

2023 Annual Report on Forced Labour in Canadian Supply Chains

This report is for: an Entity, as defined by The Supply Chains Act
Legal name of reporting entity: Ronald A. Chisholm Limited
Location of reporting entity: Toronto, Ontario, Canada
Business number of reporting entity: R104613005
Financial reporting period: January 1, 2023, to December 31, 2023
Report date: May 31, 2024
Report version: First

❖ Overview of Company Structure, Activities, and Supply Chains:

Ronald A. Chisholm Limited (the “Company”) is a Canadian entity, engaging in the import and export of domestic and international meat and dairy commodities. The Company provides services related to buying and selling of food commodities, financing and risk management, and international supply chain management for clients.

❖ The steps the entity has taken during its 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 entity or of goods imported into Canada by the entity:

In the 2023 financial reporting period, the Company learned of Bill S-211 and researched all relevant requirements. The Company completed a self-assessment and determined that it is deemed a reporting entity with reporting obligations in accordance with the Act.

The Company began outlining a framework and go-forward action plan to identify and address forced labour in our supply chain in coordination with our partners, suppliers, and service providers.

The Company updated segments of its corporate policy to incorporate relevant aspects of the bill. Updates to corporate policies were included in the Company’s employee manual and made available to all existing employees. As part of the Company’s onboarding process, all newly hired employees are required to review the Company’s corporate policies and acknowledge receipt of, and agreement to comply with, all Company policies and procedures.

❖ Policies and due diligence processes in relation to forced labour and child labour:

The Company has the following corporate policies in place to address activities related to forced labour and child labour; all existing employees have access to corporate policies via the Company’s employee manual:

CODE OF CONDUCT STANDARDS

The Corporation expects each employee to maintain the highest standards of conduct in our dealings with vendors, customers, fellow employees, and members of the public. All employees have a shared responsibility to conduct business in alignment with the standards set out by the Corporation, and to the best of their knowledge and within reason, ensure that they are dealing with outside partners who uphold compatible ethical, legal, and professional standards.

Ethical Conduct

Environmental and social responsibilities

Employees shall exercise their responsibilities in a manner that promotes and provides opportunities for the protection and preservation of the natural environment. Employees shall favour the use and distribution of resources in an efficient, effective, and ethical manner. Employees will be cognizant of the social rights extended to all people, including the conventions of the International Labour Organization with respect to labour standards, and will encourage and support supplier diversity.

Serving the public good

Employees shall use their position to advance the interests and well-being of society; to denounce all forms of business practice which may compromise value or bring discredit to the organization and/or society.

Legal and Professional Conduct

Compliance with legal obligations

Employees shall be aware of and comply with (a) all laws, regulations, by-laws, and standards that are relevant to supply chain management practices; (b) the Corporation's rules and regulations; and (c) contractual obligations that apply to the employee or the Corporation and both the letter and spirit of the Competition Act. Employees must not engage in or condone any activity or attempt to circumvent the clear intention of the law.

The Company's policy manual outlines expected behaviors, code of conduct violation repercussions, and detailed reporting requirements for any employee who becomes aware of any illegal or unethical behavior in violation with the Company's policies.

❖ The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk:

The Company may engage in risk assessment and/or verification measures where it deems appropriate to evaluate and address risks of forced labour or child labour in connection with our supply chain, including

possible site visits and independent third-party audits (announced or unannounced) to ensure compliance with contractual obligations and our Company code of conduct standards.

❖ **Measures taken to remediate any forced labour or child labour:**

Throughout our business transactions during the financial reporting period, the Company has not discovered any suspicious conduct in contravention of forced labour or child labour laws.

❖ **Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains:**

Throughout our business transactions during the financial reporting period, the Company has not discovered any suspicious conduct in contravention of forced labour or child labour laws.

❖ **Training provided to employees on forced labour and child labour:**

All existing employees are provided with a corporate policy employee manual outlining expectations of ethical and legal conduct, and reporting procedures in cases where there is a suspected breach of ethical and/or legal conduct, either within the Company or in dealings with external clients or suppliers.

Additionally, the Company has identified external training resources for employees which will be administered in the upcoming financial reporting period.

❖ **How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains:**

During the financial reporting period, the Company began developing strategies to assess its effectiveness in identifying and preventing forced labour and child labour within its supply chains.

❖ **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 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.

Timothy J. Frith
CEO



Signature: _____ **Date:** May 28, 2024