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2023 Modern Slavery Compliance Report

1. Introduction:

This compliance report is provided by Conestoga Meats Ltd. (“Conestoga” or the “Company” or “our” or “we”) for the financial year ending April 26, 2024 (the “Reporting Period”) and sets out steps taken to prevent and reduce the risk that forced labour is used at any step of the production of goods in Canada or of goods supplied and/or imported into Canada by the Company.

This report constitutes the first report prepared by the Company pursuant to Canada’s new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). The Company is not subject to reporting requirements under any other applicable legislation.

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

We consider the respect of human rights to be a fundamental corporate responsibility and our value of “People First” governs all our activities. We place the highest importance on respecting human rights while conducting our business activities in all the countries that we operate and expect the same of our business partners.

We have taken the following steps during the Reporting Period to prevent and reduce the risk of forced labour and child labour in our business and supply chains:

- Reviewed and updated our Supplier Agreement in January 2024 to include our expectations of activities around Child and Forced Labour
- Conducted a preliminary initial internal assessment of the risks of forced labour and/or child labour in our supply chains to enhance our supplier Third-Party due diligence process
- Conducted mandatory Human Rights & Respectful Workplace Training
- Introduction of Child/Forced Labour and Human Trafficking Policies

Details of the above actions are outlined in this Report.

3. Structure, activities and supply chains

Conestoga Meat Packers Ltd. was founded in 1982 and began processing farm fresh pork. In 1994 Progressive Pork Producers was formed and all farmers are land-based operators growing the crops that feed the hogs that they produce. In 2001 Progressive Pork



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Producers purchased Conestoga and became fully farmer-owned. Conestoga is now a thriving Co-operative owned by approximately 157 farmers.

Headquartered in Breslau, Ontario, Conestoga Meats provides premium pork products domestically and abroad.

We have one manufacturing facility (Breslau, ON) and one distribution center (Cambridge, ON). Currently, we employ close to 1500 employees. All sales and marketing of the Company's products are provided through its head office in Breslau, ON.

Conestoga's global supply chain consists of product suppliers, providing production and safety materials, and are procured from suppliers located around the world. Conestoga seeks long-term relations with major direct and indirect suppliers for the delivery of materials and the majority of suppliers are local to Ontario. We have undertaken mapping activities to identify any high-risk suppliers.

4. Policies, Governance and Due Diligence processes

4.1 Conestoga is committed to embedding human rights considerations into its policies, governance framework and decision making.

Human Rights Statement

To support our commitment to upholding human rights, our Business Code of Conduct reiterates our position to not use child or forced labour. We expect all employees, at all levels, as well as our business partners, to act accordingly.

4.2 Code of Ethics ("the Code")

Conestoga Meats has a Business Code of Conduct that applies to all members of the Conestoga community, including the Board of Directors, management and employees at every level and in every location.

The Code addresses ethical conduct in our work environment, business practices and relationships with external stakeholders. The principles set out in the Code of Conduct reflect Conestoga's belief that honesty and integrity foster a positive work environment that strengthens the confidence of all stakeholders. The Code details the standards of behaviour expected from everyone to whom it applies in their daily activities and in dealings with others. It outlines the key responsibilities of Conestoga leaders who are to provide a model of high standards of ethical conduct and to create a work environment



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reflecting both the content and the spirit of the Code. Our Code requires us to uphold our core values, our standards of behaviour and applies at all times without exception to all members of the Board of Directors and all employees at every level in the organization.

4.3 Supplier Code of Conduct

In line with Conestoga's vision for its suppliers, Conestoga actively engages its supply chain by the adherence to its "Conestoga Meat Packers Ltd. Terms and Conditions." These were last updated in January 2024 and details our expectations of suppliers in respect of human rights, labour and legal compliance.

Our Terms and Conditions specifically include provisions prohibiting child and forced labour, as follows

"Child Labour Policy. The use of child labour by Supplier is strictly prohibited. Suppliers are prohibited from using workers under the legal age of employment for the type of work in the country where the Supplier performs work for the Purchaser. If the country in which the Supplier is doing business does not define "Child" for purposes of minimum age of employment, the minimum age of employment shall be 15 years of age, and the employment of any individual in the production of or supply of Goods and/or Services for the Purchaser below that age is strictly prohibited. If local law allows the minimum age of employment to be 14 years of age or younger, the minimum age of employment shall be 14 years of age, and the employment of any person below that age in the production of or supply of Goods and/or Services for the Purchaser shall be strictly prohibited. In either situation, minors between the age of 14 and 16 may only be employed to work and only be permitted to work during periods of time when they are not required by law to attend school (except as may be permitted under apprenticeship or other similar programs in which the minor is lawfully participating). Suppliers shall ensure that their subcontractors comply with this policy for employees working on Goods and/or Services supplied to the Purchaser. The Purchaser reserves the right at its sole discretion to carry out periodic unannounced inspections to verify compliance with these standards."

4.4 Reporting and Non-Retaliation Policy

In accordance with our Confidential Reporting System, should employees have concerns regarding forced or child labour, they have the responsibility to report their suspicions. To that effect, Conestoga provides multiple channels for them to report any potential breach, on a confidential basis or not, such as reporting

- To colleagues, including supervisors, human resources representatives or any level of management



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- Through the Confidential Reporting System drop boxes, by submitting an anonymous concern/complaint

5. Assessing and managing our risk

Conestoga uses a risk-based approach to assess and manage its risk of forced labour and child labour. Our approach helps us prioritize and adjust our actions. Our methodology to identify risks in our supply chain combines country risk indicators, supplier category and type of product/service offered by the supplier. Further restrictions and rules around our risk assessment will continue to be developed.

6. Remediation Measures

Our Confidential Reporting System offers a reporting mechanism for our employees to report ethical or legal violations, among other concerns. To date, we have not identified any situations which required mitigation.

7. Training

Conestoga's employees receive regular tailored training on ethical topics and our policies. All new salary hires are assigned a mandatory onboarding training package which includes training on our Business Code of Conduct. On an annual basis, all salaried employees are required to certify their adherence to our Business Code of Conduct.

In 2024, Conestoga intends to provide training to targeted audiences that will include child and forced labour.

8. Assessing effectiveness

Conestoga has in place a number of measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. While we have not yet taken any actions to assess the effectiveness of those actions, Conestoga intends to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains at a later stage.

9. Approval and Attestation

This report was approved pursuant to the Board of Directors of Conestoga Meat Packers Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the



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information in this report is true, accurate and complete in all material respects for the purpose of the Act, for the reporting year listed above.

I have the authority to bind Conestoga Meat Packers Ltd.

Per: William Peters

Full Name: William Peters

Title: Chairman of the Board

Date: May 24, 2024