

Forced labour can be found in every country and every sector. The [International Labour Organization](#) estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains. The measures introduced (the “Supply Chains Act” aimed to increase industry awareness and transparency to drive businesses to improve practices. Niche Bakers Corp. is defined as an “Entity” under the Supply Chains Act and therefore, must submit an annual report to the Ministry of Public Safety by May 31st of each year.

The following information uses the Minister’s online questionnaire as the template for this report.

Question	Response
This Report is for	An Entity
Legal Name	Niche Bakers Corp.
Financial Reporting Year	April 1 st ,2023 – March 31 st ,2024
Is this a revised version	No
Business Number	845721695
Is this a joint report	No
Is the entity subject to reporting in another jurisdiction	No
Which categorizations applies to the entity	<ul style="list-style-type: none"> • Has a place of business in Canada • Does Business in Canada • Has assets in Canada • Employs an average of at least 250 employees for at least one of its two most recent financial years
Which sectors or industries does the entity operate in	Manufacturing
In which country is the entity headquartered or principally located	Canada
In which province or territory is the entity headquartered or principally located	Ontario

What steps has the entity taken in the previous financial year to prevent the reduce risk that forced labour or child labour is used at any step of the production of goods.

To enhance our due diligence process Niche Bakers Corp. has a comprehensive cross functional team who examines our supply chain for high-risk activities from our suppliers. As part of the analysis a risk review of our supply activities are identified through geographical regions and industries. We require written proof from all our suppliers outlining that they adhere to the strict guidelines against forced and child labour. While we know that some of our vendors purchase goods from foreign countries, we may not know the full extent to where our vendors purchase their goods from. Therefore, we will continue to monitor our suppliers on a yearly basis and their activities efficiently and effectively with respects to modern slavery, high-risk categories and countries as they may change in the future as we learn more. Yearly training on this on-going issue will be conducted with new and current staff, to ensure everyone is aware of this on-going issue.

Which of the following accurately describes the entity’s structure.

This entity is a corporation

Which of the following accurately describes the entity’s activities.


Producing goods (manufacturing) in Canada, outside of Canada.
Selling goods in Canada, outside of Canada
Distributing good in Canada, outside of Canada

Additional information: Niche Bakers Corp. is a food manufacturer that produces various sweet goods and food products that is distributed within Canada and the U.S

Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour.

Yes. The entity has embedded responsible business conduct into policies and management systems.

Please provide additional information on the entity’s policies and due diligence processes in relation to forced labour and child labour.

	SOCIAL COMPLIANCE POLICY	Reference #: SOP-HR-39 Date Issued: Nov. 23,2021 Revision #: NEW Revision Date: Issued By: M. Melo Approved By: J. Rudkin
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SOCIAL COMPLIANCE POLICY

Statement of Principles

Niche Bakers Corp. strives to make its facilities a special place to work, with an atmosphere of mutual respect and professionalism. Niche Bakers and its business partners all have a responsibility to uphold these principles by creating an atmosphere in which each employee knows that he/she is valued as an individual and treated with respect and professionalism. Niche Bakers Code of Conduct enables us to conduct our business and to source production in a manner that is both profitable and socially responsible.

Implementation of this Code of Conduct enables Niche Bakers and its business partners to continually improve performance on worker's rights, labor standards, and other human rights issues integral to the production process.

Compliance with this Code of Conduct is mandatory for all Niche Bakers partners. Niche Bakers reserves the right to immediately terminate its business relationship and cancel all orders with any partner who does not comply with this Code of Conduct.

Work Environment

Niche Bakers is committed to treating all its employees with dignity and respect and providing its employees with a safe, healthy, clean work environment including appropriate and adequate facilities and protection from hazardous materials or conditions. Niche Bakers expects its partners to maintain the same standards in their factories. All Niche Bakers entities and all Niche Baker partners must comply with all applicable local laws and regulations governing working conditions. Niche Bakers strictly forbids the use of cruel and unusual disciplinary practices in the workplace.

Engage in Fair and Ethical Employment Practices

Fair Wages and Reasonable Working Hours: Niche Bakers and its partners must fairly compensate their employees by providing wages and benefits and reasonable work hours in compliance with local standards and applicable laws of the countries in which Niche Bakers and its partners are doing business. Niche Bakers and its partners must compensate their employees at a rate equal to, or greater than, the prevailing local minimum wage, including piece rate workers. Niche Bakers and its partners must not require employees to work more hours than the limits on regular and overtime hours prescribed by applicable law.

Child Labor: Niche Bakers will not accept the use of child labor in its operations under any circumstances and will not purchase product(s) from any partner that uses child labor. In determining whether a laborer is a "child," Niche Bakers will refer to the local legal minimum age for employment or the age for completing compulsory education in the country of manufacture.

Forced or Compulsory Labor: Niche Bakers will not accept forced or compulsory labor in its operations under any circumstances and will not purchase product(s) from any partner that utilizes forced or compulsory labor. Every employee must be a voluntary worker. Forced prison labor, or work against the will of an employee, including work required as a means of political coercion or punishment for expression of political views is strictly forbidden. No employee shall be subject to corporal punishment, threats of violence, or other forms of psychological or physical harassment, abuse or coercion.

Discrimination: Niche Bakers employs workers based on ability to perform a job task, not on the basis of personal characteristics, beliefs or any form of discrimination and expects its

partners to employ workers on the same basis. Niche Bakers and its partners shall comply with all local anti-discrimination laws and regulations.

Freedom of Association: Niche Bakers respects the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference, and expects its partners to respect the same rights.


Legal Compliance: Niche Bakers and its partners shall comply with the legal requirements and standards of their industry and the laws of the countries in which Niche Bakers and/or its partners are doing business. Niche Bakers and its partners shall comply with all applicable export and import requirements. Necessary invoices and required documentation must be provided in compliance with applicable law. All merchandise shall be accurately and clearly marked with its country of origin in compliance with applicable law.

Environment, Health and Safety

Niche Bakers has maintained a long-standing commitment to protect the environment and safeguard the health and welfare of its employees, neighbors and consumers. Niche Bakers recognizes that nearly every aspect of a processing business has a potential to impact the environment, human health or safety. It is Niche Bakers' responsibility to minimize those impacts and develop solutions that protect people and the environment and allow Niche Bakers to maintain the product quality and value that consumers demand. Niche Bakers' approach is to collaborate with its employees, suppliers, customers and consumers to identify, assess and minimize the environmental, health and safety impacts resulting from Niche Bakers bakery processing operations and the processing operations of Niche Bakers' partners.

Monitor Compliance

Niche Bakers conducts regular assessments of its facilities and the facilities of its partners to ensure compliance with its Code of Conduct.

	CODE OF BUSINESS CONDUCT	Reference #: SOP-HR-37 Date Issued: Sept 1, 2021 Revision #: NEW Revision Date: Issued By: M. Melo Approved By: J. Rudkin
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1.0 PURPOSE

The Code is a statement of certain fundamental principles and policies that govern employees of Niche Bakers Corp, (the Company), its subsidiaries, as well as the conduct of their parties with whom we do business. It is not intended to create any rights in any employee, customer, vendor, subcontractor, competitor, or any person or entity. The Company reserves the right to amend, alter or terminate the Code of Business Conduct at any time.

The Code does not replace exercising good judgement pertaining to legal and ethical behavior, but highlights critical areas of concern for the Company, providing guidance whereas uncertainty may exist.

2.0 SCOPE

The Code of Business Conduct applies to Niche Bakers Corp, (the Company), and all its subsidiaries. The Code purpose pertains all Company employees comply with applicable laws and regulations that affect work assignment, articulate a broader set of ethical standards that can be used as a practical guide in conduct and decision-making. Employees.

The Code of Business Conduct addresses:

3.0 ROLES & RESPONSIBILITIES

All employees are held to an absolute legal and moral obligation standard, as a Company, to manage ourselves and our business operations to the highest degree of honesty, ethics and integrity. Adherence to this Code of Business Conduct, therefore it is an essential condition of employment at every level of the Company.

Any violation of the Company's Code of Business Conduct may result in disciplinary action up to and including termination from employment.

4.0 PROCEDURES

The Ethical Decision-Making Process

Ethics is a decision-making process more than a simple statement of values or adherences to a set of rules. While this Code is both a statement of Company values and set of rules and adherence to it is a condition of employment, it is not intended to stand alone in guiding the employee. In itself, it cannot answer every feasible question an employee may confront.

Whereas questions may be too sensitive for open discussion, the employee is encouraged to speak, in confidence, with a Supervisor, Manager, Human Resources, or anyone within the senior management team.

Reporting a Suspected Violation

When an employee, in good faith, suspects that a material violation of the law or the Code has occurred, or is at risk of occurring, the employee is encouraged to immediately report the suspected violation to the Company. The employee can do this in a variety of ways, including contacting the supervisor, or other member of management, or if the employee is uncomfortable doing so, may contact Human Resources directly for assistance.

For a matter to be fully and fairly resolved, however, the employee may be asked to disclose their identity, provide more details, or cooperate in an investigation, although disclosure of the employee's identity is not required. In all instances, reported matters will be treated confidentially to the extent possible in conducting and concluding a proper investigation. Regardless of the outcome of any investigation, you can be assured that no retaliation against the employee from any source will be tolerated following a reported violation or suspected violation in good faith.

No Retaliation

An essential part of an effective ethical compliance program includes proving employees the means to report in good faith known or suspected violations of the Code of Business Conduct, the law, or Company policies and procedures without fear of retaliation from any sources.

Therefore, the Code will not tolerate any action taken in whole or in part in retaliation against anyone who has

No Retaliation – (Cont'd)

raised a question or concern in good faith about a violation of this Code, the law, or any Company policy or procedure. At the same time, the integrity of the reporting system and the respect we have for another means that those who act in bad faith and knowingly make a false report will be subject to discipline up to and including termination from employment. To the extent possible, the Company will maintain the confidentiality of anyone who reports a suspected violation or participates in the investigation of it.

Safety – Employee Health and Safety

Safety is a core value of our Company and our highest priority in conducting our business. Compliance with laws and rules intended to protect life and property is essential, but equally important is our ethical and moral obligation to conduct our business in a manner that protects the well-being of ourselves, our fellow employees, customers, and business partners who live and work within the communities we serve.

The Company will keep its employees, customers, and surrounding public safe at all times. The Company has a uniform, comprehensive set of safety policies and procedures to assist each employee in reducing the risk of injury or harm. These policies and procedures consist of a set of minimum standards, or operating procedures.

Our Company is vitally interested in the health and safety of each employee and customer and, as a Niche Bakers Corp. employee this must also be your responsibility. As such, the safety of each employee is our first commitment. Accident and injury prevention is so important that the Company will give precedence to safety over operating productivity. Promptly report to your Supervisor, JHSC member, or Human Resources any condition which you believe is unsafe. Any on-the-job- or work-related injury must be reported to your supervisor immediately. No job is so important and no order so urgent that we cannot take time to perform work safely. The Company will recognize no substitute for safety.

The Company will recognize and instill in its workforce the concept that safety is a shared responsibility of all employees.

- Supervisors and Managers will encourage employees to exercise caution at all times, use all available safeguards, and safety equipment, demonstrate behaviors that proactively prevent accidents and injuries, and comply with all rules, regulations, policies and procedures.
- No Supervisor or Manager will knowingly tolerate or permit any unsafe act, operation practice or behavior.
- Supervisors and Managers will ensure that safety operations, programs, meetings, inspections, and investigations within his/her designated area are carried out accordingly to these policies and procedures.

Safety – Employee Health and Safety – (Cont'd)

- Supervisors and Managers will consistently and constantly promote Niche Bakers Corp.'s employer of choice standard in setting an example for employees by always demonstrating proper safe behaviors.
- Employees will immediately report any unsafe conditions or incidents to their Supervisor/Manager and are encouraged to make suggestions for improved safety performance and conditions.
- Periodic safety training will be provided to employees to prepare them to perform their jobs according to Niche Bakers Corp. best-in-class safety policies and procedures.
- Employees will be held responsible for adhering to property safety rules.

Incident Reporting / No Retaliation

In an effort to maintain safe and healthy work environment in the workplace, accidents, injuries, and behavioral issues that occur at the Company or during the course of employment must be reported and investigated thoroughly. It is the intent of the Company to minimize accidents, injuries, and incidents by correcting identified causes when appropriate and feasible. This is applicable to Company employees, on-site vendors, contractors, and customers affected by such incidents.

Employees should take all threats seriously and refrain from confronting individuals who pose a likely threat situation. Immediately report to a supervisor or Manager any incidents that you believe put employees, vendors, customers, suppliers, contractors or any persons working with or associated with the Company at risk.

Sustained Development and Protecting the Environment

Niche Bakers Corp recognizes environmental protection as one of our guiding principles and key component of sound business performance. We are committed to reducing the Environmental impact of production activities and promoting circular economy to reduce, reuse, and recycle water. We have an interest in sustainable water management and efficient water use. Our internal strategy is to implement pollution prevention and control methods and to practice water and energy conservation in all areas of our facilities. We will operate in compliance with relevant federal, provincial and municipal environmental legislation, and we will strive to use environment best practices in all we do.

Compliance with Employment Laws

The people with whom we work every day are the most important part of our business. Niche Bakers Corp. and all of its subsidiaries recognize the responsibility that we, as individuals and as a Company, have toward the well-being of our fellow employees. We will maintain a workplace environment that respects the dignity of every employee and that is free of unlawful discrimination and harassment. We will immediately report a suspected crossing of these lines to supervisory personnel or Human Resources.

The company follows the Ontario Ministry of Labour minimum age requirement.

Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used.

Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

Has the entity identified forced labour or child labour risks in its activities and supply chains. No.

Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as steps that the entity has taken to assess and manage that risk.

Not applicable.

Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains.

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour.

Not applicable

Has the entity taken any measures 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 its activities and supply chains?

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Does the entity currently provide training to employees on forced labour and/or child labour?

Yes. The training is mandatory for all employees.

As part of our general manufacturing practices, all employees both new and veteran, receive annual training to raise awareness about the on-going issues revolving around child labour laws. It is mandatory for all employees to complete the Workers Health and Safety Awareness in 4 Steps program, provided by the Ontario Ministry of Labour, Training, and Skills Development. Each year all our employees are provided with a refresher training on this program. All employees are made aware of any changes to these policies as they occur. These policies and changes can be found on all our communication boards.

In-dept training is mandatory for all employees involved in contracting or purchasing decisions. This training includes obtaining contracts that confirm our suppliers are not engaged in child labour, as well as collaborating with the Quality Assurance department to track the country of origin of our suppliers.

Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour are not being used in its activities and supply chains.

Yes. The entity is implementing annual training sessions and audits of its policies and procedures related to forced and child labour. As part of our onboarding process, all employees

are required to acknowledge and sign off on this policy. These policies are reviewed annually to identify and implement any necessary updates as we learn more. The entity follows the Ontario Ministry of Labour minimum age requirements.

What method does the entity use to assess its effectiveness?

Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour.

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report for the Entity, 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 the material for the purpose of this Act, for the reporting year listed above.