

VENTURA FOODS CANADA ULC

BILL S-211 REPORT

**An Act to enact the Fighting Against Forced Labor and Child Labor in Supply
Chains Act and to amend the Customs Tariff**

For the fiscal year ended March 31, 2025



May 28, 2025

Ventura Foods Canada ULC: Bill S-211 Report

Introduction

Ventura Foods Canada ULC (“VFC”) is a Canadian food manufacturing and distribution company. VFC is a wholly owned subsidiary of Ventura Foods, LLC (“Ventura Foods”). This statement is made on behalf of Ventura Foods, VFC, DYMA Brands, Inc. and its and their subsidiary companies.

Ventura Foods, VFC and its subsidiaries (together, the “Company”) are committed to ethical sourcing and conducting business in adherence with the highest standards of integrity, responsibility and ethical behaviour. The Company complies with the laws and regulations of all the jurisdictions in which it does business worldwide. We take human rights seriously and require everyone we do business with, including our suppliers, contractors, agents, and consultants throughout our supply chain, to demonstrate the same high ethical standards.

We are committed to protecting the human rights of our employees and all those connected to our supply chain. Our Health and Safety commitment also extends to our suppliers. We expect them to prohibit harassment and promote strict workplace and food safety policies and procedures.

All suppliers are expected to adhere to our company’s Supplier Code of Conduct, which includes provisions of the Ethical Trading initiative Base Code, an internationally recognized code of labor practice:

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labor shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided.
- No harsh or inhumane treatment.

The Company sources a variety of raw materials for the production of manufactured products, most of which are global commodities that are generally readily available from a variety of suppliers and brokers. For further information on the Company’s Corporate Structure and a Description of the Business, please see the Company’s websites: www.venturafoods.com and www.venturafoods.ca.

Structure, Activities and Supply Chain

Ventura Foods is a limited liability company headquartered in Brea, California, United States of America. Ventura Foods and VFC employ over 4,000 employees. Ventura Foods is a privately held joint venture between Mitsui & Co. and CHS Inc.

Addressing Child Labor and Forced Labor

Our [Supplier Code of Conduct](#) sets forth our interest in working with suppliers that take corporate social responsibility seriously and outlines the framework for our procurement practices, including choosing suppliers that prohibit child labor and any form of forced labor and who take reasonable measures to prevent such practices in their operation or supply chains.

The Company’s [Code of Conduct](#) articulates the principles that being treated with dignity and respect is a

basic human right, and forced labor, child labor, and substandard working conditions are prohibited in our supply chain. It is our policy that we will not knowingly do business with anyone who participates in these forms of labor.

Employees of the Company, business partners, or other third parties may report unethical or improper conduct that may violate Ventura Foods' Code of Conduct or Supplier Code of Conduct through the ethics hotline, which is available online or by telephone. Concerns of possible violations of law, the Code of Conduct, or the Supplier Code of Conduct are investigated, and appropriate corrective measures, as deemed necessary, are taken to address concerns.

The Company's [Corporate Social Responsibility Annual Report](#), shares how our company invests in its people and communities, responsibly sources and manufactures its products, and protects the environment.

The aforementioned Codes of Conduct and Annual Report are located at www.venturafoods.com.

New, direct suppliers are subject to a standard due diligence process and a pre-contract screening that is intended to assist in identifying forced and child labor risks in their supply chains. To date, we have not identified any forced labour or child labour in our activities and supply chains and have also not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. We also assess the effectiveness of the steps we have taken to prevent forced labour and child labour in our activities and in our supply chains by monitoring concerns raised through the reporting entities' ethics hotline.

The Company is committed to engaging in employment practices that meet all ethical and legal standards, including laws and regulations related to forced and child labor, in the markets in which it operates. Similar to its internal commitment to preventing child labor and forced labor, the Company expects its suppliers to share and uphold these same commitments across their business operations as well. Further, the Company expects its suppliers to cascade these expectations through their supply chains – including to raw material, component, or ingredient suppliers.

Forced Labor

All workers across the Company's operations and in our suppliers' operations, must work under voluntary conditions. The Company and its suppliers will not use any form of forced or involuntary labor, including prison labor, indentured labor, bonded labor, military labor, slave labor or any form of human trafficking.

Child Labor

The use of child labor that contravenes local labor laws within the Company's operations or by the Company's suppliers is strictly prohibited. Management is responsible for ensuring that child labor does not occur at any of the Company's locations and managing the risk of child labor in the Company's supply chain relationships.

Governance, Accountability and Remediation

The Company has internal policies including its Supplier Code of Conduct and Code of Conduct that further reinforce and clarify its commitments to responsible labor practices, including preventing the use of forced labor and child labor. The Company's governance structure ensures that its policies related to forced and child labor are effective.

The Company's Operations

The Company's executives, management teams and all employees are required to review and acknowledge the Company's Code of Conduct on a regular basis. Violations of the Company's policies will result in the Company taking effective remedial actions, such as disciplinary actions up to and including termination.

The Company assesses risks of forced labor or child labor across its supply chain, and determines priorities based on areas of highest risk. While the Company's operations predominantly reside in North America, its complex supply chain extends globally. Since labor practices (including forced and child labor) can vary significantly by geographic location, industry and business activity, the Company continually assesses and monitors its own operations, and its supply chain partners to mitigate and manage these risks.

The Company's Suppliers

In 2018, the Company formalized and introduced its Supplier Code of Conduct. Under the Supplier Code of Conduct, the Company reserves the right to monitor and verify compliance. This may include information requests to validate conformance and/or on-site visits or inspections. Suppliers must report any known or suspected breaches of the Supplier Code of Conduct and may require corrective action(s) to ensure compliance. Where possible, the Company will work with suppliers in violation of the Supplier Code of Conduct to develop and implement a plan for remediation. However, if a supplier is either unwilling or fails to make necessary changes to their practices, the Company may cease its relationship with that supplier.

Governance

The Company has several mechanisms in place to ensure compliance with its policies and to continue mitigating the risk of forced and child labor being used in the Company's operations and supply chains.

The Company's Internal Audit Department carries out regular audits and assessments of the Company's operating businesses on a variety of measures. The team also conducts on-site visits to the Company's operating businesses to ensure compliance and identify areas for improvement. The Internal Audit Department reports directly to the Company's Audit Committee of the Board of Directors, who oversee the management of the Company's key business risks and concerns.

Additional oversight is provided at the senior executive level by the Company's Corporate Responsibility Committee ("CRC") comprised of the General Counsel and Board of Directors. The Company's CRC provides oversight of the Company's Corporate Social Responsibility ("CSR") Report. Further, the Company's Compliance Committee is comprised of the Company's General Counsel and executives from various disciplines and leaders from across its businesses. The Company's Board of Directors oversees all aspects of its Ethics and Compliance Program, including oversight of the Company's referenced policies.

Additionally, the Company has a Whistleblower Policy and Ethics Hotline where any concerns or issues of non-compliance or questionable practices can be reported, without fear of reprisal.

Training and Awareness Building

In 2024, the Company continued to build on its ethical business practices, including key human rights considerations, by focusing on further awareness, engagement and knowledge building across the Company's businesses. The Company also initiated a project to improve its understanding of specific due diligence processes, and to monitor the Company's current practices. The Company's findings from this project will be used to create additional programs and best practices to mitigate associated risks in the Company's business and supply chains.

The Company also continues to explore traceability systems to monitor its supply chains. The Company's Supplier Code of Conduct encourages increased transparency and values alignment with the Company's suppliers, inclusive of standards relating to forced and child labor. The Supplier Code of Conduct establishes clear protocols for cases of non-compliance and demonstrates the Company's commitment to collaborating with its suppliers on conflict resolution through corrective actions and/or potential remediation measures. The Supplier Code of Conduct has been implemented by the Company and the procurement teams are in the process of tracking its adoption rate with their supply chain partners.

Measuring Risk Effectiveness and Remediation

Our human rights impact assessments focus on two main areas for the Company: 1) our corporate operations, and 2) our supply chain.

The Company has a comprehensive program for employee reporting of suspected Code of Conduct violations, if an employee believes they have experienced or witnessed a wrongdoing in the workplace. This includes a reporting process if the employee is comfortable reporting the issue internally, and an independent third-party reporting mechanism if the employee prefers to remain anonymous. As a principle, to the fullest extent possible, investigations are conducted in a confidential manner and made without fear of retaliation.

We take a risk-based approach to supply chain management and continually take steps to assess, monitor, mitigate, report, and promote work toward human rights due diligence with our suppliers.

Any potential modern slavery misconduct or concerns are appropriately dealt with under the terms and provisions of the Company's Employee Handbook, the Company's Code of Conduct, and the Company's Supplier Code of Conduct.

The Company has grievance mechanisms to report and address breaches of relevant policies, laws, or codes through different methods. All grievances are investigated and acted upon, where deemed necessary. Grievance reports of a significant nature, procedures, investigations and results are recorded and reported to the Company's Board of Directors on a regular basis.

In addition to formal policies, we understand the importance of taking a collaborative approach to addressing human rights issues, as we believe that human rights are inherent and fundamental to all persons. As indicated, the Company has strong programs, policies and remediation processes in place to protect our employees from human rights abuses in the workplace and have identified our business practices and direct operations as being low risk for modern slavery and/or human rights abuses. Therefore, in addressing modern slavery, we prioritize supplier engagement, particularly with relevant Tier 1 suppliers, through direct engagement, formal meetings, and through recognized industry associations and certification bodies. Our work to prevent human rights abuses within our supply chains involves many levels of our organization and those of our suppliers, across multiple functions involved in

the supply chain. This is designed to promote feedback and input from our stakeholders, while collaborating on best practices and opportunities for improving transparency across our supply chain.

The Company is committed to continuous improvement in promoting and supporting human rights within our Company and throughout our supply chain. We understand the importance of taking a collaborative approach to addressing human rights issues and regularly assess the effectiveness of our policies, due diligence actions and industry engagement to manage modern slavery risks.

Summary

The Company remains committed to preventing child labor and forced labor within the Company's operations and by its suppliers. The Company is committed to engaging with its employees, suppliers and stakeholders on these concerns and continues to fortify its approach to reducing the risks associated with forced or child labor in the Company's business and supply chains, while ensuring compliance with applicable labor laws.

For more information on the Company's Supplier Code of Conduct, Code of Conduct, Corporate Social Responsibility Annual Report, Whistleblower Policy and Ethics Hotline as referenced, please see the Company's website (www.venturafoods.com). To learn more about the steps the Company is taking to further its commitments to Responsible Sourcing, please see the Company's Corporate Social Responsibility report on the Company's website (www.venturafoods.com).

Reporting entity's legal name:	Ventura Foods Canada ULC
Financial reporting year:	Fiscal Year-Ended March 31, 2025
Joint report for the following entities:	Ventura Foods Canada ULC Ventura Foods, LLC

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.

I have the authority to bind Ventura Foods Canada ULC

Date: May 28, 2025



Rebecca J. Walsh
Director