

**PREMIUM FOODS & ADP DIRECT POULTRY**  
*and Associated Companies*

**BILL S-211 REPORT**

**"An Act to enact the Fighting Against Forced Labor and Child Labor in Supply Chains Act"**

**For the fiscal year ended October 31, 2024**

## **Commitment to Human Rights and Responsible Labour Practices**

ADP Direct Poultry Ltd., Bonte Foods Ltd., Simple Path Farms Poultry Ltd., and all associated entities (hereafter "the Company") are fully committed to ensuring that all operations adhere to the highest ethical standards. We continuously monitor and update our policies to address emerging risks and enhance our commitment to the protection of human rights, particularly preventing forced labor and child labor across our global supply chain.

This commitment includes operating in compliance with all applicable labor laws, including new requirements under **Bill S-211 (Modern Slavery Act)**, the **United Nations Guiding Principles on Business and Human Rights (UNGPs)**, and regional human rights frameworks. Forced labor and child labor have no place in our operations or the supply chains that support our business.

### **Addressing Child Labor and Forced Labour**

- 1. Child Labor:**
  - The Company remains steadfast in its prohibition of child labor in any form that violates local or international labor laws.
  - All employees, across our operations and those of our suppliers, must be employed voluntarily, and are entitled to work in conditions that are free from coercion or exploitation.
- 2. Forced Labor:**
  - We will not tolerate any form of forced labor, which includes involuntary work under threat of penalty or coercion, prison labor, indentured labor, bonded labor, military labor, or human trafficking.
  - Our supply chain partners are required to ensure that their operations are free from any form of forced labor.

### **Structure and Supply Chain**

#### **Headquarters and Operations:**

- The Company remains 100% Canadian-owned and is headquartered in Etobicoke, Ontario.
- Our primary sourcing materials (poultry, beef, and pork) continue to come from a global network of suppliers.
- Given the evolving international labor standards, we have updated our monitoring mechanisms to ensure greater transparency and compliance throughout our supply chain.

#### **Global Supply Chain Risk Assessment:**

- With our supply chain spanning across multiple regions, we regularly assess labor-related risks in each region, based on the International Labour Organization (ILO) and local government standards.
- In addition to traditional audits, we have expanded our monitoring to include gender-based violence prevention, health and safety improvements, and anti-discrimination policies for all workers in the supply chain.

### **Accountability and Remediation**

#### **Internal Accountability:**

- The Company's management, including executives and senior leadership, continues to review and sign off on our Code of Business Conduct on an annual basis, reinforcing our commitment to preventing forced and child labor.
- We have strengthened our internal audit processes to include not just labor conditions but also environmental sustainability and corporate social responsibility (CSR) practices, ensuring our efforts align with broader global sustainability goals.

**Supplier Approval and Remediation Program:**

- The Supplier Approval Program now incorporates more detailed questionnaires and a specific Human Rights Due Diligence (HRDD) framework that aligns with international best practices and national laws (e.g., Modern Slavery Act (UK), California Transparency in Supply Chains Act, EU Due Diligence Regulation).
- We have enhanced supplier monitoring with third-party certification programs (e.g., Fair Trade Certified, SA8000, and Ethical Trading Initiative (ETI)), ensuring our suppliers meet rigorous labor standards.
- Suppliers must complete an annual Modern Slavery Risk Assessment, as outlined in Bill S-211, and submit a Human Rights Impact Assessment (HRIA) for high-risk suppliers.

**Remediation:**

- If a breach is identified, we will work directly with the supplier to create a Corrective Action Plan (CAP). Should the supplier fail to act or remedy the situation in a reasonable time frame, the Company reserves the right to sever the business relationship, in accordance with our updated Supplier Termination Policy.

**Whistleblower Policy and Reporting Mechanisms**

- We have expanded our Whistleblower Policy to include more robust reporting mechanisms, where employees, contractors, or suppliers can report suspected violations, including forced or child labor, without fear of retaliation.
- In line with International Labour Organization (ILO) conventions and national whistleblower protections, all reports are investigated promptly, and corrective actions are taken where necessary.

**Training and Awareness Building**

- We are committed to ongoing **training programs** designed to educate all employees, management, and suppliers on recognizing and addressing **forced labor and child labor risks**. These training sessions are being integrated into our overall **Sustainability and Ethical Procurement Training**.
- Key topics include:
  - **Human Trafficking and Modern Slavery Awareness**
  - **Employee Rights and Labor Protections**
  - **Supplier Social Responsibility and Legal Compliance**
  - **Anti-Discrimination, Anti-Harassment, and Gender Equality**.
- We are also working to integrate **digital tools** that will enable real-time monitoring and feedback from suppliers, improving communication and compliance tracking in the supply chain.

**Annual Policy Review and Ongoing Commitment**

- The Company remains committed to a continuous process of **policy review and risk assessment** to ensure the effectiveness of its practices. Annual updates are conducted to ensure that we remain in full compliance with all evolving labor laws, including **newly updated international frameworks and regional legislation**.
- We also actively participate in industry-wide forums and initiatives related to **corporate responsibility**, including the **UN Global Compact** and the **Ethical Trading Initiative (ETI)**.

## Conclusion

ADP Direct Poultry Ltd. and its associated companies continue to be committed to the protection of human rights and the eradication of forced and child labor across our operations and supply chains. As part of this commitment, we will maintain transparency, accountability, and continuous improvement in all our business practices.

Reporting entity's legal name:	ADP Direct Poultry Ltd
Financial reporting year:	Fiscal Year-Ended October 31, 2024
Joint report for the following entities:	Bonte Foods Ltd. Simple Path Farms Poultry Ltd.

*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 ADP Direct Poultry Ltd.

Date: June 24, 2025

Signed 

Augusto Pinho  
President