

Griffith Foods

Report Pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Fiscal Year 2025

October 1, 2024 to September, 30 2025

Introduction

Griffith Foods Limited in Canada is a wholly owned subsidiary of Griffith Foods Inc. amongst other subsidiaries (“Griffith Foods”, “we”, “us”, “our” or “Company”). We are dedicated to upholding and protecting human rights and acting with integrity across all parts of our business. We adopt a zero tolerance approach to forced labour and child labour, and modern slavery. We are committed to continuing to take steps to understand and minimize these risks in our operations and supply chain and to strengthening our policies, due diligence processes and remediation efforts.

This Report outlines our efforts to address forced labour and child labour within our supply chain in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act” or “Canada Supply Chains Act”). It details our structure, supply chain, policies and due diligence, risks, remediation, training and assessment in relation to the requirement to detail the steps we have taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods imported into Canada in the previous financial year.

In FY25, with the support of an external human rights consultancy, we expanded our work to strengthen our human rights due diligence including our ability to detect, prevent and increase our readiness to remedy forced labour and child labour in our supply chain. In this period and up to the publication of this statement, we have strengthened policies and internal processes, assessed our Tier 1 supplier base for human rights, including forced labour and child labour risks, and developed a program of heightened due diligence for high-risk suppliers.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Global Vice President, Sustainability and General Manager Canada, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.



Graeme MacDonald
General Manager, with authority to bind Griffith Foods Limited
May 29, 2026



Kim Frankovich
VP Global Sustainability, with authority to bind Griffith Foods Inc.
May 29, 2026

1. Organisation and supply chain structure

1.1 Our organisation

Griffith Foods is a global product development partner helping food companies meet the evolving needs of consumers with high-quality, culinary driven, customized products. Founded in 1919 and headquartered in Alsip, Illinois, USA, Griffith Foods is a family-owned business known for collaborative innovation guided by its purpose to “Blend Care and Creativity to Nourish the World.” Operating in over 40 countries across six continents, Griffith Foods employs more than 4,700 people, including over 40 chefs and 340 food scientists, through a network of 20 own production sites, who work together to create solutions that nourish people, planet, and communities. In Canada we have approximately 466 employees.

The company’s product capabilities include seasonings, sauces, dressings, coating systems, and alternative protein solutions. Griffith Foods’ primary areas of focus include Foodservice, Food Manufacturers, Protein Processors, and Retail. For more information, visit <http://www.griffithfoods.com/www.griffithfoods.com>

The majority of our workforce is directly employed; however, we also engage contract temporary labour in certain locations for activities such as seasonal production. In Canada where third-party labour is used, the agency has an office onsite to help coordinate and assist our workforce. This agency is responsible for collecting all relevant documentation to ensure eligibility to work and provide specific Griffith Foods training before allowing anyone to start working with us. Our contract with the agency outlines how we expect the workers to be treated including payment.

1.2 Products, sectors and services

Griffith Foods supplies food ingredients primarily on a business-to-business basis. Our core product categories are:

- Seasonings
- Sauces and Dressings
- Alternative Proteins
- Textures and coatings
- Soups and Sides
- Dough Blends

1.3 Supply chain

Griffith Foods sources processed and raw materials and services from a global supplier base of approximately 1,509 suppliers across 1,875 supplier sites.

Tier 1 suppliers include:

- Ingredient suppliers (e.g. agricultural commodities such as spices, vegetables, oils, eggs, dairy inputs)
- Packaging providers
- Logistics and distribution partners

Upstream supply chain (Tier 2 and beyond) includes:

- Farms and plantations
- Primary processing facilities (e.g. drying, milling, extraction)
- Labour providers and intermediaries in agricultural production

These supply chains vary significantly by commodity. For example:

- Black pepper, chilli and tomatoes may involve smallholder farms or plantations in Mexico, India, Vietnam and many other countries, local collectors, exporters and processors before reaching Tier 1 supplier sites.
- Egg yolk, starches and other products may involve vertically integrated operations or contract farming models.

Griffith Foods requires certification and information on country of origin from suppliers and works to continually improve the percentage of its supply chain with traceability to farm level. Given the complexity of this work and our supply chains this is work in progress. Our Aspiration 2030 goal is to sustainably source from approved third-party certifications or regenerative agriculture projects a total of 80% of raw materials. At the end of FY25, we reached 32% towards our goal.

1.4 Modern slavery, forced labour, child labour risk management governance

Oversight of modern slavery, forced labour and child labour risks is embedded within the Griffith Foods broader governance framework for sustainability and sustainable sourcing. Accountability sits with senior leadership and is supported through three core global governance bodies: the Human Rights Steering Committee, the Sustainability Advisory Council, and the Global Purchasing Council (GPC). Together, these bodies provide strategic direction, oversight of risk, and alignment between human rights, sustainability and procurement functions.

Global governance structure

Governance body	Membership	Key responsibilities
Human Rights Steering Committee	VP Sustainability, SVP HR, VP Supply Chain, VP Procurement, General Counsel, Global Senior Director of Talent	Provides strategic oversight of the Company's human rights approach; ensures alignment with the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises; reviews emerging risks; guides prioritisation of salient issues; supports escalation and decision-making on severe risks.
Sustainability Advisory Council	Four independent members with deep expertise in human rights, small-scale farmers and agriculture; chaired by VP Sustainability	Supports environmental and social sustainability priorities and sustainability standards, tools and programmes; provides external counsel on strategy and program implementation
Global Purchasing Council (GPC)	Global purchasing leadership and regional procurement directors	Sets governance and strategic direction for procurement due diligence; approves procurement policies and standards; ensures consistency in supplier risk management globally; escalates severe supplier risks; aligns procurement practices with sustainability and human rights priorities.

Operational implementation

Implementation of the Company's human rights due diligence approach is supported by global and regional teams:

Team	Roles	Key responsibilities
Global Teams (Procurement & Sustainability)	Global functional leaders and subject matter experts	Design and maintain the human rights due diligence framework; develop tools, guidance and training; lead global risk assessments; provide technical expertise; support regional teams in implementation.
Regional Teams (Procurement & Sustainability)	Regional procurement and sustainability leads	Translate global standards into region-specific guidance; conduct regional risk assessments; manage supplier engagement and corrective actions; act as the interface between global strategy and local implementation.

This governance structure aims to support Griffith Foods to take a coordinated, risk-based approach to identifying, preventing and addressing modern slavery risks across its operations and supply chain, while ensuring accountability at both global and regional levels. This aims to ensure that issues identified within the supply chain, including allegations of forced labour, child labour, unsafe conditions, or other severe human rights impacts are escalated and addressed swiftly. In FY25 we began development of Griffith Foods' Remediation Procedure which we expect to complete and communicate during 2026.

2. Policies in relation to modern slavery, forced labour and child labour

Griffith Foods has established a set of policies and standards to communicate its expectations to prevent, identify and address risks of modern slavery, forced labour and child labour across its operations and supply chain. These policies outline expectations for employees, suppliers and business partners, and are integrated into Griffith Foods broader governance and due diligence framework.

The policy framework is designed to be practical and risk-based, supporting consistent implementation across geographies and supply chains. It is aligned with internationally recognised standards, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises, and is supported by supplier engagement, contractual requirements and monitoring processes.

Key policies relevant to modern slavery risk management are set out below.

Policy	Description and relevance to modern slavery, forced labour and child labour	Communication and enforcement
Human Rights Policy	Sets out the Griffith Foods global commitment to respect human rights across its own operations and supply chains. Aligns with international standards and provides the overarching framework for identifying, preventing and addressing risks such as forced labour and child labour.	Communicated internally through training and policies, and via our intranet to employees.
Supplier Code of Conduct	Sets minimum standards for suppliers, including explicit prohibitions on forced labour, child labour and exploitation. Covers broader areas such as environmental management, ethical business conduct and labour standards, ensuring a holistic	Communicated to suppliers during onboarding and embedded in contracts and terms and conditions. Compliance is monitored through supplier due diligence processes.

	<p>approach to responsible sourcing. Forms the foundation of supplier expectations across all tiers of the supply chain.</p>	
<p>Code of Ethics and Business Conduct Policy</p>	<p>The Code sets an overall expectation of respect for human rights and ethical conduct, and treats forced/child labour as prohibited human-rights abuses. The Code also sets expectations that supply chain participants uphold Griffith Foods' policies relating to legal compliance and respect for human rights. It sets out the responsibility to report misconduct in order to address issues immediately and prevent further damage.</p> <p>Our Code of Ethics also outlines our whistleblowing policy and protection for workers against retaliation.</p>	<p>Applies to all employees (including subsidiaries/branches/divisions), and employees are expected to comply with the Code.</p>
<p>Ethical Trading Standards Policy</p>	<p>Sets out the minimum labour and ethical standards expected across the Company's operations and supply chain and is aligned with the Ethical Trading Initiative (ETI) Base Code. The policy prohibits all forms of modern slavery, forced labour, child labour and other labour exploitation, and reflects internationally recognised labour standards, including those of the International Labour Organization.</p>	<p>The Ethical Trading Standards Policy is communicated to suppliers and business partners through supplier onboarding processes, contractual requirements and ongoing engagement.</p>
<p>TEROVA Human Rights Policy</p>	<p>Our TEROVA business, which works directly with spice and herb farmers to source key ingredients, has its own human rights policy, setting out expectations to manage priority risks including child labour and forced labour.</p>	<p>Stakeholders, including Griffith Foods employees, farmers, workers, cold storage service providers and contractors/sub-contractors, required to agree with the expectations in writing. Compliance is monitored by TEROVA's Field Officers.</p>

3. Risk management to assess and address modern slavery, forced labour and child labour risks

Griffith Foods recognises that modern slavery, forced labour and child labour risks are global and can arise in all types of businesses and supply chains, including within upstream supply chains for ingredients and raw materials. In our own operations, risks may relate to the use of third-party labour providers, temporary or agency workers, and service contractors (e.g., cleaning, security, logistics), particularly where workers may be migrant, low-wage, or otherwise vulnerable. In our supply chain, the greatest exposure is typically linked to country context and commodity production, including agricultural and food ingredient supply chains where labour may be seasonal, informal, or subcontracted or through smallholder farms. These risks can present as recruitment-fee charging and debt bondage, retention of identity

documents, restrictions on freedom of movement, excessive overtime, wage withholding, intimidation, and hazardous work for children.

We are working to assess and manage these risks through a structured, risk-based human rights and environmental due diligence (HREDD) approach that is embedded in our Supplier Journey. Our approach begins with onboarding controls (including restricted country screening and compliance/sanctions checks) and continues through a global inherent risk assessment and prioritisation process. Our most recent global supplier human rights risk assessment was undertaken at the end of FY25 and will be repeated every two years. This assessment is complemented by ongoing monitoring throughout the year through supplier assessment tools such as EcoVadis and issue escalation processes where allegations or indicators of severe harm arise.

Our inherent risk assessment combines (1) country risk and (2) category/commodity risk to establish a baseline risk profile for suppliers. Country risk uses a set of reputable, publicly available datasets that act as proxies for human rights and labour rights risk (including modern slavery and child labour prevalence). Category risk is informed through structured research and expert review, drawing on credible sources such as the U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour, the U.S. Trafficking in Persons (TIP) Report, UN/ILO publications, NGO reporting, and other recognized research and adverse media. Supplier-specific risk is then further assessed using evidence-based third-party tools and supplier disclosures, including EcoVadis Sustainability Assessment Questionnaires, independent audits (e.g., SMETA or equivalent where appropriate), and certification and traceability documentation for relevant commodities and regulatory requirements.

In FY25 and early FY26, our updated supplier human rights risk assessment informed our due diligence focus. The assessment covered 95% of our tier 1 suppliers and identified 14.1% as 'Priority Suppliers' for enhanced due diligence based on (i) higher inherent risk due to country and commodity/category; and (ii) spend greater than \$100k per annum. It also flagged 2.1% suppliers as having heightened inherent forced labour and/or child labour risk based on commodity and origin matches to the U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour.

Stakeholder engagement strengthens our understanding of actual and emerging risks beyond what can be captured through data and desktop tools alone. We engage internal stakeholders through governance forums and cross-functional working groups to review risk findings, align on priorities, and oversee implementation. Externally, our engagement is risk-based and includes suppliers and business partners, third-party auditors, certification schemes, and industry initiatives and multi-stakeholder platforms. Insights from stakeholders were used to validate our risk assessment findings and inform prioritisation.

4. Due diligence processes in relation to modern slavery, forced labour and child labour

Griffith Foods manages modern slavery, forced labour and child labour risks through an ongoing human rights and environmental due diligence (HREDD) approach embedded into our supplier management processes. This approach aims to be risk-based and proportionate, aligning our controls and engagement to the severity of potential impacts on people and to our level of exposure and leverage.

4.1 Human rights due diligence approach

Our supply chain due diligence begins at onboarding and continues through ongoing risk management and escalation/remediation processes:

- Supplier onboarding and minimum data requirements: Purchasing teams must collect and validate key supplier information (legal entity, operating/manufacturing locations, commodities/categories supplied and relevant origin/manufacture information).
- Restricted country screening: We screen suppliers and sourcing arrangements against internal and customer-driven restricted/prohibited country requirements. This includes countries that may present higher risk of forced labour or child labour occurring. Where sourcing from restricted countries is permitted, enhanced due diligence and approvals are required.
- NAVEX compliance/sanctions screening: Suppliers are subject to sanctions and compliance checks, and any flags are escalated and addressed before onboarding or continuation.
- Risk assessment and prioritisation: We conduct a global supplier human rights risk assessment every two years, using country and commodity/category risk to identify where heightened due diligence is needed. FY25 findings are used to prioritise suppliers, countries, and categories for enhanced engagement, assurance, and monitoring.

4.2 Prevention and mitigation

We have a number of controls to ensure compliance with our responsible sourcing requirements. As a condition of doing business with Griffith Foods, we require suppliers and partners to meet the requirements set out in our Supplier Code of Conduct and to complete a third-party supplier assessment. Controls include:

- Contractual and policy expectations (e.g., Supplier Code of Conduct and relevant terms and conditions)
- Use of third-party supplier assessment tools where applicable (e.g., EcoVadis SAQ for monitoring labour and human rights management systems) and the Corrective Action Plans (CAPs) to address identified gaps, with progress tracking and verification
- Griffith Foods also uses recognised third-party certifications, where relevant, as part of its supplier due diligence and monitoring to help identify and address risks of forced labour and child labour in the supply chain.

In the period since the end of our reporting year and the publication of this report we have developed a program of heightened due diligence for suppliers with elevated exposure to forced and child labour based on commodity and country of origin. This includes a supplier engagement program to understand high risk suppliers exposure to and management of forced labour and child labour risk along with targeted capacity building for purchasing teams. This will inform the development of targeted controls to prevent and monitor forced labour and child labour risks.

Our 2030 Aspirations

Improving farmer livelihoods is a central component of our sustainability strategy and 2030 Aspirations, including our commitment to positively impact 25,000 farmers and their families. Through our Terova team and broader sourcing partnerships, we work to strengthen farmer livelihoods, and resilience by building stable market access, supporting the adoption of regenerative agriculture practices, and investing in farmer capacity building and community initiatives.

These efforts contribute to long term progress toward positively impacting farmer livelihoods by enabling farmers to increase the value of their production, manage risks, and create more stable and diversified livelihoods. Strengthening farmer livelihoods also plays an important role in preventing modern slavery, forced labour and child labour as poverty is a key factor that can increase vulnerability to exploitation. When people are not paid enough to meet basic needs, they may be pushed into unsafe, unfair or coercive work. Children may enter into the workforce in order to earn money to support themselves and their families, to the detriment of their education, wellbeing and future development. Improving livelihoods helps reduce these risks and creates conditions where families can prioritize safe work, education, and long-term wellbeing.

4.3 Multi-sector stakeholder collaboration

We recognize that child labour and forced labour are systemic issues that require collaborative approaches. We are an active member of multistakeholder initiatives that facilitate peer-to-peer learning, pre-competitive project development and advocacy. For instance, we are members of AIM-Progress, a member-led forum of fast-moving consumer goods (FMCG) companies and suppliers who are working to advance human rights in supply chains through responsible sourcing.

We are also members of the Sustainable Spice Initiative (SSI), a sector-wide consortium bringing together international companies and other stakeholders across spices, herbs, and dehydrated vegetables value chains to drive more sustainable production, processing, and trade. Through SSI, Griffith Foods is taking a leading role and actively contributing to collective approaches to responsible sourcing, including addressing child labor risks. A Griffith Foods representative serves as Vice Chair of the SSI Child Labor Working Group, contributing to the development of the SSI social strategy and supporting collaborative initiatives, including ongoing work in Vietnam to strengthen child protection in black pepper supply chains.

4.4 Employee engagement and worker voice (own operations)

Griffith Foods engages employees on workplace experience, culture and related topics through periodic employee surveys. In 2025, we implemented a new HR system, which is expected to improve our ability to run surveys in a more consistent, timely and scalable way going forward, including improved segmentation and analysis of results.

In addition to surveys, employees have access to internal reporting and escalation channels, including our ethics and compliance reporting mechanism (NAVEX), which can be used to raise concerns confidentially and without retaliation. More information can be found in the next section.

4.5 Supplier and worker engagement

Supplier engagement is currently undertaken primarily through our supplier due diligence processes and performance management, including communication of our Supplier Code of Conduct, completion of onboarding checks, use of third-party assessment tools (e.g., EcoVadis), and the implementation and tracking of corrective action plans (CAPs) where issues are identified.

Direct engagement with supply chain workers is not yet implemented as a standalone program across our supply base. Worker perspectives may be captured indirectly where independent audits occur (e.g., through worker interviews), and through grievance mechanisms available to stakeholders. Building on the FY25 supply chain risk assessment findings, we will work to identify ways we can strengthen supplier engagement with priority suppliers and further develop approaches to worker voice.

5. Grievance mechanisms and remediation and processes

Griffith Foods recognises that effective grievance mechanisms are an important component of human rights due diligence and support the early identification and remediation of potential or actual harm. Suppliers are expected to have appropriate grievance mechanisms in place for workers and affected stakeholders.

In addition, Griffith Foods has established a transparent and reliable process for investigating and remediating grievances. Any grievance or report from employees and external parties may be submitted anonymously online or by phone call to the ethics hotline, which is operated by an independent third-party and available 24 hours a day, seven days a week. Employees can also raise issues with their manager, human resources representative, and/or through their employee representative. Griffith Foods and its management will not tolerate retaliation against anyone who, in good faith, raises concerns or participates in an investigation.

We will continue to review the effectiveness of this mechanism against the UN Guiding Principles on Business and Human Rights (UNGPs) effectiveness criteria and are considering opportunities to strengthen communication, accessibility and trust.

In FY25, we did not identify nor were there any reported incidents of forced labour or child labour in our supply chain.

6. Training

Training is part of Griffith Foods' approach to preventing and identifying forced labour and child labour risks by ensuring employees and relevant functions understand our expectations, know how to recognise indicators of risk, and are equipped to escalate concerns through appropriate channels.

Employees attend eLearning training on our Code of Ethics and Business Conduct Policy which include forced labour and child labour. Beginning in 2026, this training will be required annually and we will report percentage of completion for Canadian employees in our next report.

Purchasing and sustainability colleagues are provided training through our participation with the UN Global Compact (UNGC) and its Academy. In FY25, our Purchasing Team members completed the Business and Human Rights: How Companies Can Operationalize the UN Guiding Principles course in order to build foundational knowledge on human rights due diligence. Two members of the global purchasing and human resources team also completed the UNGC's Business & Human Rights Accelerator course, a six-month program designed to help businesses to move from commitment to action on human rights and labour rights.

7. Measuring effectiveness

We are committed to continuous improvement. During FY25 and into FY26, working with an independent human rights consultancy, we undertook a human rights assessment including a gap assessment of our human rights programme against the UNGPs and OECDs to measure the effectiveness of our actions. The aim of this assessment is to develop actions in FY26 for improvement. This assessment has involved reviewing over 70 documents, interviewing more than 30 employees and assessing 1,430 suppliers.

We have started monitoring our performance to track and improve our ability to identify human rights and modern slavery risks including the following KPIs:

KPI	Performance FY25
Percentage of tier 1 suppliers assessed for inherent risk	95% ¹
Percentage of Tier 1 suppliers complete an EcoVadis SAQ	88%
Percentage of Tier 1 suppliers complete and EcoVadis SAQ with a minimum score of 50/100	81%
Percentage of purchasing colleagues who have completed UNGC training.	100%

8. Continuous improvement and next steps

Continuous improvement is central to our approach to preventing and reducing the risk of forced labour and child labour in our operations and supply chain. Building on the FY25 programme of enhanced human rights due diligence, including our global supplier risk assessment and the effectiveness review described above, during FY26 we will continue our efforts to improve our human rights due diligence programme, including:

- Continue to strengthen our governance and ensure our human rights steering committee has training on human rights and undertake regular meetings to review our human rights program.
- Update our human rights policy and supplier code of conduct.
- Providing training to purchasing, sustainability and regulatory colleagues on forced labour and child labour.
- Develop guidance for our purchasing colleagues on supply chain due diligence as well as child labour.

¹ 5% of our Tier 1 suppliers were excluded in the FY25 risk assessment due to gaps in available information on country and category.