Give and Go Prepared Foods Corp.

2023 Modern Slavery Report

1 Introduction

This report ("**Report**") constitutes the first report prepared by Give and Go Prepared Foods Corp. ("**Give & Go**", "**our**", "**us**" or "**we**") pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**").

This Report relates to the financial year ended December 31, 2023 (the "Reporting Period").

2 Steps taken to prevent and reduce the risks of forced labour and child labour

In general terms, Give & Go took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in its business and supply chains:

- initiated a preliminary internal assessment of the direct suppliers and compared against highrisk countries of origin;
- started creating a risk assessment tool that will allow us to rate high risk suppliers based on their country of origin and the types of goods supplied;
- initiated the process of gathering information on our employee recruitment and maintained internal controls to help verify the voluntary recruitment of employees;
- continued to request that our suppliers have in place policies and procedures aimed at identifying the use of forced labour and/or child labour in their activities and supply chains;
- continued to include anti-forced and anti-child labour contractual clauses in our standard supplier agreements;
- developed and implemented training and awareness materials for all employees on forced labour and child labour; and
- initiated the development of a supplier online portal to facilitate communication and upload required documentation from suppliers on issues such as forced labour and/or child labour.

Details on the foregoing are set out in further detail in this Report.

3 Structure, activities, and supply chains

3.1 Structure

Give & Go is a Canadian manufacturer of fully-finished, sweet baked goods for every season and across four key consumer consumption occasions: "Celebration Solutions", "Breakfast Solutions", "Everyday Treats" and "Better For You Snacking".

Acquired by Mondelēz International, Inc. in 2020, Give & Go is a direct subsidiary of Mondelēz Canada Inc. (collectively referred to as "**Mondelēz**"). Accordingly, Give & Go benefits from access to Mondelēz's consumer and channel insights, procurement, marketing and sales resources to expand the reach of its brands to more consumers. Give & Go has one controlled subsidiary, Give and Go Prepared Foods (U.S.A.) Corp., which operates in Delaware, United States.

Give & Go employs approximately 1,700 full-time employees in Canada, and approximately 330 fulltime employees in the United States, with roles ranging in manufacturing operations, administration and management, customer service, engineering, human resources, information technology, maintenance, sanitation, marketing, product development, sales, quality assurance, supply chain support and procurement.

3.2 Activities

Give & Go is a manufacturer of premium frozen, thawed and fully-finished sweet baked goods. We market our solutions under the following proprietary brands: two-bite®, Create-A-Treat®, Kimberley's Bakeshoppe [™], Mason St. Bakehouse®, and The Worthy Crumb Pastry Co.®. Give & Go's baked goods are sold to leading retailers and food service operators.

Our operations consist of seven production facilities, two co-pack and warehouse facilities, a frozen goods distribution center, a samples warehouse and a corporate head office, all located within the Greater Toronto Area in Ontario, Canada. Give & Go also operates one production facility based out of Shirley, New York in the United States.

Give & Go also imports goods such as equipment, parts, ingredients and packaging into Canada to support the production needs of its Canadian production and distribution facilities.

3.3 Supply Chains

Give & Go sources goods (for both resale to retailers and consumers and internal business use) globally from a large variety of direct suppliers operating in a variety of industries including raw food products and baking supplies, such as wheat, cocoa, vegetable oils (including palm oil), hazelnuts, sugar, milk and eggs, industrial and electrical supplies, manufacturing equipment and packaging supplies. We source the majority of our goods from direct suppliers in North America.

Give & Go also has service suppliers consisting primarily of providers for software services, inbound and outbound freight services, engineering services, waste and sanitation services, consulting services,

contracting agency services and contingent labour. We source the majority of our services from direct suppliers in North America.

Through intercompany agreements with its parent company Mondelēz, Give & Go benefits from the shared use of approximately 30 Mondelēz suppliers, from which we source goods and/or services ranging from equipment to ingredients.

We aim to work with suppliers who are committed to upholding our same standards, guided by the principles outlined in the Mondelēz Supplier and Partner Code of Conduct and Human Rights Policy (as further described below).

4 Policies and due diligence processes

4.1 Policies

Give & Go's goal to reduce the risk of forced labour and child labour in its business and supply chains is underpinned by a number of policies. Give & Go's Policy Committee is responsible for overseeing the development and annual revision of our human resources policies, which undergo an approval process involving the Vice President of Human Resources of Give & Go. Give & Go engages with Mondelēz during the development of our policies.

(a) Supplier and Partner Code of Conduct

Give & Go has committed to Mondelēz's Supplier and Partner Code of Conduct, which is referenced in our standard supplier agreements, and which we also aim to communicate to all our direct suppliers. The purpose of the Supplier and Partner Code of Conduct is to set out expectations with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, and business ethics. It also outlines our requirement for suppliers to comply with and communicate these guidelines through their own supply chains, and to seek to adopt management systems, policies, procedures and training to uphold these standards. The Supplier and Partner Code of Conduct asks that suppliers strive to eliminate the use of human trafficking, forced labour or child labour. It is available on Mondelēz's website <u>here</u>.

(b) Supplier Ethical Expectations

The Mondelēz Supplier Ethical Expectations, which Give & Go has also adopted, set out Mondelēz's and Give & Go's expectations when dealing with suppliers, such as the corporate social responsibility expectations. For instance, the Supplier Ethical Expectations discusses forced labour, child labour, worker safety and applicable disciplinary actions, and Mondelēz and Give & Go endeavour to include these types of provisions in our standard supplier agreements. The Supplier Ethical Expectations also reference the Code of Conduct (as further detailed below).

(c) Code of Conduct

The Mondelēz Code of Conduct sets out company-wide values which we consider relevant to all employees, temporary and contract workers, consultants, agents and other third parties acting on Mondelēz's behalf. As a Mondelēz subsidiary who agrees to adopt and comply with the Code of Conduct, Give & Go employees are trained on the Code of Conduct on an annual basis. The Code of Conduct also includes guidelines for Mondelēz's direct suppliers, including with respect to alignment with certain corporate responsibility expectations.

The Code of Conduct states that the use of forced and/or child labour will not be tolerated. The Code of Conduct, which Give & Go aims to communicate to its direct suppliers, has been translated into 32 languages and is available on here.

(d) Human Rights Policy

The Mondelēz Human Rights Policy, which Give & Go has adopted, is intended to apply to all employees, temporary and contract workers, consultants, agents and other third parties who act on behalf of Give & Go. It is also referenced in the Supplier and Partner Code of Conduct.

In adopting the Human Rights Policy, Give & Go endeavours to commit to the following principles while conducting its business: prohibiting the use of forced labour and/or child labour, respecting freedom of association and collective bargaining rights, and providing fair compensation and development opportunities for all employees. The Human Rights Policy is available on Mondelēz's website <u>here</u>.

(e) Social Accountability Policy

Give & Go's Social Accountability Policy, which is available to all permanent salaried and temporary fulltime employees at all our locations, communicates the expected standards related to Give & Go's legal, ethical and social responsibilities. Namely, the Social Accountability Policy sets out that forced or child labour of any kind should not be used in our operations, that local laws relating to wages and maximum allowable working hours are complied with, and that employees are free to unionize if desired, among other things. The Social Accountability Policy provides that Give & Go may engage in annual third-party audits to evaluate compliance with the Social Accountability Policy.

(F) Workplace Violence and Harassment Policy

Give & Go's Workplace Violence and Harassment Policy helps us to promote a safe and healthy workplace for our employees and to reduce the risks of violence or harassment in the context of their employment. The Workplace Violence and Harassment Policy also describes the measures we have in place to respond to the impacts and risks that may result from these types of incidents.

4.2 Due Diligence Processes

(a) Integrity HelpLine and WebLine

Mondelēz has established WebLine, which is operated by an independent company, to provide an electronic method to report concerns with respect to violations of the law, the Code of Conduct and other compliance-related policies. Any concerns of suspected wrongdoing may also be reported by calling the Mondelēz Integrity HelpLine. Accessible on Mondelēz's website <u>here</u>, WebLine is available in 35 languages and HelpLine is offered in more than 150 languages.

As set out in the Supplier and Partner Code of Conduct, we strive to communicate these reporting channels to direct Give & Go suppliers, which is typically referenced in our standard supplier agreements. In line with the Supplier Code of Conduct, Give & Go requests direct suppliers to report any such violation in a timely manner. Give & Go encourages all employees to report any violations of the Human Rights Policy, and the Human Rights Policy provides that we do not tolerate any retaliative measures against employees who choose to report suspected misconduct.

(b) Risk and Compliance Committee

Give & Go's Risk and Compliance Committee ("RCC"), which oversees and monitors Give & Go's compliance, risk management and risk mitigation activities, is responsible for reviewing our management's processes for assessing and managing risk and compliance. Bi-weekly RCC meetings are held with Give & Go to discuss compliance, risk assessments and internal audit and controls updates, which may include topics related (directly or indirectly) to the risk of forced labour and/or child labour.

(c) Good Manufacturing Practices (GMP) Certification

Give & Go strives to work with suppliers which have received a GMP Certification, which aims to ensure the integrity of the food manufacturing process as well as compliance with food safety regulations.

(d) Roundtable on Sustainable Palm Oil (RSPO) Certification

Give & Go aims to work with direct suppliers that have obtained an RSPO Certification, which provides the assurance that palm oil suppliers have committed to and complied with certain sustainability requirements. The RSPO Certification also includes requirements related to labour standards and working conditions, including the right of workers to freedom of association and the protection of the rights of vulnerable groups of workers.

(e) Employment Practices

Give & Go is committed to respecting the human rights of our employees by complying with all applicable laws and regulations related to human rights, worker safety, employment and labour and through the implementation of our internal employment policies and processes that align with our ethical and corporate social responsibility standards. Give & Go takes employee concerns seriously and encourages the prompt reporting of complaints and/or concerns in the workplace so that appropriate action can be taken and incidents investigated.

Through Give & Go's Open Door Process, which we aim to advertise in common working areas and to communicate via our employee portal, Give & Go employees are provided with an anonymous and confidential way to report issues and inappropriate conduct or behaviour in the workplace, including instances of unsafe work practices. Reports may be made through an online form or a toll-free hotline.

5 Risks of forced labour and child labour in our business operations and supply chains

5.1 Operations

Given that the majority of our business operations are conducted in Canada, that most Give & Go's workforce is employed in Canada, and that we have human resources policies and procedures in place to help ensure compliance with all applicable laws, we consider the risk of forced labour and child labour occurring within our business operations to be low. On an annual basis, Give & Go endeavours to engage with a third party auditing firm to conduct a four-pillar SEDEX Member Ethical Trade Audit ("SMETA") audit on Give & Go's manufacturing operations. This audit addresses standards related to labour, health and safety, environmental performance and ethics. Past audits have not identified non-conformances related to child labour and forced labour.

5.2 Supply Chains

During the Reporting Period, Give & Go began the process of conducting a preliminary internal assessment of the direct suppliers and compared against high-risk countries of origin. We acknowledge that certain manufacturing regions and materials carry a higher risk of forced labour and child labour due to its prevalence in specific countries and industries.

As Give & Go procures many goods from a variety of suppliers, both domestically and internationally, we acknowledge a risk that forced labour and/or child labour may be used in our extended supply chains. A preliminary risk assessment, conducted by our parent Mondelēz for suppliers shared with Give & Go, has involved categorization of some suppliers as higher risk and others as lower risk (such as our domestic suppliers). We also acknowledge that the procurement of certain raw materials, such as cocoa and palm oil, carry a higher risk of forced and/or child labour.

6 Steps taken to assess and manage the risks of forced labour and child labour in our operations and supply chains

6.1 Operations

Give & Go's hiring process requires all new hires to provide proof of legal working status and we comply with applicable human rights, employment and labour laws.

Further, the Give & Go Human Resources Team are expected to understand, support and reinforce conduct consistent with the hiring policies as set out in the Social Accountability Policy, and to identify

improvement opportunities by conducting periodic internal assessments of social compliance as part of Give & Go's internal management program.

6.2 Supply Chains

While Give & Go has not completed a formal risk assessment of forced labour and child labour in our supply chains, we have initiated the mapping of our direct suppliers and have begun the process of creating a risk tool that will allow us to rate high risk suppliers based on the country of origin and the types of goods supplied.

Further, we strive to work with suppliers which have obtained their GMP and RSPO Certifications and with those who have confirmed receipt of the Supplier Ethical Expectations policy.

(a) Contractual Measures

The standard agreement that we commonly use with key suppliers contains provisions related to corporate social responsibility that require that suppliers agree to not use forced or child labour, to provide safe working conditions, to allow their workers to organize and to maintain reasonable working hours for workers.

Give & Go also procures goods and services from direct suppliers of Mondelēz, who incorporates similar contractual measures requesting that suppliers not use forced or child labour in their operations. Give & Go procures goods and services from these suppliers through standard agreements that reference policies relating to the prohibitions on the use of forced and/or child labour.

Included as a reference in our standard agreement, the Supplier and Partner Code of Conduct sets out guidance for suppliers to help them adhere to the principles and standards set out therein, such as working with their own suppliers to implement principles and standards related to the use of forced labour and child labour.

(b) Supplier Audits

We have standard agreements in place with key direct suppliers which contain provisions that state that Give & Go has the right to audit such supplier's operations to evaluate compliance with the terms of the supplier agreement, which terms include compliance related to the use of forced labour or child labour. If a supplier violates the terms and conditions of the supplier agreement, Give & Go may request that supplier to take corrective and/or preventative actions. Additionally, Give & Go may request to further audit supplier facilities or their records in order to evaluate the corrective measures taken, and may withhold payment or terminate the agreement if an audit is refused.

7 Remediation measures

There is nothing to report with respect to measures taken during the Reporting Period to remediate (i) instances of any forced labour or child labour, or (ii) the 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 our activities

and supply chains.

In line with the Mondelēz Human Rights Policy, Give & Go strives to provide access to effective remedy if violations such as child labour, forced labour and human trafficking have occurred in our supply chains and we require the same from our suppliers. Furthermore, in line with the Mondelēz Supplier and Partner Code of Conduct, we ask all suppliers to report any such violation in a timely manner.

8 Training

Give & Go offers various training programs for its employees and agency workers (as applicable) at the time of onboarding and on an annual basis. Employees across several departments such as human resources, procurement, quality assurance, operations, sanitation, and sales receive mandatory annual training / training at the time of onboarding on matters related to our Human Rights Policy and Social Accountability Policy, which engages with the issues of forced labour and child labour.

During the Reporting Period, Give & Go offered mandatory training sessions to all employees on the issues of forced labour and child labour through its Team Talks initiative, which reiterates Give & Go's commitment to proactively assess and manage the risk of forced and child labour within its operations and supply chains. During the Team Talks, Give & Go's Open-Door Process is communicated to all employees as a reminder for those who wish to raise any concerns, including those related to the use of forced and/or child labour. Salaried employees were also required to provide an attestation respecting the Mondelēz Human Rights Policy and the Give & Go Social Accountability Policy.

9 Assessing the effectiveness of our actions

Give & Go is committed to proactively assessing and managing the risk of forced and child labour within its operations and supply chains through the implementation of policies and processes aiming to prevent these risks. In general terms, our RCC risk management team is responsible for overseeing compliance with legal and regulatory requirements, Give & Go's enterprise risk management processes, and our environmental, social, and governance strategies.

As described in this Report, Give & Go is in the process of implementing measures that are aimed to identify, prevent, assess, manage and reduce the risks of forced labour and child labour in our activities and supply chains. However, to date, no actions have been taken to formally assess the effectiveness of these measures.

10 Approval

This Report was approved by the board of directors of Give and Go Prepared Foods Corp. for the financial year ended December 31, 2023 pursuant to paragraph 11(4)(a) of the Act.

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 Give and Go Prepared Foods Corp.. 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.

I make the above attestation in my capacity as a director of Give and Go Prepared Foods Corp. for and on behalf of the board of directors of Give and Go Prepared Foods Corp.

DocuSigned by: Jost Fitt -B847464BBE84443...

Joel Flatt Director Give and Go Prepared Foods Corp. May 30th, 2024

I have the authority to bind Give and Go Prepared Foods Corp.