

This report, prepared by the leadership of Rustica Foods Inc. for the fiscal year ending November 30, 2023 (the "Reporting Period"), outlines the measures Rustica Foods Inc. has taken to prevent, reduce, and address the risks of modern slavery, forced labor, and child labor in the production of goods that Rustica Foods Inc. imports or sells. Rustica Foods Inc. recognizes the ethical, legal, financial, and reputational risks associated with these practices and is dedicated to working with suppliers who prioritize ethical and sustainable business operations.

This is Rustica Foods Inc. first report in compliance with Canada's Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").

Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act)- Report 2023

Rustica Foods Inc. Group Structure

Rustica Foods Inc. has a rich professional history in food production, transportation and warehousing.

We take pride in our Company Code of Conduct on Combating Child Labor and Forced Labor in Supply Chains. In summary, to support this important initiative, our Code of Conduct contains the following:

1. Prohibition of Child Labor

- Our company strictly prohibits the use of child labor.
- No person under the legal working age (as defined by federal and provincial laws) shall be employed by the company.

2. Age Verification

- Adequate documentation (such as birth certificates or government-issued IDs) must be maintained to prove workers' age.
- Any discrepancies or concerns regarding age verification are promptly addressed.

3. Working Hours and Conditions

- We adhere to legal working hours limits and ensure that workers, including young workers, do not work excessive hours.
- Young workers (if legally allowed) must not be engaged in hazardous work or work that jeopardizes their health, safety, or education.
- We provide a safe and healthy working environment for all employees.

4. Reporting and Whistleblower Protection

- Any suspicion or evidence of child labor is reported immediately.
- We encourage workers and stakeholders to report violations without fear of retaliation.
- Whistleblower protection mechanisms are in place to safeguard those who report violations.

Supply Chain

Supplier Audits and Due Diligence

- Child labor risk assessments are part of our due diligence process. Significant questions related to their qualifications as a main supplier are inquired in our form (TR-FO-04) Supplier Approval Program.

Agencies for temporary workers

Any agency we recruit for temporary work must ensure steps are taken to align with the requirements of Bill S-211.

Risk Assessment

Internal Assessment:

Annual review of existing policies and procedures related to labor practices.

Human Resources

- Background or reference checks are conducted for new hires. Examination is made of the background of all staff as appropriate to their position, considering candidates' access to sensitive areas of the facility and the degree to which they will be supervised.

Agency recruiters

- Letter acknowledging their commitment to our standards

Conducted interviews with relevant departments.

Quality

- GFSI yearly audits for suppliers

Procurement

- Training with the procurement department to ensure proper documentation is completed prior to approving the supplier.

Production

- Transparency in the production department is presented as to whether the conduct of employees is in adherence to the policies (Code of Conduct, Code of Ethics and Human Resource policy)
- Evaluations are done on a yearly basis to ensure employees are treated fairly, and complaints are managed appropriately.

Supplier Engagement

Rustica requests information on their labor policies and due diligence processes.

- TR-FO-04 section (9) is dedicated to their CODE OF CONDUCT DISCLOSURE
- (Prohibit the placement of children and forced labor in all sectors of the supply chain). This section confirms their engagement to the Bill S-211

Remediation

- Non-compliance may result in termination of the business relationship (Supplier).
- Reference to the Remediation Policy

Training

- Annual and ongoing training in the review of company policies, including awareness campaigns.

Key Performance Indicators (KPIs)

Quality Department

- The Quality Department has measures in place with a monthly KPI containing a score card to ensure the supplier policy is effective.

Human Resources Department

- Regular meetings with staff and their supervisors
- Employee engagement surveys
- Absenteeism Rate
- Turnover Ratio

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report for the entity. 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.

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke.

Richard Morgante
President & Chief executive officer
Rustica Foods Inc.
May 22, 2024