



Forced Labour Report

Name of person authorized to complete questionnaire:	Mery Grubisic
Title:	VP, HR
Email:	mgrubisic@nichebakers.com
Legal name of Reporting Entity:	Niche Bakers Corp.
Reporting Year	April 1, 2023- March 31, 2024
Financial Year Covered by the Report:	Must reference activities undertaken during the previous financial year
Revised Version of Submitted Report?	No
Business Number	845721695
If yes, Date of original report submitted	
Changes made to original submission:	
Other entities covered by this report:	None
For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Mandatory)	No
Applicable Laws: (Select all that apply)	N/A
Which categories apply to the entity:	<ul style="list-style-type: none"> ○ Has a place of business in Canada ○ Does business in Canada ○ Has assets in Canada <p>Meets size-related thresholds (select all that apply):</p> <ul style="list-style-type: none"> ● Has at least \$20 million in assets for at least one of its two most recent financial years ● Has generated at least \$40 million in revenue for at least one of its two most recent financial years ● Employs an average of at least 250 employees for at least one of its two most recent financial years
Sector:	<ul style="list-style-type: none"> ● Food Manufacturing
Country of Headquarters	<ul style="list-style-type: none"> ● Canada
Province:	<ul style="list-style-type: none"> ● Ontario
Entity Structure	<ul style="list-style-type: none"> ● Corporation
Entities Activities	<ul style="list-style-type: none"> ● Producing goods (includes manufacturing, extracting, growing and processing), in Canada

Statement on Fighting Against Forced Labour & Child Labour

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 is committed to the protection of human rights. Modern slavery, which encompasses forced labour, child labour and human trafficking goes against Niche Baker’s values. In an effort to fight modern slavery, Niche Bakers has implemented a strategy to fight forced and child labour within our direct operations as well as within our supply chain. Niche Bakers holds high expectations for its employees, agency workers and suppliers. Everyone within the Niche Bakers including our supply chain organizations must demonstrate integrity and compliance with legislation, regulations, and policies set forth by Niche Bakers.

In order to Prevent and reduce the risk of forced labour and child labour, Niche Bakers has taken a number of steps to combat modern slavery:

In the pursuit to eliminate forced labour and child labour in its business and supply chain, Niche Bakers has taken a number of steps to combat modern slavery, assess and mitigate risk.

Niche Bakers has implemented a number of policies and procedures to combat modern slavery. All employees, including labour suppliers and agency workers, are provided a copy of, and are required to comply with the following Niche Baker’s policies:

- Business Code of Conduct Policy
- Human Rights Policy
- Health & Safety Policies
- Violence & Harassment Policy

In addition, our policies are posted within common spaces within the workplace. Policies are subject to an approval process by the Vice President of Human Resources and are reviewed annually.

Suppliers must have similar policies to the above noted policies. In the event a supplier does not have such policies, Niche Bakers provides our noted policies to the supplier, and asked to abide by local laws as well as Niche Bakers policies & procedures.

All leaders of Niche Bakers are expected to understand and comply with noted policies. All leaders and employees must participate in annual training related to our above policies. All leaders and employees are also mandated to attend annual Forced Labour training.

Embedded into our policies, Niche Bakers has incorporated procedures to ensure all new hires of Niche Bakers provide proof of legal age and working status. Niche Bakers does not employ anyone under the age of eighteen in our manufacturing facilities.

Due Diligence:

Niche Bakers is committed to conducting thorough due diligence and maintaining robust controls to ensure that forced labor and child labor are not present within our operations or supply chains. This plan outlines the steps Niche Bakers takes to assess, prevent, and address any instances of forced and child labor, ensuring compliance with local laws and our internal policies.

Supplier Expectations and Contracts

- **External Agencies:** Labour suppliers must disclose if they are using external agencies, both within and outside of Canada, to supply workers from foreign countries. This disclosure is critical to ensuring transparency and preventing exploitative practices in the recruitment of workers.
- **Audits and Compliance Monitoring:** Niche Bakers reserves the right to conduct due diligence and audits of suppliers to ensure compliance with both local laws and Niche Bakers' internal policies. These audits may include, but are not limited to, reviewing recruitment practices, examining contracts, and evaluating internal controls. As part of the audit, suppliers may be required to complete a questionnaire to confirm that they have required policies in place, ask for documentation of such, and may also require copies of any social compliance audits that have been completed within a 2-year timeframe.

Grievance Mechanism and Reporting

Niche Bakers has established a comprehensive Grievance Mechanism to allow employees and suppliers to report concerns or complaints confidentially. This system includes:

- **Multiple Reporting Channels:** Employees and suppliers can raise concerns through direct communication with management, including the Human Resources department. There are also anonymous reporting methods available to ensure that individuals can report without fear of retaliation.
- **Retaliation-Free Environment:** Niche Bakers has a strict policy against retaliation, ensuring that any individual who raises concerns about forced or child labor, or any other violation, is protected from adverse consequences.
- **Communication Channels:** Contact information is made publicly available, including through our website and within workplace common areas, ensuring that all suppliers and stakeholders are aware of how to report concerns. (<https://nichebakers.com> & <https://nichebakers.com/wp-content/uploads/2024/06/Niche-Bakers-CL.pdf>).

Participation in SMETA:

- **SMETA Audits:** Niche Bakers participates in SMETA (Sedex Members Ethical Trade Audit) assessments at the request of customers to demonstrate our commitment to ethical labor practices and to ensure transparency across our supply chains.

Mitigating Risk & Response to Non-Compliance

Niche Bakers has not identified any forced and/or child labour in our activities or supply chain and thus has not taken any remediation measures to date. Niche Bakers has 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.

In the event that Niche Bakers identifies forced or child labor risks or violations within its supply chain, the following process will be followed:

- **Investigation:** Niche Bakers will thoroughly investigate any reported non-compliance or concerns related to forced or child labor. This may include direct engagement with the supplier, and reviewing relevant documentation.
- **Corrective Action Plans:** If a violation is found, Niche Bakers will require the supplier to implement a corrective action plan to address the identified issue. The CAP must outline specific steps to be taken, with clear timelines for resolution.

- **Termination of Supplier Relationships:** In the event of serious or persistent violations of Niche Bakers' policies or relevant labor legislation, Niche Bakers reserves the right to terminate any agreement or business relationship with the non-compliant supplier. Termination is considered a last resort after exhausting all other options for remediation.

Annual Review and Continuous Improvement

Niche Bakers recognizes that due diligence is an ongoing process. To ensure continued compliance and improvement, the following steps will be taken:

- **Annual Policy Review:** Our policies are reviewed annually by our Human Resources and Compliance teams to assess their effectiveness and make updates based on new information, regulatory changes, or any emerging issues within our supply chains.
- **Feedback Loop:** We actively seek feedback from employees, suppliers, and stakeholders to refine and strengthen our processes. This feedback is incorporated into the annual review of policies and procedures.
- **Ongoing Monitoring:** Niche Bakers will continue to monitor its supply chain for signs of forced or child labor and will adjust its due diligence processes accordingly.

Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities 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 above.

Full name: Mery Grubisic

Title: VP, Human Resources

Date: March 24, 2025

I have the authority to bind Niche Bakers Corp.