

Bill S-211 Annual Report Forced Labour and Child Labour Act

Financial Year 2024

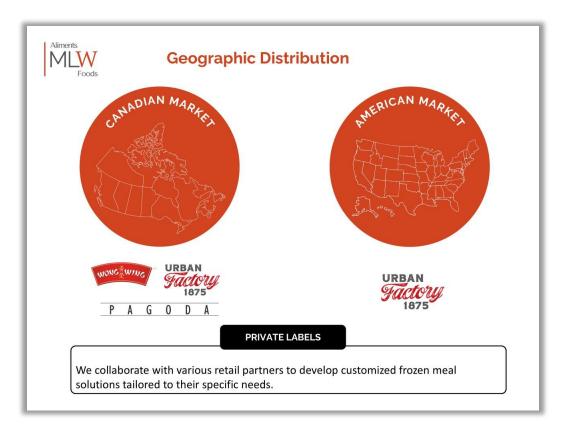


INTRODUCTION

MLW Foods Inc. is a privately held company that owns and operates the Wong Wing facility, originally founded in 1948 in the heart of Montreal's Chinatown and now located on Bercy Street in Montreal. We are leaders in the food processing, distribution and marketing of Asian-style frozen products and fusion flavours such as snacks/appetizers (rolls, egg rolls, dumplings, wontons), as well as complete meals, rice and noodle sides and soup. Our Wong Wing and private label products are distributed across Canada in both retail and foodservice channels under the Wong Wing, Urban Factory 1875 and Pagoda brands and in the United States under Urban Factory 1875. The number of employees at MLW Foods Inc. varies between 200 and 250. This report is for the reporting period of July 2, 2023, to June 29, 2024.

OVERVIEW OF OPERATIONS AND SUPPLY CHAIN

This document provides an overview of MLW Foods Inc., a North American leader in the transformation, distribution and marketing of modern Asian and fusion foods, including its history, values, product offerings, and market positioning. Our products are primarily sold within Canada, with additional distribution in the US market.



PROCUREMENT

Our operations rely on a supply chain of products and services, including agricultural items like chicken, pork, beef, vegetables, oil, flour, eggs, spices, and more. In FY24, the largest portion of our spending was on meat products, mainly sourced from over five contracted suppliers in Canada and the USA. Other ingredients and packaging materials were obtained from more than 80 suppliers and distributors, primarily in Canada and the US. Furthermore, any finished goods that we don't produce ourselves are sourced from Canadian manufacturers and made in Canada.



HUMAN RIGHTS AT MLW FOODS

MLW Foods compiles with all applicable local laws and regulations, including the provisions outlined in Bill S- 211. We do not endorse, support or engage in any form of forced labour or child labour within our organisation or within our supply chain. We strive to ensure that all employees and suppliers meet these standards, and we will address any instances of non-compliance.

Respect for human rights is a fundamental value at MLW Foods that is reflected throughout our policies, procedures and activities. We recognize the inherent worth of every individual, and we strive to create an inclusive, equitable and diverse work environment where all people are treated with fairness and respect. Discrimination, prejudice, harassment or violence in any form is not tolerated. MLW Foods upholds human rights in its relationships with employees, customers, suppliers and other business partners, and we expect them to share our commitment and avoid causing or contributing to any human rights infringements. We are committed to working with suppliers and business partners that do not engage in human trafficking, child labour, forced labour or any form of slavery.

GOVERNANCE OF FORCED LABOUR

We will put in place designated departmental representatives at MLW Foods to oversee and coordinate the implementation of anti-slavery and forced labor measures in the most efficient manner. These representatives are supported by members of human resources, strategic procurement, executive members, a representative from the operations team which helps guide efforts to reduce risks within the supply chain and operations.

SUPPLIER ASSESSMENT

As part of the supplier assessment process, MLW Foods is taking steps to prevent and reduce the risk of forced labor or child labor. We are in the process of developing a **Policy to Combat Forced Labour and Child Labour.** Additionally, our suppliers will be required to complete a sustainability self-assessment questionnaire. This questionnaire includes questions regarding policies that ensure adherence to local human rights and employment laws.

Furthermore, MLW Foods Supplier Code of Conduct governs the actions of its partners and suppliers drawing upon standards in human rights. The Supplier Code of Conduct serves to extend our culture of integrity to our supply chain and sets the expectations required from our suppliers and their vendors. This principles-based code is aligned with our core values and sets out our expectations of suppliers to ensure their behaviour meets MLW Foods standards in key areas, such as business integrity, responsible business practices and responsible treatment of individuals. The Supplier Code of Conduct will include provisions on human rights, health and safety matters and ethical behaviours. We will expect that suppliers do not engage in any form of child or forced labour, modern slavery or human trafficking. Remedial action may include termination of the relationship.



MANAGING SUPPLIER CONTRACTS

MLW Foods. upholds standard procurement terms and conditions for transactional matters. Contracts will be adapted and revised, as appropriate, to mitigate forced labour and child labour risks. If a supplier is found to be in violation of the terms outlined in their contract, including those related to compliance with the MLW Supplier Code of Conduct, corrective action will be taken, which may include suspension or termination of the contract with that supplier.

We take any breach of the MLW Supplier Code of Conduct, or any other breach involving a risk to human rights, seriously, addressing it promptly and with the goal of reducing or removing the risk altogether.

ACTIONS WE TAKE TO ASSESS AND ADDRESS RISKS

We strive to take appropriate measures to protect and promote human rights for our employees while also mitigating the risk of modern slavery and human trafficking in our operations, either directly or through our service providers.

As part of our due diligence process, we will evaluate potential suppliers through a self-assessment questionnaire before entering into contracts.

Regarding employment practices and workforce rights, MLW Foods maintains a robust human resource recruiting process, minimizing the risk of forced labour or child labour among our personnel. Newly hired employees undergo an onboarding training program designed to familiarize them with MLW Foods' policies, procedures, and operational programs. MLW Foods offers tools for individuals to report situations that may involve legal violations in human rights or harassment within our operations.

RISK MAPPING AND DUE DILIGENCE

We will assess and work to enhance our processes by implementing customized practices aimed at identifying and reducing the risks of child labor in our operations and supply chain.

MLW Foods is committed and will implement proactive measures to mitigate the risks of forced labor by:

- Establishing clear supplier expectations through the distribution of our Supplier Code of Conduct and completing self-assessment questionnaire.
- Focusing on our direct supply chain to identify and address medium to high-risk suppliers.
- MLW Foods will periodically assess compliance with the policy. We will focus on conducting onsite visits to our suppliers identified as high risks
- Ensuring that all MLW Foods employees are properly onboarded and employed in compliance with applicable laws.
- Ensuring that all MLW Foods recruitment agencies will complete the questionnaire and adhere to the Supplier Code of Conduct
- Ensuring no person under the legal working age, as defined by federal and provincial laws, shall be employed by the company.
- Adequate documentation will be maintained to prove workers' age. Any discrepancies or concerns regarding age verification are promptly addressed.
- Background or reference checks are conducted for new hires.



CHANNELS FOR REPORTING FORCED LABOUR VIOLATIONS

MLW Foods Inc. offers all employees and external third parties' various confidential channels for reporting potential violations. This helps detect and prevent misconduct, while also safeguarding whistleblowers and the company from potential harm. These channels include:

- Reporting via email at <u>LabourAct@mlwfoods.com</u>
- Human Resources Representative
- Manager or Supervisor
- Procurement Representative
- Members of the Executive team

Information on possible violations can be given confidentially and anonymously. MLW Foods does not tolerate retaliation against complainants or whistleblowers and any attempt at retaliation is treated as a compliance violation. The Human Resources department at MLW Foods reviews and investigates relevant reports, provides findings to the executive team, and collaborates to take appropriate action in accordance with established company policies and legal requirements.



APPROVAL AND ATTESTATION

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chairman and CEO, MLW Foods Inc. attest that I have reviewed the information contained in the report on behalf of the governing body of the entity MLW Foods Inc. 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 within this report.

I have the authority to bind MLW Foods Inc.



Tony Galasso Chairman and CEO, MLW Foods Inc.

Date: May 29, 2025

