

Premier Marine Canada Inc.

Modern Slavery Act Report

(Fiscal Year 2024)

1. Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This report refers to the August 31, 2024 fiscal year end of Premier Marine Canada Inc. (“PMC”), a private corporation incorporated in the Province of Ontario, and describes steps taken by the Company in 2024.

PMC is an importer of frozen seafood from around the world and creator of premium value-added meal solutions which are sold to the Canadian wholesale grocery industry through private label and our own brand. We support all forms of sustainable fishing, aquaculture and farming.

We recognize our responsibility to respect and protect the human rights of all people who support and intersect with our business, comprised of colleagues and employees in our office and all workers employed by third party suppliers in our supply chain network.

We are committed to preventing and reducing the risk of forced and child labour and expect our business partners and suppliers (as well as their contractors, agents, subcontractors, sub-agents and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

2. Steps taken to prevent and reduce the risk of forced labour or child labour

In 2024, we have taken the following steps 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 by the Company or of goods imported into Canada by the Company:

- Mapping our supply chain to help determine where high risk of forced labour and/or child labour could exist
- Conducted an internal assessment of risks of forced labour and/or child labour in PMC’s activities and supply chains
- Developed and implemented an action plan for addressing forced labour and/or child labour
- Gathered information on worker recruitment and maintained internal controls to ensure all workers are recruited voluntarily
- Addressed practices in PMC’s activities and supply chain that increases the risk of forced labour and/or child labour
- Developed and implemented due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in PMC’s activities and supply chain.
- Required PMC suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.
- Engaged with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaged with experts on the issue of addressing forced labour and/or child labour
- Audited suppliers to help identify the risk of forced labour and/or child labour within their factories.

3. Company policies and due diligence processes in relation to forced labour and child labour

PMC has adopted formal policies and put due diligence processes in place with respect to forced labour and/or child labour.

The following elements of the due diligence process have been implemented by PMC:

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results

We use the definition of slavery or forced labor as defined by the [International Labour Organization](#), which is “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.”

We also have adopted the definition of human trafficking in the Victims of Trafficking and Violence Protections Act of 2000: “any recruitment, harboring, transportation, provision or obtaining of a person for labor services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery.”

4. Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

We are aware that our global supply chain and the industries in which we operate present a risk of forced labour and child labour. Starting in 2023, all our offshore food manufacturers were required to undergo an ELEVATE Responsible Sourcing Assessment (ERSA) to evaluate compliance with local laws that are relevant to working conditions and the site's impact on the environment. This includes but is not limited to wages, working hours, health and safety, discrimination, disciplinary practices, freedom of association, environment, and other monitoring and documentation requirements. ELEVATE is a third-party expert and leader in sustainability and supply chain services.

Supply Chain Compliance

PMC's Quality Assurance (QA) department oversees our supply chain compliance by ensuring workplace condition assessments are conducted to our standards and that our products are sourced from approved factories. The audits performed on our suppliers are designed to confirm that suppliers providing goods to PMC uphold our Supplier Code, including provisions related to forced and child labour. We continuously review the supplier monitoring program to determine if an expanded scope of the program is necessary.

Once sourcing has begun, processes are in place to audit working conditions as well as fire, structural and safety assessments (if applicable). Facilities located in designated high-risk locations, such as Southeast Asia, require a fire, structural and safety assessment to be conducted prior to PMC beginning to source from the facility.

The audit program reinforces worker rights and safety by assessing and confirming these and other factors:

- labour is voluntary;
- workers are properly compensated;
- workers are not exploited;
- facilities comply with applicable employment standards (including minimum age);
- working hours are consistent with local laws and standards; and
- facilities meet health and safety laws and regulations.

Initial and annual facility compliance audits are typically conducted by third-party experts using a best-practice audit framework. PMC's QA team will also periodically conduct factory inspections to ensure the factory is

meeting the standards described in the audits and will also follow up to ensure verification of any corrective actions.

If an audit identifies a compliance issue, including but not limited to, child labour, forced or bonded labour, or life-threatening health and safety situations, PMC will suspend relationships with those facilities (and/or supplier). We will work with suppliers to determine whether satisfactory remediation of the compliance issue is possible and will terminate relationships with suppliers who are unable or unwilling to remediate non-compliance.

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

5. Remediation of 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

To date there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

6. Policies and procedures in place to assess effectiveness to ensure that forced labour and child labour are not being used in our business and supply chains

We are constantly working with our suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators.

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 or 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.

Steven Corbell

President

Premier Marine Canada Inc.

March 14, 2025

I have authority to bind Premier Marine Canada Inc.