



Modern Slavery Act Compliance Policy

OBJECTIVES

At Primo Foods Inc. (“we”, “us”, “our” or “ours”), we believe in acting as a reputable corporate citizen. We are committed to conducting all of our business activities in a socially responsible and sustainable manner. As a manufacturer, seller, distributor and importer of goods in Canada, Primo Foods must comply with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, Ch. 9 (the “Modern Slavery Act”). Participating in this, Primo Foods contributes to Canada’s international commitment to combat forced labour and child labour. This policy sets out our obligations under the Modern Slavery Act. This policy should be read along side the Supplier Code of Conduct.

APPLICABILITY AND SCOPE

This policy applies to Primo Foods Inc. a business that is listed on a stock exchange in Canada or have a place of business in Canada, do business in Canada or have assets in Canada and, based on their consolidated financial statements, meet at least two of the following conditions for at least one of their two most recent financial years:

- a) have at least \$20 million in assets,
- b) have generated at least \$40 million in revenue,
- c) employ an average of at least 250 employees.

POLICY

Due Diligence in Supply Chains

In the context of our activities, we must ensure that the goods we manufacture, sell, distribute and import do not result from the use of forced labour or child labour. We must continue to conduct due diligence on our suppliers and implement mitigating measures when the risks are high. We must also make sure that our suppliers conduct their own due diligence regarding the use of forced labour or child labour within their own supply chains.

When our due diligence reveals a **high risk** of forced labour or child labour being used, we must take mitigation measures. This might include, without limitation, implementing an accountability system and/or regular verifications of compliance with the Modern Slavery Act.

When our due diligence detects a possible breach of the Modern Slavery Act or any other applicable modern slavery legislation, we must: a) immediately notify the CEO of Primo Foods Inc., who will analyze the situation and make recommendations; b) if necessary, conduct any additional verification, including site visits and inspections; c) implement corrective measures; and d) follow up thereon in a timely manner.

If there is a serious breach involving a supplier and no corrective measure is possible or sufficient, we must immediately terminate any contractual relationship with the supplier in question. In accordance with the Supplier Code of Conduct, each supplier must notify Primo Foods Inc. immediately if it becomes aware or suspects the use of modern slavery (including, without limitation, forced labour or child labour) in its business operations or supply chains, including the scope and impact of such modern slavery on the supplier's business relationship and contract(s) with Primo Foods Inc. Each supplier must immediately notify Primo Foods if it or any of its representatives become the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of modern slavery laws (including reporting laws, due diligence laws, criminal laws, etc.).

TRAINING

Compliance with the Modern Slavery Act and this policy is everyone's responsibility. The relevant employees of Primo Foods Inc. must complete any training offered by Primo regarding the identification and mitigation of forced labour and child labour risks.

Annual Report

Every year, Primo reports to the Minister of Public Safety and Emergency Preparedness (the "Minister") on the actions taken during the previous financial year to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods, in Canada or elsewhere, or of goods imported into Canada.

The report must also include information about Primo and:

- our structure, commercial activities and supply chains;
- our policies and due diligence processes in relation to forced labour and child labour;
- the parts of our business and supply chains that carry a risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk;

- any measures we have taken to remediate any forced labour or child labour;
- any measures we have taken to remediate the 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 our business and supply chains;
- the training provided to our employees on forced labour and child labour; and how we assess our effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains.

The Minister also has the discretion to impose specifications on the form and manner in which our reports are to be provided.

Sending and Publication of Annual Report

The annual report must be sent to the Minister by May 31 every year.

Finally, each report must be made available in a prominent place on our website

Verification by the Minister

The Minister has substantial investigative powers as regards the administration and enforcement of the Modern Slavery Act. A person designated by the Minister may, for the purpose of verifying compliance with the Modern Slavery Act, enter any place, including the facilities of Primo Foods if they have reasonable grounds to believe there is anything to which the Modern Slavery Act applies or any document relating to the administration of the said act.

The CEO and the Vice-President must be promptly informed in the event of a verification by a person designated by the Minister. Those in charge of the place being verified and every person in that place must give all assistance that is reasonably required to enable the designated person to exercise their powers or perform their duties or functions and are to provide any documents, information or access to any data that is reasonably required for that purpose.

APPLICATION AND OVERSIGHT

Corporate Human Resources of Primo Foods Inc. is responsible for the administration of this policy, together with the executive health and safety committee. Other individuals may be designated for the purposes of supervising the implementation of this policy. Reports on compliance with this policy are, whenever necessary, presented to the Corporate Human Resources of Primo Foods Inc. Human Resources must, in all circumstances, be informed of any significant breach of this policy and of any termination of a contractual relationship with a supplier relating to this policy.

Approval and Execution of Annual Reports

Every report prepared in accordance with this policy must be approved by Corporate Human Resources from Primo Foods, upon the recommendation of the Health and Safety Committee, before being sent to the Minister. It must be executed by a member of the Human Resources team.

Reporting breaches Anyone who witnesses a breach of this policy or of the Modern Slavery Act is strongly encouraged to report such conduct using the contact information below:

- ➔ **Lou Macera** - Corporate Human Resources 519-326-9033 x 273
- ➔ **Matthew Farias** - Plant Manager 416-741-9300 x 313
- ➔ **Sonja Battaglia** - Human Resources 416-741-9300 x 314