	Bill S-211- Report to the Exec. Team	
	Created By: Chief Operating Officer	Initial Date: May 23, 2024
	Approved By: IFC Exec. Team	Review Date: May 25, 2026
	Revision#: New Document	

This is the May 2024 Bill S-211 Report that is required in accordance with *Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the Act).


This report dated May 25, 2025, covers the fiscal year of Inovata Foods Corporation (IFC) of May 1, 2025, to April 30, 2026. IFC operates within the food manufacturing sector in the following three provinces of Canada; British Columbia, Alberta, and Ontario.

Bill S-211 requires qualifying Entities to be responsible for, and to do whatever is reasonable to ensure that exploitative practices are addressed and eradicated from the Supply Chain.

Inovata Foods takes this responsibility very seriously and has taken a number of steps to ensure that the company is suitably identifying risks associated with forced and child labour in our Supply Chain, as well as implementing internal checks to ensure that all new and existing employees are of suitable work age and have accepted their roles willingly and without being coerced in any way.

Inovata Foods Corporation has taken the following steps:

- Developed and prepared an Exec-1010 Forced Labour and Child Labour in the Supply Chain Policy – Bill S-211.
- The policy was reviewed by the Executive Team, signed off as approved and implemented.
- A Bill S-211 Supply Chain Audit Checklist was developed and prepared.
- The Corporate Purchasing Director was given the responsibility of sending the Bill S-211 Supply Chain Audit Checklist to all new and existing Vendors/Suppliers.
- Completed Bill S-211 Supply Chain Audit Checklists are reviewed by the Quality Support Specialist and any issues brought to the attention of the Chief Operating Officer.
- Any Vendor/Supplier who is identified as using Forced or Child Labour will be removed from our Approved Vendor/Supplier List.
- HR in all facilities have a procedure in place to check the dates of birth of all new and existing employees to ensure that we do not have any underage employees.

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- HR provides Offer Letters to all proposed employees and these individuals are allowed to sign off to accept roles of their own free will and without any coercion.


Other Applicable Inovata Foods Policies:

Exec-1010 Forced Labour in the Supply Chain Policy – Bill-S-211

COM-1030 - Privacy Policy and Compliance

COM-1090 - Corporate Social Responsibility Policy

Reviewed by IFC Exec Group on document; *Bill S-211 – Approval & Attestation.*

	Bill S-211- Approval & Attestation	
	Created By: Chief Operating Officer	Initial Date: May 23, 2024
	Approved By: IFC Officer Team	Review Date: May 2026
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In accordance with the requirements of the Act, and in particular Section 11 thereof, we attest that we have reviewed the information contained in the report for this entity. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the financial reporting year May 1, 2025, to April 30, 2026.

OTHER APPLICABLE POLICIES:

Exec-1010 Forced Labour Child Labour in the Supply Chain Policy – Bill S-211

APPROVALS:

X *Chad Parsons* _____ **date** _____

Chad Parsons
President

I have the authority to bind Inovata Foods Corporation.

X *Darren Wight* _____ **date** _____

Darren Wight
Chief Financial Officer

I have the authority to bind Inovata Foods Corporation.






Bill S-211 - Approvals & Attestation Document - May 2026


Final Audit Report

2026-05-26

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	Forced Labour & Child Labour in the Supply Chain Policy	EXEC-1010
	Created By: Brian Gallacher	Initial Date: Nov 27 2022
	Approved By: IFC Executive Team	Last Review Date: May 2026
	Version 02	

Introduction:

This policy has been developed to ensure that Inovata Foods complies with Bill S-211, an act to enact the Fighting Against Forced Labour and Child Labour in the Supply Chain Act, that received Royal Assent on May 11, 2023. This bill came into force January 1, 2024.

This Act imposes an obligation on certain entities to submit an annual report to the Minister of Public Safety by May 31 of each year on the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains. Inovata Foods falls within the criteria for entities that must comply with this legislation.

Scope:

This policy applies to all Inovata Foods employee recruitment and hires, as well as all Supply Chain relationships with vendors/suppliers who present a risk regarding forced and child labour.

Inovata Foods will comply with this legislation by having HR procedures in place to ensure that all employees are of working age, join the company willingly and without being coerced, compelled, constrained or obliged to become an employee.


Insofar as the Supply Chain is concerned, Inovata Foods will conduct a risk-based approach to vendors/suppliers to identify those that provide a potential risk of forced and child labour by virtue of their location, known issues of non-compliance in the country of origin and any cultural indications that forced, or child labour could be used.

Responsibilities and Prevention:

The Corporate HR Director is responsible for ensuring that Inovata Foods has systems in place to check and verify the age of all potential and current employees, to confirm that they are of official working age.

The Corporate HR Director is also responsible for ensuring that prospective employees are provided with an Employment Offer Letter detailing the terms and conditions of the employment offer. The prospective employee will be free to make an informed decision regarding their acceptance of the role without being coerced, compelled, constrained, or obliged to become an employee.

The Corporate Purchasing Director is responsible for conducting a risk assessment of new and existing vendors/suppliers to identify any risk of these companies using forced, or child labour by virtue of their location, known issues of non-compliance in the country of origin and any cultural indications that forced, or child labour could be used.

	Forced Labour & Child Labour in the Supply Chain Policy	EXEC-1010
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Procedure/Method:

Internal Age Check

HR will require all prospective employees to confirm their age and their eligibility to work for Inovata Foods, by providing their Valid Driving License, Birth Certificate, or similar I.D. with their date of birth included. This item will be copied, the date of birth confirmed as eligible to work, a hard copy held in the employee files and the date of birth recorded in the employee electronic record. Only prospective employees who meet the minimum age requirements are entitled to be employed at Inovata Foods.

This same procedure will be completed for any “temp to perm” employment, as we treat all temporary workers in the same way as we do our own employees.


Vendor/Supplier Compliance Check

All new and existing Vendors/Suppliers will be provided with and expected to complete and submit a Forced or Child Labour Audit Checklist or provide Inovata Foods with confirmation that they have already completed a similar third-party audit, with a submission of the result to Inovata Foods. Only vendors/suppliers who suitably confirm that they have policies/procedures in place to prevent forced, or child labour will be used by Inovata Foods.

Remediation:

In the event that any vendor or supplier engaged in business with us is utilizing child labor within the scope of their operations, we will take immediate action to suspend all business relations with the affected party. Furthermore, where applicable, we will notify the relevant authorities in accordance with legal and regulatory requirements. We will also implement corrective measures to address and rectify the situation.

- **Supplier Education and Training:** Support training initiatives for suppliers on ethical labor practices and the legal implications of child labor, ensuring they fully understand the company's policies and expectations.
- **Audit and Monitoring:** Conducting regular audits of suppliers to identify and address any issues related to child labor. This may include audit requests from external providers.
- **Contract Termination:** If a supplier is unwilling or unable to correct the issue, terminating the business relationship and seeking alternative suppliers who comply with ethical labor standards.
- **Engagement with NGOs and Local Authorities:** Collaborating with non-governmental organizations (NGOs) or local authorities to support communities affected by child labor, helping to create sustainable solutions and alternatives for affected children.

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COMPANY RIGHTS

Inovata Foods Corp. maintains the right to address individual situations regarding the introduction of this policy manual. It is important to note that this policy is to be considered as a guideline and:

1. Inovata Foods Corp., at its option, may change, delete, suspend or discontinue any part or parts of this policy at any time without prior notice as business, employment legislation, and economic conditions dictate.
2. Policy changes will apply to currently hired employees as well as to future employees.
3. No one other than an Officer of Inovata Foods Corp. may authorize the revision of this policy.
4. All policies must be signed by at least two Officers of the company.
5. All policies are reviewed and tracked annually.
6. Policy signatures will be updated if one of the following occurs; policy is deemed required for an updated signature at least annually, change on the officer team, a content change in the policy or 3 years from signature has passed.


OTHER APPLICABLE POLICIES:

APPROVALS – All Officers below are required to sign this policy.

X *Chad Parsons*
Chad Parsons
Chief Executive Officer


X *Darren Wight*
Darren Wight
Chief Financial Officer

Inovata Foods Corp has determined employees are not required to sign off on this policy but recommends all employees be familiar with company policies and will make all policies accessible to employees.

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Appendix A
Tracked Changes

Reviewed May 2026 by Elise Lamothe, Corp. HR Director No updates	Version 02 cont
Reviewed January 24, 2025 by Elise Lamothe, Corp. HR Director Add prevention and remediation plan.	Version 02
Reviewed July 2, 2024 by Elise Lamothe, Corp. HR Director Updated formatting, no content changes	Version 01 cont.
Reviewed March 3, 2023 by Elise Lamothe, Corp. HR Manager Updated formatting, no content changes	Version 01 cont.
Policy created and reviewed November 17 2022	Version 01

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Appendix B Bills S-211 Audit Checklist

Forced Labour in Canadian Supply Chains

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced through former Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), aim to increase industry awareness and transparency and drive businesses to improve practices.

PLEASE COMPLETE ALL SECTIONS OF THIS BILLS-211 AUDIT CHECKLIST

ITEM	BILLS-211 STANDARD	AUDIT CHECKLIST QUESTION	YES/NO	DOCUMENT VERIFICATION	ATTACHED	COMMENTS
1	The organisation should be able to demonstrate that they have policies and procedures in place to prevent forced and child labour.	Has your organisation recently completed a Social Responsibility Audit?		Attach a copy of your Social Responsibility Audit including the results and any remedial action required.		
2	A policy should be in place to confirm the organisations commitment to preventing forced and child labour.	Does the organisation have a recently reviewed policy that deals with their commitment to prevent forced and child labour?		Attach a copy of the organisations policy that demonstrates this commitment.		
3	The organisation should have competent HR and Management personnel dealing with labour recruitment, who understand the legal requirement to prevent forced and child labour.	Are HR and Management responsible for labour recruitment suitably trained and competent to understand their responsibility to prevent forced and child labour?		Attach details of training provided to personnel responsible for labour recruitment.		
4	The organisation should have procedures in place to verify the age of employees before employment.	Does your organisation have a procedure in place to check the suitable age of prospective employees before moving forward with employment?		If this procedure is documented please attach a copy, otherwise please detail the procedure in the "Comments" column.		
5	The organisation should ensure that any agencies providing recruitment support are suitably preventing forced and child labour with candidates & employees within their area of control.	How does the organisation ensure that any temporary or temp to perm labour provided by external recruitment agencies are suitably screened to prevent forced or child labour?		Attach any policies or procedures that demonstrate this control is in place or provide suitable comments.		
6	The organisation should have systems in place to retain employee records including proof of age and confirmation that job acceptance was without duress.	How does the organisation maintain records of employees including proof of age and confirmation that job acceptance was without duress?		Attach any policies or procedures that demonstrate that a system of record keeping is in place and effectively maintaining records of suitable checks to prevent forced and child labour. Provide comments as required.		
	The organisation should have measures in place to allow employees to refuse excessive working hours outside of local legal employment standards or regulations.	Does the organisation ensure that employees can refuse excessive working hours and are working hours in accordance with local employment standards or regulations?		Attach any policies or procedures to control working hours and provide detailed comments regarding local working hours limits.		
8	All employees should receive a Letter of Employment confirming reasonable and consistent terms and conditions and prospective employees should be willingly allowed to accept or decline employment offers.	Can you confirm that all employees are provided with a Letter of Employment confirming reasonable and consistent terms and conditions and prospective employees should be willingly allowed to accept or decline employment offers?		Attach a sample copy of a Letter of Employment along with any policies associated with recruitment and employment practices.		
9	Where foreign workers are employed, employers are responsible for ensuring the eligibility of workers by seeing and getting copies of appropriate Visas etc.	Do you employ any Foreign Workers and if so, do you make suitable checks of eligibility to work and that there are no forced or child labour issues?		Please provide comments and attach any supporting documentation.		
10	Organisations must take suitable and effective measures where forced or child labour is recognised to eliminate this practice immediately and put in place remedial action to prevent a reoccurrence.	Has the organisation recognised forced or child labour taking place and if so, what actions has been taken to eliminate this practice and put in place remedial action to prevent a reoccurrence?		Please provide comments and attach any supporting documentation.		

COMPLETED BY (PRINT NAME):

POSITION:

SIGNED:









EXEC-1010 - Forced Labour Child Labour in the Supply Chain Policy - Bill S-211

Final Audit Report

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