



**JD Sweid Foods (2013) Ltd.
("JD Sweid Foods")**

**Report Pursuant to the
Fighting Against Forced Labour and Child
Labour in Supply Chains Act
Fiscal 2025 (July 1, 2024-June 29, 2025)**

May 27, 2026

FORCED LABOUR AND CHILD LABOUR STATEMENT, F2025

This report is published by JD Sweid Foods (2013) Ltd. (“JD Sweid Foods”) pursuant to the Fighting Against *Forced Labour and Child Labour in Supply Chains Act* (the “Act”). It describes the measures taken by JD Sweid Foods during the financial year July 1, 2024 to June 29, 2025 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by the Company, or in the production of goods imported into Canada by the Company.

Forced labour and child labour are serious violations of human rights that undermine human dignity and fundamental freedoms. JD Sweid Foods recognizes that businesses have a responsibility to respect human rights and to play a role in addressing risks of forced labour and child labour within their operations and supply chains. This report reflects our commitment to responsible business conduct and to complying with the requirements of the Act.

At JD Sweid Foods, respect for human rights is fundamental to how we operate. Our activities are guided by our core values of teamwork, integrity, performance-driven excellence, and solution-oriented thinking, which inform our decision-making and our relationships with employees, suppliers, customers, and the communities in which we operate.

JD Sweid Foods complies with applicable federal, provincial, and local employment laws and is committed to respecting internationally and federally recognized human rights across our operations and supply chains. We believe in the fair treatment and lawful remuneration of workers and are committed to providing a workplace that is safe, respectful, and free from forced labour, child labour, discrimination, harassment, or violence. Our compensation and employment practices are aligned with applicable legislation, and we set clear expectations for management to uphold legal and ethical obligations.

We also seek to work with suppliers, vendors, and contractors that share our commitment to ethical and lawful business practices. We expect our business partners to maintain fair, safe, and transparent working conditions, to treat workers with dignity and respect, and to comply with applicable laws relating to employment and human rights.

This report outlines JD Sweid Foods’ structure, activities, and supply chains, as well as the policies, due diligence processes, and measures in place to identify, assess, and mitigate risks of forced labour and child labour. It also describes our approach to monitoring effectiveness and our commitment to continuous improvement, in accordance with the Act.

This report was approved by the governing body of JD Sweid Foods (2013) Ltd. in accordance with the requirements of the Act.



David Pickrell
President
JD Sweid Foods (2013) Ltd.

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1. IDENTIFICATION OF THE REPORTING ENTITY

This report is published by JD Sweid Foods (2013) Ltd. (“JD Sweid Foods”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). It describes the measures taken by JD Sweid Foods during the financial year July 1, 2024 to June 29, 2025 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by the Company, or in the production of goods imported into Canada by the Company.

Forced labour and child labour are serious violations of human rights that undermine human dignity and fundamental freedoms. JD Sweid Foods recognizes that businesses have a responsibility to respect human rights and to address risks of forced labour and child labour within their operations and supply chains.

This report is made in accordance with section 11 (1) of the Act and describes the measures taken by JD Sweid Foods during its Fiscal 2025 financial year to prevent and reduce the risk that forced labour or child labour is used in its operations or at any step in its supply chains, including the structure, policies, due diligence processes, risk areas, remediation measures, training, and effectiveness assessment.

2. JD SWEID FOODS’ REPORTING STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Structure

JD Sweid Foods (2013) Ltd. is a privately owned Canadian company operating in the food manufacturing sector. The Company is engaged in the further processing of poultry, beef, and pork products for distribution across Canada through both retail and foodservice channels.

JD Sweid Foods operates two production facilities located in Langley, British Columbia, and Waterloo, Ontario. The Company employs over 400 full-time employees across its operations.

Operations

JD Sweid Foods’ primary operations consist of the further processing, cooking, packaging, and distribution of meat products, with a focus on fully cooked and par-fried poultry products, as well as select beef and pork products. These activities are conducted in Canada and are subject to applicable federal and provincial food safety, labour, and employment regulations.

Supply Chains

JD Sweid Foods sources goods and services from third-party suppliers to support its operations. Suppliers are primarily located in Canada, with a limited portion of goods sourced from international suppliers to meet specific operational or product requirements.

Key supply chain categories include:

- Protein supply (butchered poultry, beef, and pork)
- Packaging materials
- Dry and other ingredients and consumables
- Industrial and plant services (including maintenance, repair, sanitation, and waste disposal)
- Corporate and business services (including telecommunications and travel)

In addition to directly employed personnel, JD Sweid Foods engages a limited number of third-party labour service providers to support certain operational requirements.

JD Sweid Foods sources raw materials from licensed and reputable suppliers and expects suppliers to comply with applicable laws and regulations. The Company recognizes that risks related to forced labour and child labour may be present in certain supply chains and jurisdictions and addresses these risks through its governance and due diligence measures, as described in subsequent sections of this report.

Additional information regarding JD Sweid Foods' business operations and products is available at <https://jdsweid.com/>.

3. POLICIES AND DUE DILIGENCE PROCESSES

JD Sweid Foods has established policies, procedures, and due diligence practices designed to promote ethical business conduct and compliance with applicable labour and human rights legislation, including measures to prevent and reduce the risk of forced labour and child labour in its operations and supply chains.

Internal Policies

JD Sweid Foods maintains an internal policy framework that supports lawful, ethical, and responsible employment practices. This framework includes

- A Code of Business Conduct and Ethics
- Recruitment and employment policies
- Health and safety programs
- Harassment and violence prevention policies
- Reporting mechanisms, including protections against retaliation

These policies apply to all employees, contractors, management, and directors. They are supported through onboarding processes and ongoing awareness activities to reinforce expectations related to ethical conduct, compliance with applicable laws, and respect for human rights.

Oversight of these policies and due-diligence processes is supported by JD Sweid Foods' Senior Leadership Team, with operational responsibility shared across relevant functions, including Procurement, Human Resources, and Operations.

Supplier and Vendor Due Diligence

JD Sweid Foods maintains a Supplier Code of Conduct that sets expectations relating to ethical business practices, compliance with applicable laws, and respect for human rights, including labour standards. The Supplier Code of Conduct was implemented prior to the reporting period and continues to apply to relevant suppliers.

While the majority of the Company's workforce is directly employed, JD Sweid Foods utilizes a limited number of third-party labour service providers. These labour suppliers are subject to an annual assessment process, which includes the completion of a questionnaire intended to assess alignment with applicable labour and employment requirements, including those related to the Act.

To support risk identification and mitigation, JD Sweid Foods operates a Supplier Approval Program, which includes a Food Fraud Vulnerability Self-Assessment and Food Defense and Food Fraud Plans. While these tools are primarily focused on food safety and integrity, as of May 2024, additional questions were incorporated into supplier assessments to support alignment with the principles of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. Information collected through this process is reviewed as part of supplier approval and validation activities, with oversight by senior management.

Suppliers and service providers are requested to provide information regarding compliance with applicable human rights, labour, and employment laws, including whether they maintain policies that prohibit the use of forced labour or child labour within their operations and supply chains. Where potential supply-chain risks are identified, JD Sweid Foods may request additional information or documentation and, where appropriate, escalate concerns through available contractual or commercial mechanisms.

4. DESCRIPTION OF MODERN SLAVERY RISKS IN JD SWEID FOODS'S OPERATIONS AND SUPPLY CHAINS

Operations

Based on the nature and location of its operations, the structure of its workforce, and the policies and due diligence processes described in Section 3, JD Sweid Foods assesses the risk of forced labour and child labour within its direct operations to be low.

The vast majority of individuals working for JD Sweid Foods are directly employed by the Company in Canada and are subject to applicable federal and provincial employment and human rights legislation. Employees are remunerated in accordance with employment standards legislation, including requirements related to wages, hours of work, overtime, additional remuneration, and statutory leave entitlements. Employees engaged in more senior roles are employed under common-law employment arrangements that meet or exceed applicable minimum standards.

Recruitment and hiring practices are merit-based and governed by internal policies. JD Sweid Foods requires employees to demonstrate their legal right to work in Canada and provide proof of age. Where employees hold work permits, the Company verifies ongoing validity and any applicable restrictions. These practices support the Company's assessment that the risk of forced labour and child labour within its direct operations is limited.

Supply Chains

JD Sweid Foods sources goods and services predominantly from Canadian suppliers, with a limited portion sourced internationally. The Company recognizes that risks of forced labour and child labour may arise at certain stages of global supply chains, particularly where goods or components originate from jurisdictions with differing regulatory environments and labour enforcement standards.

JD Sweid Foods' assessment of supply-chain risk takes into account the supplier governance and due-diligence processes described above, including supplier approval, information requests, and escalation mechanisms. These processes support the identification and prioritization of potential risks of forced labour and child labour within the Company's supply chains, particularly where goods or components may originate from outside Canada.

JD Sweid Foods applies a risk-based approach, focusing enhanced attention on supplier categories that may present elevated risk, including third-party labour service providers and suppliers sourcing goods from jurisdictions with differing labour standards.

5. DESCRIPTION OF ACTIONS TAKEN BY JD SWEID FOODS, GOVERNANCE AND DUE DILIGENCE

JD Sweid Foods undertakes ongoing governance and due diligence activities to identify, assess, and mitigate risks of forced labour and child labour within its operations and supply chains. During the reporting period, no confirmed instances of forced labour or child labour were identified. However, JD Sweid Foods identified certain **areas for improvement**, which inform the actions described below.

Supply-Chain Monitoring and Risk Mitigation

Based on an analysis of procurement activities conducted during the prior fiscal year, JD Sweid Foods identified a potential area of risk related to the sourcing of certain dry spice ingredients. While these products are imported by a Canadian supplier, they originate from jurisdictions where labour and employment standards may differ from those in Canada. Potential risks associated with such sourcing may include forced labour or child labour, sub-standard wages, and unsafe working conditions further upstream in the supply chain.

In response, JD Sweid Foods issued a Vendor Requirements and Supplier Code of Conduct statement, setting out expectations regarding ethical business conduct and alignment with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. No misconduct was identified during this process. However, JD Sweid Foods recognizes that upstream risk may still exist and will continue to monitor this category as part of its risk-based approach.

Going forward, JD Sweid Foods intends to continue monitoring this category of suppliers, engaging with them as needed, and seeking additional information where appropriate to support ongoing due diligence.

JD Sweid Foods expects suppliers to comply with applicable labour and employment laws and to maintain policies prohibiting forced labour and child labour. Supplier alignment with these expectations is considered during onboarding and ongoing review.

Labour Service Provider

During the reporting period, JD Sweid Foods conducted due-diligence activities related to its third-party labour service providers. As part of this process, the Company issued its labour-supplier questionnaire to all labour service providers supporting operational departments across both production facilities. A total of nine (9) providers were requested to complete the questionnaire, and eight (8) completed responses were received and reviewed.

One labour service provider did not submit a completed questionnaire or the requested supporting documentation despite follow-up communications. This limited JD Sweid Foods' ability to assess alignment with applicable requirements and was identified as a potential risk indicator, prompting additional scrutiny.

Following escalation and review in accordance with the Company's procedures, JD Sweid Foods took appropriate contractual action, including discontinuing the use of the labour service provider where

necessary. This outcome demonstrates that JD Sweid Foods' due-diligence and escalation processes are functioning as intended to identify and address higher-risk suppliers.

JD Sweid Foods Employment Transparency

As part of JD Sweid Foods' ongoing efforts to increase transparency and strengthen oversight of labour practices within its operations, the Company has committed to further enhancing its due-diligence framework through independent assessment.

In support of this objective, JD Sweid Foods has scheduled a third-party SMETA four-pillar audit to be conducted at both of its production facilities. The results of this audit will be used to inform JD Sweid Foods' risk assessment and to identify corrective actions, where appropriate, in order to further strengthen alignment with the Act.

Reporting and Transparency Mechanisms

JD Sweid Foods maintains multiple reporting mechanisms to ensure concerns can be raised effectively by employees, contractors, suppliers, and their workforce. Issues may be reported directly to a supervisor, manager, HR or the President, either verbally or in writing, and may also be reported anonymously.

In addition, JD Sweid Foods provides an online reporting channel through the Compliance page of its corporate website to support accessible and confidential reporting. Information received through these mechanisms is used, where appropriate, to inform risk assessments and due-diligence activities under the Act.

6. REMEDIATION MEASURES

While no confirmed instances of forced labour or child labour were identified in JD Sweid Foods' operations or direct supply chain during the reporting period, JD Sweid Foods recognizes that remediation may be required where suppliers are unable to demonstrate compliance with legal and ethical standards.

The termination of the labour supplier relationship described above was undertaken as a preventative remediation measure to reduce potential risk and uphold JD Sweid Foods' obligations under the Act and its Vendor / Supplier Code of Conduct.

JD Sweid Foods did not identify any loss of income to vulnerable individuals or families resulting from measures taken to eliminate forced labour or child labour during the reporting period.

JD Sweid Foods will continue to assess remediation requirements on a case-by-case basis where potential non-compliance is identified.

Where risks are identified, remediation may include corrective action plans, increased monitoring, supplier engagement, or termination of the relationship, depending on severity.

These actions are intended to prevent potential exposure to forced labour or child labour and to maintain alignment with applicable legal and ethical obligations.

7. EFFECTIVENESS OF ACTIONS

JD Sweid Foods assesses the effectiveness of its actions through a combination of governance oversight, operational monitoring, and supplier engagement.

Effectiveness indicators include:

- Supplier acknowledgment and engagement with the Supplier Code of Conduct
- Completion of onboarding and awareness training
- Due-diligence outcomes for suppliers and labour providers
- Accessibility and use of reporting mechanisms
- Escalation outcomes where non-compliance is identified

The identification of a labour service provider's inability to demonstrate compliance, and the subsequent termination of that relationship, demonstrate that JD Sweid Foods' due-diligence framework is effective in identifying higher-risk suppliers and enabling appropriate corrective action.

The planned SMETA audit further supports JD Sweid Foods' commitment to independent verification and continuous improvement.

8. EMPLOYEES TRAINING

JD Sweid Foods provides ongoing training for all new hires that includes awareness of the Fighting Against Forced Labour and Child Labour in Supply Chains Act and the Company's related policies and expectations. During the reporting period, 345 hourly employees, including 84 new hires, received this training.

9. CONTINUOUS IMPROVEMENT AND FORWARD-LOOKING COMMITMENTS

JD Sweid Foods is committed to ongoing improvement and intends to:

- Further embed the Supplier Code of Conduct into supplier onboarding and review processes.
- Enhance supplier risk categorization and validation tools.
- Expand effectiveness metrics for due-diligence activities.
- Continue strengthening employee and supplier awareness.

10. APPROVAL AND ATTESTATION

Oversight of forced labour and child labour risk management is supported by JD Sweid Foods' Senior Leadership Team, with operational responsibility shared across Procurement, Human Resources, and Operations.

JD Sweid Foods stands firm in our commitment to advancing human rights, acting with integrity, behaving responsibly and treating people with respect in all areas of our operations and within our supply chain. We will continue to collaborate with our partners, customers and suppliers to enforce a broader due diligence framework and protection against any forced or child labour.

The Senior Leadership Team has reviewed this report and has exercised reasonable diligence in ensuring that the information contained in this report is accurate, complete, and reliable in all material respects for the purposes of the Act.