



Fine Choice Foods

Modern Slavery Report

2024

APPLICATION

This report (the “Report”), prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”), pertains to Fine Choice Foods Ltd. (“we”, “our”, “us”). The Report outlines steps taken during our previous financial year ended January 31, 2024 to prevent and reduce the risk that forced labour or child labour is used at any step of the procurement and production of our goods, in Canada or elsewhere, or of goods imported into Canada thereby.

The Report covers our in-scope Canadian operations and describes the actions we are taking to ensure that modern slavery is not taking place in our operations or supply chains.

OUR VISION, MISSION AND GUIDING PRINCIPLES



At Fine Choice Foods, we are committed to respecting and championing the human rights of everyone who comes into contact with our business, including our employees, agency workers, workers within our supply chain, and local communities.

We strive to ensure that every person in our direct operations and our supply chains is treated fairly and appropriately compensated for their work and consider child and forced labour to be unacceptable in our operations.

We are committed to working collaboratively with our suppliers to ensure the best outcomes for workers across our value chain.

Our vision is for “For everyone to love our food as much as we do!” and our mission is “With care and passion, we innovate Asian-inspired cuisine that is better for you and will touch the heart”.



VISION

For everyone to love our food as much as we do!

MISSION

With care and passion, we innovate Asian-inspired cuisine that is better for you and will touch the heart.

GUIDING PRINCIPLES

<p>Be Caring and Careful</p> 	<p>Honour our Roots, Embrace our Future</p> 	<p>Taste the Passion</p> 	<p>Listen, Learn, Teach and Grow</p> 	<p>Win Together</p> 	<p>Be Creative and Better Every Day</p> 
<ul style="list-style-type: none">• Safety and quality are the foundation to our success.• Caring for our people, products and customers is what we do.• We respect and cherish our planet.	<ul style="list-style-type: none">• We remember our history and show our pride in the heritage of our company.• We recognize the need to evolve to build a better future.• We are good citizens and give back to our communities.	<ul style="list-style-type: none">• We live and feel our culture.• We welcome everyone to sit at our table.• We act with courage and humility.	<ul style="list-style-type: none">• We value openness and curiosity and learn from each other.• We seek and provide honest feedback.• Be open to change, striving to grow every day.	<ul style="list-style-type: none">• We demonstrate a strong will to win as a team.• Collaborating allows us to do more together than alone.• We are accountable to ourselves and to the team.	<ul style="list-style-type: none">• Innovation is our advantage.• We continuously improve in everything we do.• We do what's right, always.

ORGANIZATIONAL STRUCTURE

Fine Choice Foods is a privately held corporation that operates with an Executive Leadership Team, led by the CEO. There are senior executives responsible for each functional department.

Located in Richmond, British Columbia, Fine Choice Foods is a market-leading producer of high-quality Asian-inspired foods for the North American market. Founded by the Lui family in 1986, Fine Choice Foods specializes in spring rolls, gyoza dumplings, and the original apple pie roll under the SUMM! brand. Starting as a small store on Cambie Street in Vancouver employing three people, today the company has grown to a staff of more than 300, serving consumers throughout Canada and the United States from two facilities totaling more than 100,000 sq ft.

Fine Choice Foods operates from a shared purpose and core set of corporate guiding principles. At Fine Choice Foods we work with non-negotiable ethics, a resilient business is one where we are building a sustainable future where all have an opportunity to thrive. To learn more about Fine Choice Foods, please visit: www.SUMMFOODS.com.



ACTIVITIES AND SUPPLY CHAINS

Raw materials are sourced, in compliance with our internal material supply policies and in conjunction with our supplier partners, from a combination of local sources and a wide international base of proven suppliers. It is then processed, packed and delivered to the retailers' distribution centres through third party logistics providers and then onto stores.

Our own operations are in some areas automated, and we have appropriate internal and external storage of raw materials and finished products.



We partner with suppliers that share our commitment to quality, food safety, employee welfare and sustainability.

We are committed to ensuring the integrity and traceability of the raw materials we use in our products, which includes vegetables, meat, ingredients, and packaging. We have developed our own supplier standards for each raw material group which clearly state the standards we expect our suppliers to adhere to.

We recognise our responsibility to workers throughout our value chain and seek to work collaboratively with our suppliers to assess and address the risks of modern slavery.

POLICIES

Code of Conduct

Fine Choice Foods Ltd. is committed to operating in accordance with the highest ethical standards and all applicable laws, rules, and regulations. We place the highest value on the integrity of each employee and Company representative. Our Company expects not only compliance with all applicable laws, rules, and regulations, but also responsible and ethical behaviour and compliance with this Code of Business Conduct and Ethics (the “Code”) as well as the policies related to the Code which are set out in the Company’s Policy Manual.

Recruitment Policy

Fine Choice Foods practices equal opportunity and fair hiring processes when filling positions, and strives to hire only the most qualified individuals, based on their knowledge, skills, abilities, and other competencies. The Company has adopted this policy to ensure that all employees and potential candidates are considered for employment opportunities through a consistent, fair, and barrier-free approach. In the interest of creating and maintaining a safe work environment for all employees, Fine Choice Foods will not employ anyone under the age of 18.

Respectful Workplace

Fine Choice Foods does not tolerate bullying, harassment or other inappropriate comment or conduct towards a person that reasonably causes humiliation, intimidation, or embarrassment. Regardless of position, showing mutual respect is a core value and work expectation at FCF. Think before you speak and do not talk or behave in a way that might intimidate, embarrass, offend or otherwise bother someone.

The purpose of the policy are to:

1.

Define standards of behaviour and conduct, foster a respectful workplace free from bullying, discrimination and harassment;

2.

Encourage timely resolution of disrespectful conduct through collaborative discussion; and

3.

Set out guidelines for formal resolution processes to resolve bullying, harassment, discrimination and other disrespectful conduct.

Policy on Forced and Child Labour

Fine Choice Foods Ltd. maintains a zero-tolerance approach to forced and child labour regardless of with whom we work and where we do business. We are committed to complying with all relevant laws concerning forced and child labour in all the countries where we operate and to preventing forced and child labour throughout our network of suppliers.

We expect our suppliers to take all reasonable steps to prevent and remediate the use of forced and child labour within their supply chains, both directly and indirectly. Should credible concerns be reported in good faith or if the presence of forced or child labour is identified in a current or potential supplier's supply chains, we will conduct a thorough assessment of our collaboration with that supplier.



Should credible concerns be reported in good faith or if the presence of forced or child labour is identified in a current or potential supplier's supply chains, we will conduct a thorough assessment of our collaboration with that supplier. Business relationships can be impacted if such issues are found and can lead to consequences (including not commencing or temporarily or permanently terminating business relationships) where appropriate.

DETERMINING AND RISK OF FORCED AND CHILD LABOUR



Internal

We believe that the risk of forced labour or child labour among our personnel is negligible. Our Vice President People and Culture along with the rest of our Executive Leadership Team oversee the application of our human resource policies. Our recruiting processes ensure compliance with the standards currently in force in Canada, where most of our personnel come from. We also recognize our personnel's right to freedom of association.

Within Our Supply Chain

We are aware that there may be a risk of forced labour at all levels of our supply chain. Currently, the company has processes in place to determine the risk of forced labour or child labour with first level suppliers.

In that regard, when it comes to our industry, we assess the risk of forced labour or child labour as being minimal in terms of our direct suppliers.

For certain types of materials, where the US department of Labour have identified specific risks by geographic region, or a specific material, the prevalence of this risk increases for suppliers located further down the supply chain. Identifying the risk for these indirect suppliers over which we have little control and visibility can prove to be complex, and we continue to make reasonable efforts to understand this.

STEPS TAKEN TO ASSESS AND MANAGE RISKS IN OUR OPERATIONS AND SUPPLY CHAINS



The supply of goods and services is governed by a certain number of operating philosophies and principles that guide our strategies and practices and which are consistent with our growth plan. All members of our supply chain also have a role to play in that regard.

We rely on the cooperation of all our suppliers and expect them to meet the highest standards of quality and ethics, as defined in our various policies and codes of conduct, and as discussed at greater length in this report.

Moreover, we count on close collaboration between the main supply stakeholders to ensure compliance and reduce risks:

- Our Corporate QA and Regulatory Department plays a supporting role in strategic sourcing as far as the food safety, environmental, social and governance strategy is concerned. It ensures that sourcing meets GFSI standards and actively participates with stakeholders in the assessment of needs and selection of goods or services.
- The procurement department also acts jointly with the QA and Regulatory Department which, for its part, actively participates in the negotiation of contracts while providing recommendations and opinions.
- We have shared our policy and expectations with our vendors and suppliers and conducted a detailed and thorough risk assessment of our primary suppliers and partners to understand their compliance level. The risk is based on intelligence and guidance provided by the US Department of Labour on the risks by geographic region and material being produced there. Where higher risks have been identified we have made all reasonable efforts to source their statement and policy on forced labour and child labour.
- This risk assessment model has now been incorporated into our existing supplier and vendor approval programme, as to ensure this important topic is covered off during any new supplier assessment.
- We work with NSF, who provides an annual compliance audit to GFSI (Global Food Safety Initiative) standards with regards to our supply chains, food safety and quality standards, and vendor management and approval.
- We are also certified to OSSE (Occupational Safety Standard of Excellence) through the Manufacturing Safety Alliance of BC. We are proud to be one of less than 1% of companies in British Columbia certified to this standard.

REMEDIATION MEASURES

In the last financial year, we did not identify any incident of forced labour or child labour in our activities or supply chain. We therefore did not need to take any measures to remediate an incident of forced labour or child labour.

If we do identify incidents of forced labour within our activities or supply chains, we will consider the appropriate remediation strategies in compliance with international standards.

TRAINING

As part of our initiatives to mobilize stakeholders around business priorities including health and safety, food safety and social issues, we encourage employees to become ambassadors of our efforts. We have developed an internal training document and package.



All salaried employees, many of whom are involved or responsible for the sourcing of materials and hiring of personnel, have been trained against the policy and the company expectations. Each one of these employees have signed to confirm they understood the training and will comply with our policy.

All non-salaried employees who are not directly involved in these activities (e.g., those involved in manufacturing), have been made aware of our policy and expectations through company notice boards. This is our typical way of publishing these important policies and ensuring people have access at all times.

ASSESSMENT OF EFFICIENCY

We have introduced certain measures over the last financial year aimed at reducing the risk that forced labour or child labour will be used in our activities and our supply chains. We have not yet taken any measure to assess the efficiency of these measures.

CONTINUOUS IMPROVEMENTS AND PROSPECTIVE INTERVENTIONS

While we are proud of the work we have done so far and are very confident we have managed risks to the best of our ability, in a reasonable fashion, we appreciate this is a journey and something we need to make continuous improvements on.

For our next fiscal calendar, we are planning to work on the following.

1. Reasonably expand our risk assessment and audit out to tier two vendors including maintenance and sanitation materials, secondary contractors and third-party logistics providers.
2. Build a more comprehensive supplier code of ethics policy and share with our vendors.
3. Make this topic an integral part of our ongoing new employee orientation programme and update our employee handbook.
4. Make the new initiatives part of our goals and objectives for this fiscal calendar.

Approval and Attestation

This report was approved by the Board of Directors of Fine Choice Foods Ltd. for the financial year ended January 31, 2024, in accordance with subparagraph 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I hereby attest that I have reviewed the information contained in the report for the entity listed above. To the best of my knowledge, and after having exercised due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



A handwritten signature in black ink, appearing to read 'J Longden', written in a cursive style.

Jason Longden

Director and Chief Executive Officer.

I have the authority to bind Fine Choice Foods Ltd.

