



## **Fighting Against Forced Labour and Child Labour in Supply Chains Act**

**Legislation:** *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

**Reporting Year:** 2

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**Accountable Signing Authority:** President

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## Martin Brower Canada Overview

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9) (the “Act”), this report has been prepared by Martin-Brower of Canada Co. (hereinafter “Martin Brower Canada”, “our”, “us” and “we”) to outline the policies, practices and measures implemented during our most recent financial year to identify, prevent and mitigate the risks of forced labour and child labour within our operations and supply chain. This report is intended to satisfy Martin Brower’s annual public reporting obligation under the Act.

Martin Brower Canada is a global leader in supply chain solutions. We partner with organizations to architect smart, sustainable supply chains that fuel growth and positively impact customers and communities.

We are dedicated to creating an outstanding work environment for our team of 1000+ employees, who combine our expertise with the latest technologies to deliver unmatched value for our customers and protect their brands.

At Martin Brower Canada, we are committed to upholding internationally recognized human rights and to taking steps to prevent the use of forced labour and child labour in our operations and supply chain. Through the implementation of internal policies and procedures, we work to create and maintain safe, inclusive, and respectful work environments in all jurisdictions where we operate. We recognize the fundamental rights of our employees and those working within our supply chain, including the right to be free from forced labour, child labour, and all forms of modern slavery; the right to associate freely (or not) and to engage in lawful collective bargaining; the right to equal opportunity and a workplace free from discrimination and harassment; and the right to a safe and healthy working environment.

Martin Brower Canada continues to develop and strengthen our understanding of the potential risks of forced labour, child labour, and other forms of modern slavery within our operations and extended supply chain. We are actively working to identify areas where such risks may be present and to enhance our due diligence and risk assessment processes accordingly. As part of this ongoing effort, we are engaging across our business functions and collaborating with suppliers and other stakeholders to implement appropriate measures designed to prevent, mitigate and address these risks.

Martin Brower Canada maintains a zero-tolerance stance toward all forms of modern slavery, including forced labour and child labour, within our organization and throughout our supply chain. We acknowledge our responsibility to respect and promote the rights of individuals working for us, as well as those employed by our suppliers and business partners who are expected to uphold similar human rights standards. We recognize that addressing human rights risks – particularly those related to forced labour and child labour – requires coordinated and sustained efforts. Accordingly, we are committed to engaging with internal teams, suppliers, and other relevant stakeholders to promote awareness, foster understanding, and drive continuous improvement across our operations.

## Section One: Our Structure, Operations & Supply Chains

### Our Structure

Martin Brower Canada is part of the Reyes Family of Businesses ("RFB"). The RFB is a global business, with over 36,000 employees, and more than 200 properties. RFB are dedicated to being the best in the industry by achieving unmatched value for their customers while creating an outstanding work environment for their employees.

Martin Brower Canada is a leading supply chain solutions provider architecting smart, sustainable supply chains that fuel growth, creating an outstanding work environment for our employees and delivering unmatched value to our customers while protecting their brands.

Globally, we are renowned for finding innovative and timely means of delivering products to customers and are well known for setting new standards for on-time delivery, dependability, efficiency, and safety at the international level. Martin Brower has significant presence globally with sites in Australia, Bahrain, Brazil, Canada, Costa Rica, France, Ireland, Korea, Kuwait, New Zealand, Oman, Panama, Puerto Rico, Qatar, Singapore, the United Kingdom, United Arab Emirates, and the United States.

### MB Canada Operations

Martin Brower Canada is a Supply Chain Solutions and Logistics company providing inbound and outbound logistics services in all provinces across Canada.

The core operational outputs of Martin Brower Canada sites include operation of a warehouse and cold store facility where pre-packaged products are procured from approved suppliers and distributed to customer locations.

The Martin Brower Canada culture is built off a strong sense of social responsibility and ethical behaviour, a commitment to safety across all elements of operation, and a dedication to strengthening the communities where our people and customers work and live.

Our culture is further defined by our CARES values, which are at the heart of everything we do. Protecting our people, customers, and our communities is paramount.

C	A	R	E	S
CHANGE	ACT AS ONE	RELATIONSHIPS	EQUITY & INCLUSION	SAFETY & WELLNESS
We value flexibility, innovation, and a learning culture with a willingness to take risks.	We value thinking and acting globally, doing what we say we will do and helping one another succeed.	We value acting with integrity and building lasting relationships with our Team Members, customers, suppliers, and communities.	We value a diverse and inclusive environment where everyone is treated fairly and inspired to achieve their potential.	We value the safety and health of our Team Members and our communities.

## Our Supply Chains

Martin Brower Canada operates a distinct supply chain model compared to other logistics providers. Rather than serving solely as a carrier or warehouse operator, Martin Brower Canada works in close coordination with manufacturers and suppliers to facilitate the distribution of goods to our customers. In this role, we serve as a critical link between our customers and their suppliers, ensuring continuity and reliability across the end-to-end supply chain. Martin Brower Canada purchases stock from our customers' approved suppliers to supply their corporate-owned and franchised restaurants. This model enables us to ensure a consistent and reliable flow of goods across the system. As such, our supplier relationships fall into two categories: (1) System Suppliers – vendors that supply goods to our customers' corporate-owned and franchised restaurants and from whom we purchase inventory for those restaurants; and (2) Non-System Suppliers – vendors that supply goods or services directly to us to support our own operational needs, and that are not otherwise integrated into our customers' supply chains.

## Non-System Suppliers Overview

The Martin Brower Canada supply chain includes the procurement of goods and services from approximately 1,500 active non-system suppliers. These suppliers support Martin Brower Canada's internal operations and are distinct from those supplying goods to our customers' corporate-owned and franchised restaurants. In fiscal year 2024, the majority of our indirect spend was with suppliers operating within Canada. Our non-system supplier base includes a diverse range of vendors, such as local contract transportation providers and operational expense suppliers whose services are essential to maintaining our day-to-day business functions.

Whilst our direct non-system suppliers are registered entities based in Canada and the United States and operate within North America, we acknowledge that some inputs procured by these suppliers may originate from a limited number of other regions, including select European countries and one country in Asia. Based on our current understanding and supplier disclosures, we assess the risk of modern slavery within these supply chains to be low.

Our sourcing arrangements for fiscal year 2025 include a range of goods and services essential to our operations, such as fleet and vehicle parts, consumables, IT equipment and services, personal protective equipment (PPE), uniforms, packaging, logistics support, third-party contractors, common carriers, agency labour providers, cleaning services, security services, tires, and fuel.

## Section Two: Policies & Due Diligence Processes

### Assessing & Addressing Modern Slavery Risks

Martin Brower Canada supports the objectives of the Act and affirms our commitment to responsible business practices. We take seriously our responsibility to conduct due diligence to identify, prevent and mitigate risks of forced labour and child labour in our operations and supply chains. Where potential human rights impacts are identified, we are committed to addressing them appropriately and in a timely manner.

For all Non-System Suppliers with whom we contract – such as transportation providers, cleaning companies, and waste management service providers – Martin Brower Canada requires adherence to the Martin Brower Canada Code of Conduct (the "Code"). The Code sets out our

expectations regarding fair labor practices, ethical business conduct, and compliance with applicable laws, including those prohibiting forced labor and child labor. By requiring compliance with these standards, we aim to promote safe, fair, and respectful workplace practices throughout our broader supply chain.

Martin Brower Canada has also published a Global Transparency in Supply Chain Policy, which reinforces our commitment to respecting the rights of workers across our operations and supply chain, and to contributing positively to the global communities in which we operate.

As part of our recruitment practices, Martin Brower Canada has implemented a minimum age policy that complies with all provincial legislation. The Talent Acquisition team is responsible for verifying that all candidates meet the legal minimum age requirements during the hiring process. If there is any concern that a hired individual may not meet these requirements, the matter is escalated to Human Resources for investigation and appropriate remedial action.

In connection with our customer's Supply Chain Human Rights Program (SCHRP) which applies to both Martin Brower Canada and all System Suppliers – additional safeguards are in place to prohibit the use of forced labour and child labour. The SCHRP includes third-party audits of relevant suppliers to validate compliance. In 2024, Martin Brower Canada supported our customer's human rights audit program and received confirmation that all audited suppliers were found to be in compliance with the Act.

To further enhance our due diligence efforts, Martin Brower Canada will conduct an annual review to assess whether the implementation of a supplier questionnaire is warranted for both Non-System (Direct) Suppliers and System (Customer) Suppliers operating in high-risk regions. For clarity, this questionnaire initiative is being implemented independently by Martin Brower Canada and is not part of customer's compliance program. The purpose of the questionnaire is to facilitate a supplier self-assessment and confirm compliance with applicable laws, including those relating to forced and child labour, and with the customer's supplier code of conduct.

### **Direct Suppliers**

Martin Brower Canada is committed to ensuring that all direct suppliers operate in compliance with applicable labour, employment, and immigration laws, as well as any local legislation relating to the prevention of forced labour and child labour. We will be engaging with our direct suppliers to reinforce these obligations and monitor adherence. If Martin Brower Canada identifies a breach by a direct supplier involving forced labor or child labor, we will promptly notify the supplier of the violation, suspend our working relationship during the investigation, and require the implementation of corrective actions before resuming engagement.

### **Customer Suppliers**

In addition to our direct suppliers, Martin Brower Canada also imports and distributes certain products on behalf of our customer for use in their corporate-owned and franchised restaurants (System Suppliers). Should we become aware of any indication that forced labour or child labour is being used by a customer supplier, we will immediately notify our customer to initiate investigation and appropriate corrective measures.

## *Employment Policies & Practices*

We conduct our operations in a manner that respects internationally recognized human rights, including those set out in the United Nations Declaration of Human Rights. We are committed to ethical recruitment and employment practices and to upholding labor rights across our operations and supply chain. These principles are supported by a suite of internal policies – many of which are directly relevant to the prevention of modern slavery, forced labour, and child labour.

As part of our training and compliance framework, employees are regularly reminded of their responsibility to report any conduct that may constitute, or appear to constitute, a violation of company policy. Employees may report concerns to their supervisor, higher-level management, the Office of Ethics and Compliance, the relevant business unit General Counsel, or via the Reyes Holdings Ethics Hotline.

### **Martin Brower Canada Policies**

- Guidelines of Business Conduct
- Anti-Discrimination (EEO) Policy
- Code of Conduct Policy
- Grievance Policy
- Privacy Information & Disclosure Policy
- Social Workplace Accountability Policy
- Workplace Health and Safety Policy
- Environmental Policy
- Anti-Bribery Policy
- MB Global Compliance
- Transparency in Supply Chain

Reports may be made anonymously, and all reports are treated confidentially. Martin Brower Canada strictly prohibits any form of retaliation against employees who raise concerns in good faith, report suspected misconduct or cooperate in a Company-authorized investigation.

## **Section Three: Risks of Modern Slavery Practices in Operations and Supply Chain**

Martin Brower Canada's potential exposure to modern slavery risks arises primarily through our supply chain, where we rely on a broad network of contracted and subcontracted services. The majority of our indirect spend is with established global manufacturers and brands, many of whom are either subject to the reporting obligations under the Act or have publicly available policies and procedures that demonstrate a commitment to ethical labor practices. Where available, Martin Brower Canada reviews and considers these suppliers' reports as part of our due diligence process.

Like our customer, we expect all suppliers -- regardless of cultural, social, or economic context -- to uphold fundamental human rights. This includes treating workers with fairness, respect, and dignity, and maintaining practices that ensure safe and healthy working conditions.

Based on our current knowledge and supplier engagements, Martin Brower Canada assesses the overall risk of forced labour or child labour within our supply chain to be low to minimal. As of

the date of this report, Martin Brower Canada is not aware of any instances of forced labour or child labour in our supply chain. However, these assessments are subject to the inherent limitations of our existing risk identification and due diligence process, as outlined in the relevant sections of this report.

## Section Four: Actions to Remedy Modern Slavery (Risk Identification Activities)

As noted above, Martin Brower Canada is not aware of any incidents of forced labour or child labour within our operations or supply chain during the past financial year. This assessment is subject to the limitations of our risk identification and due diligence processes, as described in more detail throughout this report. Accordingly, Martin Brower Canada has not undertaken any remedial measures in response to actual incidents of forced labour or child labour during this period. However, we have identified a range of potential remedial and risk mitigation measures, which are described in more detail below.

### Supply Chain Human Rights (SCHR) Program

As previously outlined, Martin Brower Canada's suppliers fall into two distinct categories: (1) System Suppliers and (2) Non-System Suppliers.

Our customer has implemented a Supplier Chain Human Rights Program (SCHRP) which applies to all System Suppliers, including Martin Brower. The purpose of the SCHRP is to ensure suppliers understand their responsibilities, verify their ability to comply with applicable standards, and foster continuous improvement across the supply chain.

The SCHRP has the following steps which are required to be undertaken:



System Suppliers are also required to adhere to the customer's Supplier Code of Conduct which outlines minimum expectations across key areas of human rights, workplace standards, environmental responsibility, and business integrity. The Code sets out specific obligations in the following categories:

**Human Rights and Labor Standards:** Respect for human rights; Freedom of association and collective bargaining; Prohibition of forced labor and responsible recruitment practices; Verification of legal status and documentation of workers; Protection of migrant workers, including



recruitment agency oversight; Prohibition of underage labor and protections for young workers; Non- discrimination, harassment prevention, and protection from abuse; Adherence to legal working hours and provision of adequate rest days; and Respect for land rights and provision of fair wages and benefits.

**Workplace Environment and Health & Safety:** Communication and training on emergency preparedness and safe work practices; Implementation of safety management systems, including hazard identification, reporting and remediation; Site security protocols; and access to safety equipment, emergency first aid kits, clean drinking water and sanitary facilities.

**Environment Management:** Development and implementation of sustainability programs; and Monitoring and minimizing environmental impact at both facility and supply chain levels.

**Business Integrity and Ethics:** Prohibition of corruption and bribery; Ethical business practices and transparency; Participation in audits and assessments; Proper recordkeeping and management systems; Protection of confidentiality, security and privacy; and Oversight of subcontractors and suppliers to ensure alignment with ethical standards.

**Worker Voice and Grievance Mechanisms:** Access to effective grievance mechanisms; whistleblower protections; and Procedures for confidential and retaliation-free reporting of violations.



Through our participation in SCHRP and alignment with our customer's Code of Conduct, we remain committed to promoting high standards of human rights, workplace safety, environmental responsibility, and ethical business practices across all system suppliers. We also continue to apply these principles in managing and engaging with our non-system suppliers.

In addition to the above requirements, facilities -- including System Supplier facilities -- are also required to become members of SEDEX ("Supplier Ethical Data Exchange"), a global membership organization dedicated to promoting ethical and responsible business practices in supply chains. SEDEX provides a platform for companies to share and access information related to key ethical performance areas, including labor standards, health and safety, environmental impact, and business integrity. These four focus areas also form the basis of the SMETA audit methodology.

System Supplier facilities are required to undergo periodic on-site audits in accordance with the SEDEX SMETA 4-Pillar Audit protocol. SMETA (SEDEX Members Ethical Trade Audit) is a widely recognized audit framework that consolidates multiple customer requirements to

streamline and reduce duplication of ethical and social compliance audits.

During each audit, independent auditors assess the facility's performance against the four SMETA pillars and evaluate compliance with our customer's Supplier Code of Conduct. Any instances of non-compliance are documented in a final audit report issued through the SEDEX platform. Following the audit, the facility is responsible for addressing any identified issues through a Corrective Action Plan Report ("CAPR"), which outlines both corrective and preventative actions to ensure sustainable compliance improvements over time.

### *SCHR: Effective Action*

Where non-compliance is identified through an on-site Supply Chain Human Rights (SCHR) SMETA audit, System Suppliers are required to work with an independent third-party audit firm to develop and implement a CAPR. The CAPR must include specific timeframes for the implementation of corrective actions, a root cause analysis, and updates to relevant policies or procedures. In addition, the CAPR must establish accountability and be designed to prevent the recurrence of the identified noncompliance. In cases involving significant non-compliance, system suppliers are also subject to a follow-up audit to verify that appropriate remedial measures have been implemented, and that compliance has been restored.

The SCHR program is intended to support System Suppliers in meeting our customer's ethical sourcing standards and in promoting the principles outlined in the Supplier Code of Conduct. However, in cases of persistent or serious violations of the Supplier Code of Conduct or the SMETA audit requirements, suppliers may be removed from the supply chain.

Martin Brower Canada also requires both System and Non-System Suppliers to maintain internal reporting mechanisms that allow employees to raise workplace concerns confidentially and without the fear of retaliation. These mechanisms must ensure that concerns are addressed in a timely and fair manner. Consistent with SMETA requirements, suppliers are expected to provide access to internal grievance procedures, including options for anonymous reporting.

## Section Five: Any Measures to Remediate the loss of Income to those impacted by the Elimination of Modern Slavery

As of the date of this report, Martin Brower Canada has not become aware of any loss of income resulting from the measures we have implemented to prevent and eliminate the use of forced labour and child labour in our operations or supply chains.

## Section Six: Training Provided to Employees on Modern Slavery

Martin Brower Canada provides annual training to employees to ensure they understand and adhere to our business standards. This training is designed to reinforce their commitment to ethical conduct and responsible business practices. The training program includes the following core modules:

- Annual Re-Induction Program
- Annual Ethics Certification
- Annual Anti-Bribery and Corruption Training

For System Suppliers, training is incorporated into the SMETA audit methodology through an online learning platform hosted by CEDx. This platform offers materials and guidance aimed at preventing modern slavery and supporting compliance with relevant labor standards. Training modules provide interpretation guidance for key workplace requirements, including but not limited to:

- Code Area 1: Employment is Freely Chosen
- Code Area 4: Child Labour Shall Not Be Used
- Code Area 9: No Harsh or Inhumane Treatment is Allowed.

For example, the 'Employment is Freely Chosen' module educates suppliers on practices that may constitute modern slavery, how to assess risk indicators within their facilities, and key preventative actions to mitigate such risks.

In 2024, we delivered a focused awareness training session for our Canadian Leadership Team. Moving forward, we plan to extend this training to reach a broader segment of our business, with particular emphasis on employees who regularly interact with suppliers.

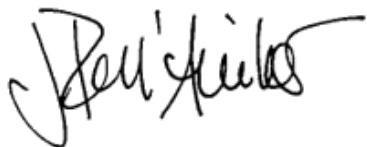
## Section Seven: Assessing Effectiveness of Actions Against Modern Slavery

On an annual basis, Martin Brower Canada will request that both direct (i.e., Non-System) suppliers and system (i.e., Customer) suppliers reaffirm or confirm that they do not use forced labour or child labour within their supply chains for products supplied to Martin Brower Canada or to our customer's corporate-owned and franchised restaurants, respectively. As previously outlined, this process will be implemented in stages, prioritizing suppliers operating in jurisdictions identified as higher risk for forced labour or child labour. Suppliers will complete a standardized questionnaire, which will be distributed and collected via Microsoft Forms. Completed responses will be stored securely in a shared folder accessible to the Human Resources team for ongoing tracking and monitoring. To ensure oversight and accountability, Martin Brower Canada will maintain a centralized tracking sheet that records the completion and review status of each supplier questionnaire. This tracking sheet will be reviewed by the President and the Vice President of Human Resources to validate supplier responses and assess overall compliance.

We will also conduct an annual review of our reporting process and documentation to identify any necessary updates, ensure continued compliance with applicable legislation, and improve the effectiveness and accuracy of the information we collect from our suppliers.

### Approval

This report has been reviewed and approved by the President of Martin Brower Canada.



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Julie Dell'Aniello  
President

Date: May 29, 2025