



## *Parrish & Heimbecker, Limited*

### **Canadian Report on Forced Labour and Child Labour in Supply Chains**

May 31, 2024

#### **INTRODUCTION**

This Modern Slavery Report (the “Report”) is made by Parrish & Heimbecker, Limited on its own behalf and on behalf of our operating divisions P&H Milling Group and New-Life Mills (collectively, “P&H”, the “Company”, “we” or “our”) under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the period May 1, 2023 to April 30, 2024.

#### **ORGANIZATION AND STRUCTURE**

P&H is a privately held Canadian agri-business incorporated pursuant to the laws of Canada with diversified interests in grain procurement and merchandising, flour milling, animal nutrition and Canadian real estate.

P&H Milling Group and New-Life Mills are both operating divisions of P&H and are included in this Statement. All of our divisions described below under “Operations” are included under the single legal entity Parrish & Heimbecker, Limited.

#### **OPERATIONS**

**Grain:** The P&H National Grain Asset Network comprises approximately 45 locations that span from coast to coast across Canada. Our facilities are strategically located to match producer grain with the needs of both domestic and export end users in terms of quantity, quality and logistical requirements. The P&H National Grain Asset Network includes grain elevators, rail sidings, inland terminals and specialized export terminals.

P&H trades virtually any grain or legume produced in Canada, including: corn, feed barley, malt barley, milling wheat, oats, soybeans and canola

P&H also sources grains to supply flour milling, food, animal nutrition and ethanol industries. In Eastern Canada (Ontario), we also service the feed ingredient industry including wheat shorts, soymeal, DDGs and a variety of other by-products. Our Eastern locations also handle Non-GMO Soybeans.

**Crop Inputs:** P&H offers crop input products including crop nutrition, crop protection and seed as well as agronomic services at locations across Canada.

**Flour Milling:** Through its P&H Milling Group division, P&H sources wheat from Western Canada, Ontario, Quebec and Atlantic Canada to produce quality flour and cereal products. The lineup includes hard red spring wheat flour for breads and other bakery products, soft winter wheat flour for

cakes and cookies, as well as semolina flour for pasta, organic flour, and atta flour for chapati. In our specialty milling operation in Saskatoon we also mill pea fractions.

From its mills in Halifax, Nova Scotia; Acton, Hanover, Hamilton and Cambridge, Ontario; and Lethbridge, Alberta, the P&H Milling Group supplies flour to customers throughout Canada, the United States, the Caribbean, the Middle East, Iceland and Pacific Rim countries.

**Feed Mills and Farms:** Through its New-Life Mills division, P&H has been a manufacturer of livestock nutrition since 1964. With five production facilities and a dedicated team of experts in species management, nutrition and production, our commitment to the best possible inputs, feed, and services for; broiler chickens, eggs, turkey, beef, dairy, and swine, is the driving force behind our success.

Company-owned farms facilitate responsible nutrition and species management research and a strict quality assurance/ quality control program supports our FeedAssure certification.



## **SUPPLY CHAINS**

P&H procures goods from a large network of suppliers the vast majority of which are located Canada.

The main goods and services we source are:

<b>Type of Good Purchased</b>	<b>Description</b>
Commodities including grains, oilseeds and by-products	Sourced from Canadian farmers and agribusinesses
Crop input products for resale	Purchased from third-party suppliers located primarily in Canada
Grain handling and flour/feed manufacturing and storage equipment	Purchased from third-party suppliers located primarily in North America
Packaging	Purchased from third-party suppliers located primarily in Canada
Logistics (third-party trucking, and rail services).	Purchased from third-party suppliers located primarily in Canada
Office supplies	Furniture, computers and equipment, and software, etc. purchased primarily in Canada

## **POLICIES AND DUE DILIGENCE PROCESSES**

P&H is committed to respecting human rights principles and is guided by codes of conduct which set expectations for behaviour and decision-making. Conducting our business with strong ethics and integrity is a critical part of our success.

We have a comprehensive risk assessment and due diligence program in place for suppliers and have close working relationships with most of our large suppliers.

P&H is actively working to build on existing policies and procedures to enhance policies and processes specific to forced labour and child labour matters, and imbed responsible business conduct into our various policies and management systems.

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations or by suppliers working for us. We make every effort, including through carrying our due diligence and audits to monitor the performance of our suppliers, to prevent our activities having a negative impact on human rights.

We are committed to conducting our business in a lawful and ethical manner. Our Code of Ethics provides the foundation of our Company policies and sets out guiding principles on professional conduct and responsibilities. We also operate an Ethics Line to allow customers, suppliers and employees to raise any potential concerns. The Ethics Line is operated by a third-party vendor, providing a secure and confidential method for reporting issues or raising concerns.

### **PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR**

P&H engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, we refer to external data sources, map supply chains and conduct risk assessments.

Based on our review and mapping of our supply chain, we consider the risk of any part of the business or its supply chain carrying a risk of forced labour or child labour to be low. The vast majority of P&H's operations and suppliers are located in countries that have modern slavery or similar regulations in place.

### **MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR**

No instances of forced labour or child labour were identified in our operations supply chains during the reporting period. Consequently, no remediation measures were taken.

### **MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES**

As noted above, no instances were identified of forced or child labour in our supply chains during the reporting period. Consequently, no remediation measures were required.

### **TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR**

We consider the ethical conduct of our employees to be a critical success factor. All employees must have documented acknowledgement of the code of conduct specific to their division. No other training relating to forced or child labour was carried out during the reporting period.

### **ASSESSMENT OF EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN OUR BUSINESS AND SUPPLY CHAINS**

P&H is actively working to assess our environmental, social, and governance ("ESG") performance, and identify priority areas, including with respect to forced and child labour. In preparing this Report, individuals with oversight of operations, procurement and risk management were consulted and asked to provide feedback.

P&H intends to continue to monitor for indicators of forced labour and child labour in our business and supply chains. As part of our ESG assessment, we will continue to examine various policies, processes and procedures needed to address critical business risk, including forced and child labour.

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Ethics Line and other informal mechanisms of employee feedback. To date no significant concerns or complaints have been identified.

**ATTESTATION**

This Report has been approved by the Board of Directors of Parrish & Heimbecker, Limited in accordance with paragraph 11(4)(b)(ii) of the Act.

On behalf of the board of directors of Parrish & Heimbecker, Limited and not on my own personal behalf, and in accordance with the requirements of the Act, 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.

I have authority to bind Parrish & Heimbecker, Limited

A handwritten signature in black ink that reads "John Heimbecker". The signature is written in a cursive style with a long horizontal stroke at the end.

R. John Heimbecker, Chief Executive Officer

A handwritten signature in black ink that reads "Kevin L. Klippenstein". The signature is written in a cursive style with a long horizontal stroke at the end.

Kevin L. Klippenstein, Chief Financial Officer

May 31, 2024