Fighting Against Forced Labour and Child Labour in Supply Chains

Statement

JD Sweid Foods (2013) Ltd.

(“JD Sweid Foods”)

Fiscal 2023

May 13, 2024

Forced Labour and Child Labour Statement, F2023

Modern slavery exists in various parts of the world, affecting millions of men, women, and children. It is a grave violation of human rights and a complex issue that requires coordinated efforts from governments, law enforcement agencies, civil society organizations, and communities to address effectively. As Canada confronts the scourge of modern slavery, it must remain steadfast in its commitment to upholding human dignity and fundamental rights for all. By raising awareness, fostering collaboration, and prioritizing the needs of victims, the society can work towards a future where every individual is free from the chains of exploitation and oppression. This includes taking actions in order to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Act").

At JD Sweid Foods we acknowledge we have a responsibility in playing a role in eradicating modern slavery. JD Sweid Foods believes in the fair treatment and remuneration of employees. JD Sweid Foods is committed to operating in accordance with the highest ethical standards, outlined in our Code of Business Conduct and Ethics, employment and all applicable laws, rules and regulations. The Company is obliged to promote equal opportunities standards at the workplace, foster prevention of any discrimination practices, including prohibiting forced-labour and child-labour.

JD Sweid Foods is committed to providing a healthy and safe workplace that is free of any form of harassment or violence and strives to protect employees' safety, health and wellbeing

JD Sweid Foods has set up its compensation and renumeration system which is in line with provincial legislation.

JD Sweid Foods developed the expectations for how its management team should relate to one another including how we employ people and abide by applicable laws and regulations.

JD Sweid Foods seeks to do business with suppliers, vendors, and contractors that have similar values, ethics and sustainable business practices, including those related to human rights. JD Sweid Foods expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

This Modern Slavery Statement relates to our actions and activities for the JD Sweid Foods (2013) Ltd. full completed financial year from July 1, 2022, to June 30, 2023. and complies with the mandatory reporting requirements for modern slavery statements in line with the Modern Slavery Act.

David Pickrell

President

JD Sweid Foods (2013) Ltd.

Mandatory Reporting Criteria

Requirement

1. Identification of the reporting entity
2. JD Sweid Foods reporting structure, operations and supply chains
3. Description of modern slavery risks in JD Sweid Foods operations and supply chains
4. Description of actions taken by JD Sweid Foods, Governance and Due Diligence
5. Effectiveness of these actions
6. Consultation process
7. Other relevant information

1. Identification of the reporting entity

This statement relates to the responsibilities of JD Sweid Foods (2013) Ltd. It ensures that the company follows similar policies and procedures to undertake effective steps to identify and remove contemporary slavery.

2. JD Sweid Foods's reporting structure, operations, and supply chains

Structure

JD Sweid Foods (2013) Ltd. is a privately owned company and a leading manufacturer of further processed poultry, beef and pork products from its 2 facilities in Canada. Our products are sold and distributed across Canada in both the foodservice and retail markets. JD Sweid Foods sources its goods and services from suppliers predominately in Canada. Our main ingredients are poultry, beef, pork, packaging, ingredients, and consumables.

With over 350 full time employees, JD Sweid Foods plays a vital role in the fully cooked and par fried poultry product supply to the retail and foodservice channels. Being one of the largest poultry further processors in Canada, JD Sweid Foods brings an approach to food safety and quality, which is based on a philosophy that goes well beyond the products we make. We strive to bring a safety and quality orientation to everything we do.

Operations and supply chains

JD Sweid Foods sources its goods and services from suppliers which predominately consists of butchered poultry, beef and pork, packaging, dry / other ingredients, and consumables. Some of the services we access are for cleaning, freight, waste management, network and communications to name a few. The majority of our suppliers are based within Canada, however there is a small minority of goods that are sourced from overseas.

At JD Sweid Foods, we source all of our raw materials from reputable, licensed producers to ensure our products are of the highest quality and standard.

The JD Sweid Foods website at https://jdsweid.com/ will provide you with a greater understanding of the business, our products and people and the areas we operate and customers we supply.

Predominately our operation consists of:

Further Processing and Distribution:

JD Sweid Foods has two further meat processing plants located in Langley, British Columbia, and Waterloo, Ontario, and produces primarily poultry products, but also beef and pork products.

3. Description of modern slavery risks in JD Sweid Foods's operations and supply chains

Operations

At JD Sweid Foods we consider that we are a low risk of modern slavery practices as we have no operations outside of Canada.

The vast majority of employees employed by JD Sweid Foods are employed directly. JD Sweid Foods employees are treated fairly, equitably and remunerated in line with the corresponding provincial legislation. JD Sweid Foods fair compensation awards cover key areas including wages, hours of work, overtime conditions, additional remuneration, and leave entitlements. For more senior positions, they are engaged under the terms of a common law contract, which is well above the minimum conditions. All employees remain subject to at least the minimum conditions in the corresponding provincial Employment Standards Act, which is regularly reviewed. These conditions are supported by a range of policies and procedures providing additional benefits. JD Sweid Foods's employment practices comply with the human rights, applicable federal and provincial laws within Canada.

Our recruitment processes are strongly supported by JD Sweid Foods's policies and procedures. Employment decisions are made on the principle of merit, with no instances of forced labour. All employees are required to demonstrate their legal right to work in Canada and proof of age. For those employees who hold authorized work permits, JD Sweid Foods regularly checks to ensure that an employee's work permit is still valid and any other limitations that may be placed on their work permit.

Supply Chains

JD Sweid Foods sources its products and services predominately from within Canada with minimal products coming from overseas.

JD Sweid Foods maintains a high ethical standard across its operations. It's our policy to ensure that the ethical standards that apply within our own business are also adhered to in our supply chain. The identification of risk within our supply chain is a key initial step in understanding what's required and prioritising actions.

While JD Sweid Foods predominately sources goods and services from within Canada, there are most likely inherent risks further down the supply chain. There may be situations where services or products supplied to JD Sweid Foods by an organisation doesn't breach any modern slavery requirements, however if the organisation sourcing the products is getting them from overseas, this could be identified as a potential risk. An example could be the purchase of electronic equipment. JD Sweid Foods may be purchasing from a reputable supplier within Canada, however the item or components may be manufactured and produced overseas where modern slavery practices may be breached.

At JD Sweid Foods we operate a Supplier Approval Program which incorporates Food Fraud Vulnerability Self Assessment and Food Defense & Food Fraud Plan. While these tools are predominately food protection focused and used to mitigate food fraud/tampering, the current questionnaire has been reviewed and updated for 2024 to

ensure all suppliers and service providers are providing feedback relating to their compliance with the human right, federal and provincial legislations and laws, and if they have an policy in pace prohibiting forced labor, or child labor in their operations and supply chain.

4. Description of actions taken by JD Sweid Foods, Governance and Due Diligence

RISK	ISSUE	ACTION
In the last fiscal year (Jul'22 – Jun'23), JD Sweid Foods has not started risk identification job. In the current fiscal year (Jul'23 – Jun'24) based on the brief analysis of actual activities JD Sweid Foods sees the potential risk mostly associated with the supply chain: some of the dry spice ingredients, which are imported by Canadian supplier, but grown overseas with the different legislation and employment practices.	Possible risks may be: • Forced-labour or Child-Labour is used to grow, crop or manufacture. • Below minimum wages paid. • Unsafe work conditions.	Corporate suppliers will receive a letter from JD Sweid Foods which will outline third party requirements with regard to modern slavery.

Operations

JD Sweid Foods seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. JD Sweid Foods expects the organisations it deals with to have ethical workplace practices, where staff are treated fairly, equally and remunerated in accordance with the law.

JD Sweid Foods has certain policies in place to assist in ensuring that modern slavery is not taking place in its business or operations. An example of such policies is:

- **Recruitment Policy and Procedures**: all recruitment and selection procedures and decisions will reflect JD Sweid Foods' commitment to providing equal opportunity by assessing all potential candidates according to their skills, knowledge, qualifications and capabilities. The Company aims to provide challenging, meaningful, and rewarding opportunities for personal and professional growth of all employees without regard to race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation or age or any other legally protected status.
- **Health & Safety Policy and Procedures:** all employees undergo orientation training to ensure they understand all hazards and risks that they may encounter during employment. We perform yearly refreshers of safety training, as well as monthly toolboxes, and special toolbox presentations to continue to ensure all employees' health, safety and wellbeing.

- **Harassment and Violence Policy:** JD Sweid Foods is an equal opportunity employer and is committed to providing a harassment, bullying, and retaliation free workplace where all people are treated with dignity, courtesy, respect, and fairly on the basis of individual merit.

5. Effectiveness of these actions

Our policies define the standards of behaviour expected of all associated with JD Sweid Foods, including suppliers. These policies set out JD Sweid Foods' expectations of how representatives should relate to one another including how we employ people and abide by current employment laws, and also our expectations of suppliers.

6. Consultation process

JD Sweid Foods has involved its key management teams – Operations, Quality Assurance and Human Resources, in order to prepare and complete this Statement.

7. Other Relevant Information

While JD Sweid Foods is confident that as a result of all of the external audits conducted at JD Sweid Foods' facility we meet the modern slavery and human right act requirements for our immediate business operations, there is still some work that needs to be done across all of our suppliers in the supply chain area. This includes:

- Continued improvement of our education processes to ensure all employees are trained and aware of JD Sweid Foods' commitment to ensure social wellbeing and accountability.
- Continued improvement of our Supplier Approval Program to define the ethical and business standards expected from all JD Sweid Foods suppliers.
- Implementing the Supply Chain Code of Conduct and updating JD Sweid Foods Code of Business Conduct and Ethics to reflect the evolving needs of current Act.
- Introducing a tool to raise a concern / complaint to the JD Sweid Foods management regarding compliance of JD Sweid Foods operations and its supply chain with the current act requirements.

By focusing on the above, this will ensure that we as a business are reasonably confident that the suppliers, we source our goods and services from, are compliant with the requirement of Fighting Against Forced Labour and Child Labour in Supply Chains Act.