sexual abuse or harassment.
- Clearly set out employment terms in a language spoken by their employees and permit employees to keep all identity documents and work permits in their possession.
- Provide a healthy and safe workplace and take all measures to prevent work-related injuries, illnesses and accidents.
- Reporting violations or suspected violations.

Adherence to our Supplier Code of Conduct has been a requirement for all new product suppliers since its introduction and Export Packers is in the process of obtaining adherence from existing product suppliers to the Supplier Code of Conduct. Our Supplier Code of Conduct requires that all suppliers must enforce these provisions with their own supply chain and subcontractors (ie. indirect suppliers); however we do not currently have procedures in place to actively verify the enforcement of the Supplier Code of Conduct with indirect suppliers at this time. We reserve the right to verify compliance with the Supplier Code of Conduct through site visits and inspections by our personnel or designated agents.

4.2. Preventing Forced and Child Labour Policy

Export Packers' Preventing Forced and Child Labour Policy restates Export Packers' commitment made in its Environmental, Social and Governance Policy to not purchase products from any supplier who engages in forced or child labour or who otherwise fails to comply with employment laws in their jurisdiction.

Pursuant to Export Packers' Preventing Forced and Child Labour Policy, we screen product purchases based on country of origin. Product purchases which are considered higher-risk

products pursuant to such policy are subject to additional due diligence requirements specified in the policy.

Additional information on Export Packers' process for determining higher-risk products pursuant to its policies and managing associated risks is detailed further below.

5. Forced labour and child labour risks

Given that the vast majority of our workforce is comprised of office workers and plant operations employees located in Canada who are employed or contracted directly by Export Packers, we consider there to be a very low risk of forced or child labour in our direct operations and focus our risk assessment and mitigation on the activities of our third-party suppliers.

As reported last year, in the period April 1, 2023 to March 31, 2024, Export Packers' Supply Chain Steering Committee conducted a desktop risk assessment of the products we purchase based on an analysis of current events, industry practices, stakeholder concerns, and legal requirements. This review focused on Export Packers' product procurement activities given the significant quantity and variety of food products purchased by Export Packers across many different countries and regions.

As a result of such review, Export Packers developed an internal list of products, based on country of origin, which we consider to be at a higher-risk for forced or child labour, as compared with other product purchases ("**higher-risk products**"). This is consistent with how the United States Department of Labor approaches risk categorization in its annual List of Goods Produced by Child Labor or Forced Labor Report (the "**DOL Report**").

Our Supply Chain Steering Committee meets regularly to review our supply chain and our existing policies and procedures, including any changes to the risk of forced or child labour in certain regions based on current events, industry practices or stakeholder concerns. During the Reporting Period, we amended our internal list of higher-risk products to reflect the results of the 2024 DOL Report (released in September 2024). Each product listed on the 2024 DOL Report is identified as a higher-risk product by Export Packers for its diligence and compliance purposes and Export Packers also includes certain other products as higher-risk products based on the advice of its Supply Chain Steering Committee.

Pursuant to Export Packers' Preventing Forced and Child Labour Policy, product purchases which are considered higher-risk products are subject to additional due diligence requirements specified in the policy. Such policy and due diligence requirements are focused on direct suppliers at this time.

6. Remediation

Export Packers has established an incident management and escalation process for promptly addressing any reports of forced or child labour that may be received through our supply chain.

6.1. Remediation measures

If we identify an instance of non-compliance with our policies by any supplier (including any indirect supplier), we may, as appropriate, introduce remediation plans with such suppliers, or suspend or terminate relationships with such suppliers. The approach adopted and the scope of any remediation plan will depend on the nature and severity of the non-compliance detected. Export Packers prefers, wherever possible and appropriate, to work with suppliers to remediate non-compliance issues as we recognize the importance of working to improve the conditions for workers, especially in developing countries and regions.

6.2. Remediation of loss of income

Our goal is to prevent the occurrence of any instance of forced or child labour within our supply chain. We do not currently have any formal policy on how we might document or remediate any loss of income related to the impact of these activities.

7. Training

All employees whose roles require them to perform approval functions relating to Export Packers' supplier onboarding process and due diligence requirements for purchases of higher-risk products have received training on the requirements of these policies and procedures.

Annual training for all employees within our procurement and quality assurance teams on the requirements of our Preventing Forced or Child Labour Policy will occur in July/August, 2025.

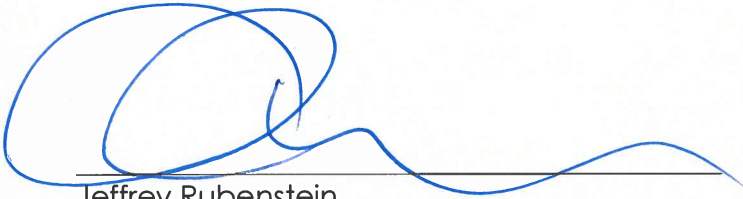
8. Assessing effectiveness

Export Packers' Supply Chain Steering Committee meets regularly to review our supply chain and our existing policies and procedures, including any changes to the risk of forced or child labour in certain regions based on current events, industry practices or stakeholder concern. Our Supplier Code of Conduct and Preventing Forced and Child Labour Policy are periodically revised based on such reviews.

9. Approval and attestation

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Export Packers Company Incorporated as the joint report of Export Packers.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Export Packers. 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 referred to herein.



Jeffrey Rubenstein
Chair, Export Packers Company Incorporated
May 27, 2025
I have the authority to bind the Corporation.