



## **Child Protection and Forced Labour (Modern Slavery) Due Diligence Policy and Code of Conduct Statement**

At Ritchie Smith Feeds, we strongly value and support human rights and fundamental freedoms. We commit to respect and promote education on those rights and freedoms, and to prevent modern slavery (child and forced labour) in our operations. We commit to using our best endeavours to ensure that our business partners do the same. This includes compliance with the regulations as set out in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* of Canada, and other guidance publications from appropriate world organizations such as the United Nations.

To that end, we will not partake in or condone the employment or exploitation of any person below the legal working age in our business operation. We will abide by the laws as set out by Labour Canada and the Province of British Columbia. We will have zero tolerance for forced labour or any kind of physical punishment, abuse or involuntary servitude of any worker. This policy applies to all business and non-business related activities over which Ritchie Smith has operational control. Where we are not the operator, we will seek to influence our suppliers and partners so that they adopt similar commitments, policies and codes of conduct.

### **Objective:**

- To ensure all employees at Ritchie Smith Feeds are
  - voluntarily employed
  - meet the required minimum age as set out by applicable labour laws
  - paid at or above minimum wage as set out by the Province of British Columbia
- To encourage all partners in our supply chain to adhere to the same standards as applicable
- To treat all employees and supply chain partners with respect and fairness

### **Modern slavery is defined as:**

- Child labour – services provided or offered to be provided by persons under the age of 18 that:
  - Are contrary to applicable Canadian labour laws
  - Are mentally, physically, socially or morally dangerous to them
  - Interfere with their schooling activities
- Forced labour – services provided or offered to be provided by a person under circumstances that
  - Cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide said service
  - Constitute forced or compulsory labour
  - Results in the person being unpaid or undercompensated

**Persons Responsible:** Board of Directors, Management, Director of Purchasing, Purchasing Department, Programs Coordinator

### **Procedure:**

1. All positions of employment at Ritchie Smith Feeds (RSF) are posted on a public job or union board and are open to any individual who wants to apply. All employees will voluntarily agree to join the company and must be of legal working age.
2. All employees are paid wages that are at or above the minimum wage as set out by the Province of BC. Manufacturing wages are determined by the Collective Bargaining Agreement as negotiated with the International Union of Operating Engineers (IUOE) Local 115. Additionally, health and retirement benefits are offered by RSF to all permanent employees.
3. Students between 15 and 18 years of age may be temporarily hired from time to time (i.e. for the summer or as a work/study internship.) They will be paid wages that are at or above the minimum wage as set out by the Province of BC and the hours of work will not interfere with their education. Such employment will abide by all applicable labour laws, regulations and guidelines.

## **GMP Section 7: Receiving, Storage, and Transportation**

Ritchie Smith Feeds Inc.

4. All suppliers of ingredients and other products to RSF will sign the Supplier Approval Questionnaire and/or sign the affidavit on the bottom of the Supplier Information Form July 2024 stating that they do not employ modern slavery methods in their organizations or in their supply chains. (See GMP Section 7. Receiving and Storage, forms and SOP 7.01 Ingredient Procurement Supplier SOP.)
  - a. A risk assessment will be done on all companies that RSF purchases directly from. Companies that are located in countries that have been identified as engaging in modern slavery will be prioritized and assessed more closely than those that are located in countries known to have laws preventing these work practices.
  - b. A risk assessment will be done on all at-risk ingredients that have been identified as commonly being produced using modern slavery. The higher the risk, the more stringent the risk assessment will be.
5. Programs Coordinator will keep updated relevant information on modern slavery including global statistics and maps as available to ensure risk assessments are done on suppliers from countries that are noted to manufacture products using modern slavery methods. The Approved Supplier List will remain updated at all times.
6. Persons responsible as noted above will be trained in what modern slavery is, which countries are most at risk for employing modern slavery practices and which products are most at risk for being produced using modern slavery. Guidelines from various organizations are kept in the Forced Labour Act folder and can be referenced by persons responsible on demand.

### **Deviation:**

RSF will not knowingly purchase goods or deal with companies that engage in any labour practices using modern slavery. Alternate suppliers and goods will be sourced if modern slavery concerns are substantiated.

### **Verification:**

Standard Operating Procedures are reviewed and updated on an annual basis to ensure they are current.