

## 2023 Supply Chain Act Annual Report

This Annual Report (the “**Report**”) is produced in accordance with section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Supply Chains Act**” or the “**Act**”) and is filed for the following entities, each a member of the Burnbrae Farms corporate group (“**Burnbrae Farms**”):

- Burnbrae Farms Limited;
- Ferme St-Zotique Ltée; and
- Burnbrae FarmCo 19 Inc.,

(each a “**Reporting Entity**” and collectively, the “**Reporting Entities**”, “**we**”, “**us**” or “**our**”) covering the twelve-month financial year ended August 31<sup>st</sup>, 2023 (the “**Reporting Period**”).

Burnbrae Farms has embraced sustainability practices over the years to ensure the long-term success of our business, our employees, our suppliers and other various stakeholders. At its core, sustainability is about both the environment and human rights. Forced labour and child labour are contrary to human rights and against our vision and values. At Burnbrae Farms one of our values centres around “Leading Responsibly” which entails abiding by our Code of Conduct as well as our other policies. It is also contrary to one of our five key areas of sustainability focus, namely the health and wellbeing of our employees and by extension the health and wellbeing of people employed by our suppliers. This report constitutes our first report under the Act and provides a summary of our objectives and progress in regards to the elimination of forced labour and child labour in our supply chains.

### 1. Our structure, operations and supply chain

Burnbrae Farms is a sixth-generation, Canadian family-owned and operated company. We offer world-class products such as shell eggs, hard-boiled and liquid eggs, and fully cooked omelets and patties. Burnbrae Farms is committed to providing Canadians from coast to coast with safe, affordable, accessible, nutritious eggs and egg products.

We market to retail, industrial, and food service clients across Canada and select U.S. and international markets. Burnbrae Farms produces, grades and processes its products only in Canada, where it employs over 1,700 people and partners with over 400 farmers. Burnbrae Farms operates five farms, eight grading facilities and three processing plants located in Quebec, Ontario, Manitoba, Alberta and British-Columbia.

The Reporting Entities are either producing goods in Canada, selling goods in Canada or into the United States, distributing goods in Canada or abroad, or importing into Canada goods produced outside of Canada.

All Reporting Entities are wholly-owned subsidiaries of holdings corporations, themselves held by the Hudson family trust. The Hudson family established the original Burnbrae Farm in Lyn, Ontario in 1891 and still owns and operates Burnbrae Farms.

In Canada, the Reporting Entity operates many prominent and valued brands including Egg Creations!, Simply Egg Whites, Egg Bakes!, EGG Bites and EGGS2go!.

### 2. The steps we have taken in 2023 to prevent and reduce the risk of forced labour and child labour

Our focus in 2023 was on conducting an internal assessment of risks of forced and/or child labour within the Reporting Entities’ activities and supply chains. We carried out a prioritization exercise

and focused due diligence efforts on the most severe risks of forced and child labour. This prioritization exercise has led to the identification of various tasks that will be undertaken in 2024. Some of these tasks will include performing training, adding clauses to our Supplier Agreements, distributing a survey tool to our largest and most at risk suppliers, analysing and adjusting our temporary foreign workers agency contracts and practices and partnering with provincial and federal Egg Marketing Boards to ensure egg farmers are also in compliance.

### **3. Policies, due diligence and controls**

Burnbrae Farms has, in recent years, adopted several tools aimed at furthering its sustainability goals which include the topics of forced labour and child labour.

#### **(a) Sustainability Reports**

Burnbrae Farms is proud to have published, in 2022, its very first sustainability report covering the efforts we have undertaken in the previous two years in the fields of environment, animal care, health and wellbeing, safe nourishing food and community spirit (our **“Key Areas of Focus”**). This initiative was repeated in 2023 (together with the sustainability report published in 2022, the **“Sustainability Reports”**). Going forward on an annual basis, we plan to publish our updated Sustainability Reports.

In our Sustainability Reports, we adopt the reporting framework recommended by the United Nations Sustainable Development Goals (**“SDGs”**). Burnbrae Farms supports the direction and approach of the SDGs, which represent a universal call to action to end poverty, protect the planet, and ensure prosperity for all. In our Sustainability Reports, our goal is to establish clear links between our efforts and specific SDGs that are most affected by our industry, and where we feel we have a unique opportunity to leverage our scale and expertise for positive change. We do so by identifying which SDGs are targeted in each of our Key Areas of Focus.

We align our sustainability disclosure with the SDGs, including goal 8 which aims to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all, and its target 8.7 the objective of which is to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Our metrics and key performance indicators are informed by the standards outlined in the Global Reporting Initiative, an independent, international organization providing language and metrics to help communicate businesses’ impacts.

Amongst other topics, our Sustainability Reports outline and track Burnbrae Farm’s progress in its Key Areas of Focus in the form of a Sustainability Report Card. For each area covered in the Sustainability Report Card, we set ourselves targets and we monitor our progress year over year. For more information on our Sustainability Report Card, please refer to section 4 of this Report.

#### **(b) Employee Code of Conduct**

The Burnbrae Farms’ Employee Code of Conduct (the **“Code”**) sets high standards for conducting business in a legal and ethical manner and serves as the foundation of our corporate policies and procedures. The Code, which all employees, officers and directors are required to abide by and sign, was updated in 2022.

The Code states that Burnbrae Farms and all people covered by the Code are required to abide by all laws in the jurisdictions where they operate, which includes the Act. The Code applies the

same requirement independent of whether we conduct business with international customers, suppliers, contractors or government agencies.

### **(c) Confidential Reporting System**

Burnbrae Farms has established a Confidential Reporting System so that any signatory of the Code can question an action taken by a colleague and report a situation where the signatory suspects an ethics violation or a breach of the Code.

The Confidential Reporting System takes the form of a phone hotline which signatories can reach at anytime.

If a signatory reports potential wrongdoing, every effort will be made to protect their confidentiality, as applicable laws permit, and Burnbrae Farms will ensure that no retaliation occurs.

## **4. Risk Assessment Methodology and Results of Assessment**

We use the Sustainability Report Card contained in our Sustainability Reports to set ourselves targets and to monitor our progress.

We see our goal of eradicating forced labour and child labour from our supply chain as fitting within the Health and Wellbeing Area of Focus of our Sustainability Report. In 2022, in this Area of Focus, we were on track to meet two targets, we achieved two targets and we established four new targets. In 2024 we will add progress updates on our goals that address action items following our risk analysis regarding forced and child labour.

The identification of targets in the Sustainability Report Card forms the heart of our risk assessment methodology. When new risks are identified, we set ourselves goals related to the management and elimination of those risks. Every year, we assess our goals and decide whether the previous year's identified targets are achieved or on track to be met.

## **5. Risks of forced labour and child labour in our operations and supply chains**

Since 2021, Burnbrae Farms participates in the Temporary Foreign Worker Program (the "TFWP") which allows Canadian employers to hire foreign nationals to fill jobs in cases where qualified Canadians aren't available. We launched the program in our Lyn, Ontario facilities and due to its success, we have expanded it to other grading locations in Ontario and British Columbia as well as our further processing facilities in Upton, Quebec and Brockville, Ontario.

We recognize the forced labour risks associated with migrant workers participating in the TFWP. Migrant workers face heightened susceptibility to exploitative recruitment tactics. When recruitment fees are imposed on migrant workers by recruiters and employment agents, migrant workers can become indebted to them. Non-repayment of these dues can lead to dire repercussions, including prolonged work hours and wage deductions. This burden of debt, compounded by the uncertainty surrounding job security and residency status, renders migrant workers exceptionally prone to various manifestations of modern slavery.

In its participation in the TFWP, Burnbrae Farms carefully selects the recruiters and employment agents it contracts with. In fiscal 2023, seventy percent (70%) of the task associated with recruiting candidates was performed in-house by Burnbrae Farms' HR team. We aim to avoid the use of employment agents to ensure we are following best practices and to develop the expertise internally. Burnbrae Farms only deals with reputable service providers and commits to terminating its relationship with any recruiter or employment agent immediately upon discovery of any kind of predatory behaviour described above. To our knowledge, we have not uncovered any

indications of forced labour or child labour within our operations and supply chain. Our ongoing review of our risk assessment procedures, conducted annually, aims to detect any potential shortcomings in our evaluations.

## **6. Remedial Action Taken during the Reporting Period**

During the Reporting Period, Burnbrae Farms did not perform any remediation actions with respect to forced labour and child labour.

## **7. Our remediation processes**

Given that no remediation measures were taken during the Reporting Period, we did not adopt any remediation process to deal with possible occurrences of forced labour and child labour in our operations and/or supply chains.

## **8. Remediation actions for the loss of income to the most vulnerable families that results from any measure taken to eliminate forced labour and child labour from our operations and supply chains**

Given that we have not taken any remediation during the Reporting Period, we consequently did not perform any remediation actions for the loss of income to the most vulnerable families.

## **9. Our Training**

One of the goals we set ourselves in our Sustainability Report Card under the Health and Wellbeing Area of Focus pertains to the training of our workforce. In 2024, we aim to integrate sections on forced labour and child labour into the technical training, on-boarding, cross training and coaching programs we are developing.

New employees in key roles will receive training through in person or virtual sessions and through our training video project. The topics covered include animal care, equipment safety, food safety, diversity and inclusion.

All employees have signed a copy of the Code. This demonstrates that they have read and understood its contents which include sections relating to abidance to laws of the jurisdictions in which employees are located. Seeing that all of our production, grading, farming and processing activities are located in Canada, the laws to which employees abide include the Act.

## **10. Assessing our effectiveness**

We are committed to continually evaluating and enhancing our key performance indicators to gauge the effectiveness of the implementation of the objectives outlined in our Sustainability Reports as well as to continuously refine our human rights approach. The efficiency of each Reporting Entity's industry-specific due diligence process is regularly assessed to ensure its relevance and alignment with our business operations, regulatory changes, industry norms, and best practices. Through these measures, each entity ensures compliance with all pertinent laws and regulations across our operational jurisdictions, including those addressing forced labour and child labour risks.

We engage in constructive dialogue with suppliers whenever corrective actions are necessary, we diligently monitor the progress of these actions from initiation to completion. Notably, no issues requiring review were identified in fiscal 2023, and there were no incidents of forced labour or child labour associated with our suppliers through our monitoring processes.

In evaluating the efficacy of our corporate social responsibility risk management approach, we solicit feedback from relevant internal and external stakeholders.

#### **11. Our consultation and governance process**

In preparing this Report, each Reporting Entity engaged other entities it owns or controls. It also consulted with key areas of our organization to prepare this Report, including departments or teams dealing with procurement, human resources, government relations, legal and contractual issues, our sustainability specialists and our external legal counsel. These teams operate across our enterprise, including across the subsidiaries to which this Report applies. This consultation process has supported our business-wide approach to human rights which include forced labour and child labour.

#### **12. Approval**

This Report was approved by the sole shareholders of each Reporting Entity acting as the governing body of each Reporting Entity on May 20, 2024.

#### **13. Conclusion**

Each Reporting Entity steadfastly upholds its dedication to eliminating the occurrence of forced labour and child labour within our operations and throughout our supply chains. We remain resolute in the ongoing examination of our policies, protocols, and operational methodologies, periodically reviewing and fortifying our defenses against forced labour, child labour, and all manifestations of human rights violations.


**14. Attestation (Public Safety Canada)**

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.

Dated this       <sup>th</sup> day of May, 2024

**Burnbrae FarmCo 19 Inc.**

**Burnbrae Farms Limited**



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Per: Margaret Hudson

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Per: Margaret Hudson

Director of the sole shareholder of Burnbrae FarmCo 19 Inc., I have the authority to bind Burnbrae FarmCo 19 Inc..

Director of the sole shareholder of Burnbrae Farms Limited, I have the authority to bind Burnbrae Farms Limited.

**Ferme St-Zotique Ltée**



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Per: Margaret Hudson

Director of the sole shareholder of Ferme St-Zotique Ltée, I have the authority to bind Ferme St-Zotique Ltée.