



# **MAPLE LEAF FOODS INC.**

Report Pursuant to the Fighting Against  
Forced Labour and Child Labour  
in Supply Chains Act (“Modern Slavery Act”)

Fiscal Year 2024

## 1. Introduction

Maple Leaf Foods is a leading protein company, committed to Raising the Good in Food. Our dedication to better nutrition, safer food and workplaces, an equitable and inclusive workforce, humane animal care, and advancing sustainability helps us build a better future together.

Advancing social responsibility, compliance, and human rights within our operations and supply chain is fundamental to our mission and is demonstrated through our Values and actions. We firmly condemn all forms of forced labor and child labor and hold ourselves to the highest standards. We expect our directors, officers, team members, suppliers, and subsidiaries to act with integrity and comply with the laws, regulations, and rules applicable to Maple Leaf Foods in the jurisdictions where we operate.

Through the enforcement of our Code of Business Conduct and Supplier Code of Conduct, supported by Social Compliance and Responsibility oversight, we are committed to protecting, preventing, and reducing any instances and risks of forced or child labor.

This report is prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) for Maple Leaf Foods Inc. and its subsidiaries, which have an obligation to publish a report under the Act (collectively, “Maple Leaf Foods” or the “Company”). This report highlights the steps taken during our previous fiscal year ending December 31, 2024, to prevent and reduce the risk of forced labor or child labor within our operations and supply chain.

## 2. Steps taken to prevent and reduce risks of forced labour and child labour

Maple Leaf Foods firmly opposes any form of forced labor, which involves coercing individuals to work under threat or penalty without their voluntary consent. This includes prison labor, bonded labor, indentured labor, or trafficked labor. We follow the guidelines of the International Labour Organization (ILO) Fundamental Principles and Rights at Work, the Ethical Trade Initiative (ETI) base code, and local legislation.

Additionally, we do not condone any form of child labor. Our policies and processes strictly prohibit the employment of individuals below the legal minimum age in the jurisdictions where we operate. Within our supply chain, we hold our business partners and suppliers to the same high standards, expecting them to comply with applicable human rights and employment standards laws.

In 2024, MLF has taken the following steps to prevent and reduce the risk that forced labour or child labour is used within our own operations and within our supply chain.

- Annual review of the terms of the Code of Business Conduct
- Annual compliance certification for the Code of Business Conduct by salaried team members
- Annual compliance certification for the Respect in the Workplace policy by salaried team members
- Conducted “The Way We Work” deep dive discussions on each Leadership Value with frontline team members and developing action plans in 2025 to sustain awareness
- Completion of multiple independent social compliance audits across our Canadian and US operations
- Annual review of the terms of the Supplier Code of Conduct
- Analysis and preparation to implement enhanced Supplier Attestations in 2025
- Advancing of our social compliance due diligence program with governance, roadmap and strategic framework
- Engaging an independent third party to conduct a human rights impact assessments in our Canadian (including Temporary Foreign Worker) and US Operations

### 3. Structure, activities and supply chain

#### **Structure**

Maple Leaf Foods has a vision to be the most sustainable protein company on earth, responsibly producing food products under leading brands including Maple Leaf®, Maple Leaf Prime®, Maple Leaf Natural Selections®, Schneiders®, Schneiders® Country Naturals®, Mina®, Greenfield Natural Meat Co.®, Lightlife® and Field Roast™. We employ approximately 13,500 people, of which approximately 8,000 are covered by collective agreements. Our operations are primarily in Canada, and we have three facilities and an Innovation Centre in the United States. We also have small representative or sales offices in Japan, South Korea, Philippines and China. The Company is headquartered in Mississauga, Ontario and its shares trade on the Toronto Stock Exchange (MFI).

#### **Activities and Supply Chain**

From an operational perspective, we have a combination of agricultural operations (pork and poultry), primary food processing facilities and further prepared foods processing facilities. We sell the food we manufacture through retail, food service and industrial channels. We rely on many suppliers for our animals, ingredients, indirect goods and services. Our supply chain involves purchasing a broad range of goods and services, largely from Canadian and North American sources.

We are deeply committed to the highest standards of respect and integrity in our business relationships and activities. These standards apply within our organization and our expectations of our suppliers and contractors. We follow a fair sourcing process whenever possible while managing our supply chain effectively, and we identify, assess and monitor areas in our supply chain where there may be a risk of forced labour or child labour.

### 4. Policies and due diligence processes in relation to forced labour and child labour

In 2024, we continued to advance our Social Compliance Program with a mandate to intensify our efforts in identifying, preventing, and mitigating risks related to forced and child labor across our operations and within our supply chain. Through collaborations with our customers, suppliers, and industry partners, we have undertaken initiatives that support the prohibition of these practices.

#### **Code of Business Conduct**

Our Values and Code of Business Conduct serve as our operational framework and accountability model, ensuring all employees adhere to the highest standards of ethical, moral, and legal business conduct. Maple Leaf Foods does not condone any activities by team members that violate the law or engage in unethical practices, including forced labor and child labor. Any such violations can be reported through management, Human Resources, or our EthicsLine—a confidential hotline managed by a third-party service provider. All reported violations are reviewed, assessed and investigated. Findings are reported to the Ethics Committee and any findings are addressed through the implementation of Maple Leaf remedial steps. The Human Resources and Compensation Committee of the Board of Directors regularly receives reports on culture and conduct matters, including reports to our EthicsLine and violations of our Code of Business Conduct.

#### **Supplier Code of Conduct**

Our suppliers must uphold the human rights of all workers and treat them with dignity and respect, as outlined by recognized international labor standards. This obligation applies to all workers, including temporary, migrant, student, contract, direct employees, and any other categories. We

expect our suppliers to commit to the following labor practices, ensuring controls are in place throughout their supply chain and subcontractors:

- Ensure that employment is freely chosen and forced, bonded, indenture or trafficking employment shall not be used
- Prohibit child labour in any circumstance
- Working hours will comply with local laws
- Compensation paid to workers shall comply with all applicable wage laws
- Commit to a workplace free of harassment, violence and discrimination
- Allow for the freedom of association

We encourage our suppliers to exceed mere legal compliance by adhering to internationally recognized standards when they are more demanding. This approach aims to promote social and environmental responsibility, as well as business ethics. Compliance with our Code should never result in the violation of local laws. However, when there are differences between the Maple Leaf Foods' Supplier Code of Conduct and local laws, we expect our suppliers to meet the more stringent of the two requirements.

### ***Additional Policies and Frameworks***

Maple Leaf Foods maintains robust human resources policies and procedures, as well as an extensive occupational health and safety program to support its social compliance efforts. Our policies not only meet but often exceed applicable local and national laws wherever we operate. They are deeply rooted in our Values and ethical standards and guided by recommended international principles such as the United Nations' Guiding Principles on Business and Human Rights and International Labour Organization Conventions.

## **5. Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk**

Maple Leaf Foods recognizes that some elements of our supply chain present a risk of forced labour or child labour. The ways we identify and manage this risk include:

- Applying our Code of Business Conduct and Supplier Code of Conduct
- Enforcing our purchasing, human resources and occupational health and safety policies
- Engaging with our team members, Unions, suppliers, customers and other stakeholders as a way of identifying risk or non-compliance
- Completing reviews of supplier operations and practices as part of our supplier assessment program prior to supplier selection
- Conducting social compliance risk assessments and reviews
- Requiring potential violations of our Code of Business Conduct or Supplier Code of Conduct to be reported
- Offering a confidential, anonymous EthicsLine for reporting concerns which is managed by a third-party agent, investigating concerns that are raised and actioning the outcomes from the investigations as appropriate
- Reporting any social compliance risk as part of our sustainability materiality assessment

This past year, we conducted third-party social compliance audits at 11 manufacturing facilities and completed human rights impact assessments at our Brandon, Manitoba operations (including the foreign worker program) and our Indianapolis, Indiana operations. These efforts will help us continually improve our policies and processes as needed and prioritize our ongoing efforts to avoid contributing to adverse human rights impacts through our business activities. We are also committed to preventing and mitigating any adverse impacts to which we may become directly linked through our supply chain.

6. Any measures taken to remediate any forced labour or child labour

There have been no identified or reported instances of forced labour or child labour in our activities and supply chain.

7. Remediation of 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

There have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

8. Training provided to employees on forced labour and child labour

The annual certification of our Code of Business Conduct ensures that our salaried team members are aware of and trained on our Code of Business Conduct, our Values, and several supporting human resource and safety policies. This is reinforced by values training programs and communications through our employee communications platform, OneLeaf.

Within our supply chain, suppliers are required to review our Supplier Code of Conduct, which is widely published and incorporated into our purchase orders and contract templates. Suppliers are expected to certify their compliance with the Supplier Code of Conduct annually and report any non-compliance promptly.

As part of our Social Compliance program in 2024, we initiated the assessment of a more robust training program that includes ways to identify, prevent, and mitigate forced or child labor. We anticipate a broader roll-out of the training program in 2025.

9. Effectiveness assessments to ensure that forced labour and child labour are not being used in its business and supply chains

To reduce and prevent the risk of forced labour and child labour within our operations and supply chain, we assess the effectiveness of our actions.

Activity	Measuring Effectiveness
<b>Governance</b>	Human Resources and Compensation Committee of the Board receives quarterly ethics reporting and Safety and Sustainability Committee of the Board receives quarterly occupational health and safety reporting  Social Compliance audit reporting scorecard that is published to the Social Compliance Internal Committee  Annual content review of the Code of Business Conduct and Supplier Code of Conduct Annual required sign-off by salaried team members on the Code of Business Conduct Values training and certification program for salaried team members Training and participation in “The Way We Work” program for frontline team members Supplier screening and assessment as part of onboarding new suppliers and periodic certification by suppliers with respect to adherence to the Supplier Code of Conduct
<b>Engagement</b>	Engage with our customers and suppliers on social compliance matters within our network and our supply chain to share standards and best practices

<b>Risk Management</b>	Sustainability materiality assessments refreshed periodically to reach a broad cross section of stakeholders to assist in identification of potential social compliance issues Ethics compliance and reporting concerns processes
<b>Monitoring</b>	Supplier screening Social Compliance Due Diligence Assessments and Audits Ethicsline Reporting (Internal and Supplier) and tracking of any complaints through daily, weekly and quarterly reporting Periodic Supply Chain Audits as appropriate Targeted Human Rights Impact Assessments as appropriate (priority on higher risk areas) Monitoring media reports related to risk of forced or child labour and actioning as required

## 10. Conclusion

Maple Leaf 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 Industry Partners, customers and suppliers to enforce a broader due diligence framework and protection against any forced or child labour.

## 11. Approval and Attestation

This report was approved by our Board of Directors on February 24, 2025.

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.

***(“Signed M.H. McCain”)***

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Michael H. McCain  
Executive Chair, Maple Leaf Foods Inc.  
February 24, 2025  
I have authority to bind the Corporation.