



INTER-CANADA FISHERIES

A Division of M.B. Product Research Distributing Inc.

IMPORTING • EXPORTING • DISTRIBUTING

Forced and Child Labour Annual Report for M.B. PRODUCT RESEARCH DISTRIBUTING INC.

PURPOSE

This annual report for the calendar year ending December 31st, 2023, has been created by M.B. Product Research Distributing Inc. ("[M.B. Product](#)" or "**We**" or "**Our**") for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting against Forced Labour and Child Labour in Supply chains Act*, SC 2023 c 9 (the "[Act](#)")

OUR COMMITMENT

M.B Product is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that M.B. Product imports into Canada.

As a responsible importer we are dedicated to ensuring customer satisfaction and continual improvement whilst safeguarding the resources, communities, and environment in which we operate. We recognize the looming risk of forced and child labour and are committed to addressing them through a collaborative approach with our suppliers and workforce so that we can understand and mitigate these risks better.

CATEGORIZATION SECTOR AND INDUSTRY

M.B. Product is an entity under the Act

In terms of the Act's threshold requirements, M.B. Product has at least \$20 million in assets for at least one of its two most recent financial years and has generated at least \$40 million in revenue for at least one of its two most recent financial years.

Our Operations

M.B. Product is the sole parent company operating in the seafood industry with headquarters in Brampton, Ontario, Canada. The organization consists of a warehousing department, sales, accounting, human resources, purchasing, customer service and supply chain/logistics/food safety teams - each of their leads reporting to the company's management. Our core business activities include: Importing seafood (frozen, canned, and fresh) globally from various suppliers, distributing products across Canada and



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exporting products to the United States.

STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

Our Supply Chain

Our supply chain department supports its distribution operations across Canada and centralizes operations of sourcing frozen and canned seafood products globally. We would describe Our supply chain as rather complex, as We source Our products from multiple suppliers spanning different locations globally (including the United States and Canada) in order to support Our distribution and export goals. The supply chain team further ensures that the suppliers meet Our quality standards, corporate requirements and has the capacity to cater to Our supply- demand.

Steps Taken by M.B. Product in 2023

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, or of goods imported into Canada, M.B. Product implemented due diligence policies and processes for identifying, addressing, and prohibiting the use of forced and/or child labour in the organization's activities and supply chains, including having a supplier code of conduct. These policies and due diligence processes are set out in the section below. M.B. Product also implemented grievance mechanisms, including developing a whistleblowing procedure. The whistleblowing procedure allows employees to report any breach of the Supplier Code of Conduct.

POLICIES AND DUE DILIGENCE PROCESSES

M.B. Product maintains several policies and processes which affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- a) Having a Supplier Code of Conduct (the "[Code](#)") that sets out the company's requirements and expectations for conducting business with prospective vendors. Our Code reiterates expectations that Our suppliers be good corporate citizens and comply with all applicable laws and regulations. Suppliers are expected to understand the business practices of their sub-suppliers and contractors and to ensure that they operate within similar guidelines.



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- b) Requesting that Our suppliers sign a Letter of Guarantee (the “[Letter](#)”), as a part of our due diligence process. The Letter requires them to attest that their organization is committed to respecting and protecting the human rights and safety of the people who work for them in accordance with all applicable state and federal laws and regulations. Suppliers must have policies preventing physical, verbal and mental abuse and shall have a framework for addressing employee grievances and deploying remediation measures wherever necessary. M.B. Product requires its suppliers to attest that they do not engage in or support the use of child labour or forced labour in their daily operations. Moreover, M.B. Product internally maintains supplier’s sustainability certificate records during the onboarding process.
- c) Circulating mandatory self-questionnaires to suppliers in order to better understand supplier labor onboarding practices, terms and conditions of employment, supply chain management, and grievance management. The result from these questionnaires helps us to enhance contractual terms with suppliers, encourages them to opt for sustainability certifications such as an MSC, a certificate which condemns forced labour and introduces measures to reduce risks of child and forced labour, as well as to opt for third party inspections in their local jurisdiction (if applicable).
- d) Maintaining a grievance mechanism whereby any information regarding the potential violation of the Code, whether discovered by M.B. Product’s employees, agents, or suppliers, shall be promptly reported to M.B. Product’s Human Resource and Logistics Department. An internal company code of conduct and ethics (the “[CoC](#)”) is in place which safeguards the rights of the employees.

FORCED LABOUR AND CHILD LABOUR RISKS

M.B. Product has started the process of identifying risks of forced labour and child labour through the aforementioned policies and due diligence processes. M.B. Product is aware that there may be higher risks associated with certain regions, goods, suppliers, and industries.

REMEDATION MEASURES

M.B. Product has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

REMEDATION OF LOSS OF INCOME



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M.B. Product has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any remediation measures for loss of income.

TRAINING PROVIDED TO EMPLOYEES

In 2023, M.B. Product did not provide training to its employees specific to forced labour or child labour. Moving forward, it will be assessing what related training may be appropriate.

ASSESSING EFFECTIVENESS

M.B. Product does not currently have specific policies and procedures in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, as outlined above, the policies and procedures that are currently in place do reduce the risk that child labour and/or forced labour is present in M.B. Product's activities and supply chain.

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 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

IN WITNESS WHEREOF the authorized signing officer(s) of M.B. Product Research Distributing Inc. have executed this report as of the effective date of the signatures set out below.

SIGNED

Michelle Benhaim-Gram

Date

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M.B. PRODUCT RESEARCH DISTRIBUTING INC.

Name: Michelle Benhaim-Gram

Title: Co-Owner

I have authority to bind M.B. Product Research Distributing Inc.

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