

#### **ANNUAL REPORT**

### **PURPOSE**

This annual report for the 2024 financial reporting year, has been created by Produits Alimentaires Berthelet Inc ("Berthelet" or the "Company") for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the "Act"). The report outlines the approach and initiatives taken by Berthelet to identify and address the risks of forced labour and child labour in its business operations and supply chains in the 2024 financial reporting year.

# **COMPANY COMMITMENT**

Berthelet is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that Berthelet imports into Canada.

# STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN

Berthelet is headquartered in Quebec, Canada, and operates in the food manufacturing sector. The Company supplies a full range of food products for foodservice retail, healthcare, and industrial use.

# The Company's Structure

Berthelet is a wholly owned subsidiary corporation of Solina France SAS and is a member of the Solina Group. Berthelet does not own or control any subsidiaries.

### The Company's Activities

Berthelet manufactures a range of food products in Canada, including but not limited to, jams and jellies; sauces and dressings; soup and gravy bases; cold and hot beverage mixes; syrups; and dessert toppings. The Company supplies these food products within and outside of Canada for foodservice retail, healthcare, and industrial use. Berthelet provides customized food solutions, and pride itself on superior product quality, industry-leading order fill rates, quality control standards, and innovative research and development.

### The Company's Supply Chain

For its manufacturing process, Berthelet purchases various food related products and by- products from distributors based in Canada and the United States. At its request, these distributors provide Berthelet with information on the composition, quality and origin of the ingredients and packaging that is purchased. This exchange of information enables Berthelet to work together with its suppliers in a transparent and comprehensive way.



## Steps Taken by Berthelet in 2024

To prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada, Berthelet was, and continues to be, supported and bound by the policies and procedures maintained by its parent company, the Solina Group. In 2024, the Solina Group maintained several policies applicable to its related entities, including Berthelet. These include but are not limited to, a Vendor Code of Conduct and Human Rights Policy. As outlined in further detail below, these policies explicitly prohibit the use of child labour or forced labour for both suppliers and entities within the Solina Group.

### POLICIES AND DUE DILLIGENCE PROCESSES

As outlined above, Berthelet is supported and bound by the policies and procedures maintained by the Solina Group, which affirm its continued commitment to abiding by applicable forced labour and child labour laws:

- a) Berthelet is bound by the Solina Group's Code of Ethics (the "Code"). The Code applies to all employees within the Solina Group and its related entities and mandates that employees must not take any course of action in their day-to-day performance of work duties that is illegal. The Code affirms that all applicable employment laws will be followed wherever the Solina Group operates. Additionally, the Code explicitly states that members of the Solina Group must respect and support internationally recognized human rights and be guided by the International Labour Organization's declaration on fundamental principles and rights at work. The Code includes a mechanism for reporting any violations or suspected violations of the Code.
- b) Berthelet is bound by the Solina Group's Human Rights Policy which expressly prohibits all forms of forced labour and child labour. The Human Rights Policy also prohibits the hiring of individuals under 18 years of age for positions where hazardous work is performed, mandates that an assessment of child labour risk is to be included in all supplier audits where the source countries have been identified as at risk, and mandates that verifiable documentation of each employee's date of birth must be maintained as required by law.
- c) Berthelet is bound by the Solina Group's Vendor Code of Conduct. The Vendor Code of Conduct mandates that a supplier must comply with applicable national legislation and industry standards in their countries of operation. Pursuant to the Vendor Code of Conduct, suppliers to the Solina Group or its partners cannot use or support child labour and/or forced labour. The Vendor Code of Conduct expressly prohibits debt bondage or any other forms of forced and/or child labour. It also requires its suppliers to have in place their own policies and written procedures for remediation of children found to be in a working situation and to provide written evidence of due diligence processes upon request. Additionally, the Vendor Code of Conduct contains a "supplier declaration" which affirms that suppliers understand and agree to the content of the Vendor Code of Conduct. Solina Group suppliers are required to sigh this declaration prior to conducting business with a Solina Group affiliated entity.
- d) Berthelet is bound by Solina Canada's Child Labour Policy, which came into effect on



September 1, 2024. The policy applies to all employees, contractors, suppliers, and any other individuals or entities engaged in the company's operations and supply chain. The Child Labour Policy expressly prohibits the use of child labour and sets hiring requirements that are aligned with Canadian regulations on forced labour and child labour in supply chains and requires proof of age for all employees upon hiring. Under this policy, all supply chain partners are required to provide information regarding their policies and practices related to child labour.

- e) Berthelet is bound by Solina Canada's Recruitment and Selection Policy, which came into effect on November 15, 2024. The Recruitment and Selection Policy sets hiring requirements that are aligned with the Act and requires proof of age for all employees upon hiring.
- f) Berthelet is bound by the Solina Group's Whistleblowing Policy. The Whistleblowing Policy applies to all employees of any entities within the Solina Group. Berthelet has a hotline available to all employees to allow them to confidentially report if they have reasonable grounds to believe that a criminal offence is being committed or, that a person (which may include suppliers), is likely to fail in complying with any of their legal obligations. This policy ensures that employees feel confident raising any matters, including those potentially related to forced and child labour, without fear of reprisals.

# **FORCED LABOUR AND CHILD LABOUR RISKS**

Berthelet has not started the process of identifying the risk that child labour and/or forced labour is used in its supply chain. Berthelet is aware that there may be higher risks associated with certain regions, goods, and industries, and intend to explore options for engaging with the risk identification process in subsequent reporting years, should it become applicable.

### **REMEDIATION MEASURES**

Berthelet has not identified any forced labour of child labour in its activities. As such, it has not undertaken any remediation measures.

### REMEDIATION OF LOSS OF INCOME

Berthelet has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour of child labour in its activities and supply chains.

# TRAINING PROVIDED TO EMPLOYEES

In 2024, Berthelet did not provide training to its employees on forced labour or child labour. Moving forward, it will be assessing what related training may be appropriate.

# **ASSESSING EFFECTIVNESS**

Berthelet does not currently have specific policies and procedures in place to assesses its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, as outlined above, the policies and procedures of the Solina Group, which include



the Code, Human Rights Policy, and Vendor Code of Conduct, do reduce the risk that child labour and/or forced labour is present in Berthelet activities and supply chain.

### **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 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 material respects for the purposes of the Act, for the reporting year listed above.

**IN WITNESS WHEREOF** the authorized signing officer(s) of Produits Alimentaires Berthelet Inc. have executed this report as of the effective date of the signatures set out below.

SIGNED	)
	) Produits Alimentaires Berthelet Inc.
2025-05-13	Per: Julian
Date	) Name: Guillaume Dubois
	) <b>Title</b> : President
	)
	) I have authority to bind Produits Alimentaires Berthelet
	Inc.