



**Roquette Canada Ltd. | a member of the
Roquette Group**

2025 Report

**to the Minister of Public Safety Regarding Forced Labour and Child Labour
Pursuant to 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
("Modern Slavery Act")
Fiscal Year 2024**

1. Roquette Canada Ltd.'s structure, activities, and supply chains.

Structure. At Roquette, we are united behind a shared purpose – offering the best of nature. Roquette Canada Ltd. (hereinafter “Roquette Canada”) is part of the Roquette Group, a global leader in plant-based ingredients and a supplier of pharmaceutical excipients. Roquette Canada is incorporated under the laws of Canada and is located at 40117 Road 65N, Portage la Prairie, MB R1N 3B5. Roquette Canada is a subsidiary of Roquette Frères, which has global headquarters in France. Roquette Canada, as a member of the Roquette Group and a subsidiary of Roquette Frères, substantially relies upon the efforts of the Roquette Group and Roquette Frères for the purposes of managing and monitoring its supply chain operations and compliance programs.

Roquette Canada has one location in Canada, a pea protein plant in Portage la Prairie, located outside of Winnipeg, in Manitoba. Roquette Canada employs between 100 to 150 employees. Roquette Canada is not a federal Crown corporation or a subsidiary of a federal Crown corporation. Roquette Canada is submitting this Report based on its 2024 financial year and this is its first report for this topic; this is not an amendment of a prior report nor is it a joint report.

Activities and Supply Chain. Globally, the Roquette Group is a family-owned global leader in plant-based ingredients and a leading provider of pharmaceutical excipients. Founded in 1933, the company currently operates in more than 100 countries, with more than 30 production sites, and employs around 10,000 people worldwide. In 2021, Roquette Canada's new pea protein plant opened and is focused on the business of converting yellow peas into various products for its customers including pea protein and starch. Roquette Canada procures goods and raw materials from Canada and the United States and sells pea protein and starch to customers both within Canada and outside of Canada, largely to the United States, Mexico and China.

2. The steps the entity has taken during its previous financial year 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 by the entity or of goods imported into Canada by the entity.

The Roquette Group and Roquette Canada are committed to reducing the risk of forced labour and child labour both in Canada and globally. Our ethics and compliance strategy is founded on the Roquette values, our Code of Conduct, and our SpeakUp system. Compliance with applicable laws and the principles of integrity, honesty, and ethical business practices are at the heart of who we are, the products and services we deliver, and how we conduct ourselves. Respect for human rights is a fundamental part of Roquette's framework of actions. The Roquette Group ensures that its business practices are based on fair wages, safe working conditions and non-discriminatory policies.

In 2024, the Roquette Group was awarded an EcoVadis gold medal due to a significant increase in its score from 50 in 2022 to 77 in 2024. Roquette now ranks in the top 15% of companies evaluated worldwide. EcoVadis assesses more than 125,000 companies worldwide, analyzing criteria covering environmental impact, human resources management, ethical practices, and sustainability. For

Roquette, this medal reflects its progress, distinguishes its commitment and performance in these areas, and highlights the dynamics associated with achieving its goals.

The Roquette Group and Roquette Canada have also taken a number of steps in fiscal year 2024 to prevent and reduce the risk that forced labour or child labour is used in the production of goods in Canada or elsewhere.

Specifically, Roquette Canada maintains a Supplier Code of Conduct based on several foundational documents: the Universal Declaration of Human Rights, the principles of the United Nations Global Compact, the International Labor Organization convention, and Roquette's own Code of Conduct. The Supplier Code of Conduct says that suppliers shall prohibit forced labor and child labor in compliance with, among others, the fundamental ILO conventions. Roquette Canada enforces and measures compliance with the Supplier Code of Conduct through various measures explained more fully throughout this Report. Roquette has been a member of the United Nations Global Compact since 2009, committing to respecting and promoting ten principles relating to human rights, labor standards, and the environment and anti-corruption. And in 2024, Roquette joined the French organization Entreprises pour les Droits de l'Homme (e-dh), reinforcing its commitment to respecting human rights throughout its value chain. These actions show Roquette's determination to conduct its business in an ethical and responsible manner.

Since 2024, the Roquette Group and Roquette Canada require 100% of all new suppliers, vendors and contractors that do business with Roquette to sign the Roquette Supplier Code of Conduct through a new automated qualification process. New suppliers must also complete a questionnaire covering topics such as human rights, labor law, human health and safety, and anti-corruption. Roquette's contracts also allow Roquette to terminate a supplier, vendor or contractor if they violate the Supplier Code of Conduct. The Roquette Supplier Code of Conduct is publicly available at [Roquette Supplier Code of Conduct](#).

The Roquette Group is committed to respecting human rights in its business activities and relationships and adheres to the Universal Declaration of Human Rights, the ILO conventions, and supports the UN Global Compact. The Group conducts business under the following beliefs:

- All forms of modern slavery, including forced labor and human trafficking, are prohibited;
- Child labor below the minimum age set down in ILO standards is prohibited;
- The right of association, including for trade unions and political affiliations, must be respected;
- Pay must be at least equal to the legal minimum wage in each country;
- All employees have the right to a fair defense in situations of conflict; and
- Suppliers must apply standards at least equivalent to those of the Roquette Group.

For details on the policies and public statements that the Roquette Group and Roquette Canada have made on these topics in 2024, please refer to the audited Roquette Group Annual Report which is publicly available at [Roquette Group Annual Report](#).

3. Roquette Canada's policies and its due diligence processes in relation to forced labour and child labour.

The Roquette values are authenticity, excellence, well-being, and forward-looking. These values shape all that we do.

The Roquette Group and Roquette Canada have a Global Code of Conduct that strictly and expressly forbids all forms of modern slavery, including forced labor and human trafficking, as well as forbidding all forms of labor for children under the minimum age set by International Labor Organization (ILO) standards. The Roquette Global Code of Conduct is publicly available at [Roquette Code of Conduct](#). The Code of Conduct is incorporated into Roquette's terms and conditions of sale that it uses with its customers, and is also part of Roquette's mandatory onboarding and training of all employees as further described below.

Roquette Canada has set up several channels for whistleblowers so that any employee can report behavior they feel breaches the above fundamental rights to their line manager or to the Human Resources department. A whistleblowing system called SpeakUp has been set up, which is an anonymous digital platform open to all employees as well as external partners. The whistleblower guide guarantees the protection of any whistleblower acting in good faith and the absence of any retaliatory measures of any form or nature whatsoever. This guide is available on the intranet in the Group's nine languages. Anyone can call to report a complaint anonymously. Roquette is committed to maintaining a "Speak Up" culture by promoting an open and trusting dialogue with employees at all levels and other stakeholders. Roquette advises its employees that if they wish to report a potential violation of the law, or improper or unethical behavior, they may raise a question or report a concern using the Roquette Speak Up system. Roquette protects those who Speak Up and raise concerns appropriately; Roquette does not retaliate against anyone who raises a concern, or against those who assist in investigations of suspected violations.

There were no cases of human rights violations in 2024. Additionally, the Roquette Group did not have any fines, penalties, or compensation for damages in connection with human rights incidents.

Additionally, Roquette Canada uses a background check software called Exiger to vet and perform due diligence over all clients, suppliers, and third parties. The software detects both adverse media reports and articles as well as criminal or legal violations related to both child labour and forced labour of any third party. Roquette Canada would not work with a third party that has been found to be in violation of forced labour or child labour laws or policies.

Roquette Group and Roquette Canada's commitments towards the prevention of forced labour and child labour are further evidenced by Roquette's membership in the UN Global Compact, an initiative that identifies ten principles for corporate sustainability and a principles-based approach to doing business. This includes operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence. The UN principle number four is for the elimination of all forms of forced and compulsory labour and principle number five is for the effective

abolition of child labour. The UN Global Compact page showing Roquette's membership is publicly available at [Roquette | UN Global Compact](#) and the UN Global Compact ten principles are publicly available at [The Ten Principles | UN Global Compact](#).

The Roquette Group has established processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, as follows:

- A supplier code of Conduct is available on the Roquette public website and also required from each partner during their qualification and listing phase;
- A supplier management strategy including, in particular, the obligation for suppliers to complete a CSR questionnaire covering such topics as policies for human rights, ISO45001 certification, and the Ecovadis Score) as part of the listing process, which enables Roquette to know their degree of compliance and maturity and informs decision-making; and
- The Group is committed to qualifying 100% of its strategic suppliers with respect to CSR criteria by 2030.

Finally, to manage material risks, Roquette has set targets to strengthen its supply chain resilience and promote positive impacts on the well-being of workers in the supply chain. The three main actions include: supplier diversification; improved performance related to sustainability factors in the supply chain; and a search for suppliers offering so-called more sustainable technologies. The action plans are implemented and monitored using Easy Performance which is a supplier performance review tool.

4. The parts of Roquette Canada's business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.

Roquette Canada recognizes that the Act requires entities to identify parts of their activities and supply chains that carry a risk of forced labour or child labour; however, identifying parts of an entity's activities and supply chains that carry a risk does not require indicating that forced labour or child labour was or is actually being used.

Roquette Canada has considered the ways in which its activities and supply chains could potentially cause, contribute to or be directly or indirectly linked to actual or potential risk that forced labour or child labour is used, and, although Roquette Canada has not identified any forced labor and child labor within its own activities or within its supply chain, Roquette Canada has nonetheless implemented strict hiring policies, such that every new employee has to sign the Roquette Code of Conduct to ensure that no underage employees are hired and all new hires are on a voluntary basis, both of which are part of Roquette Canada's human resources policies.

With regard to supply chain, Roquette Canada recognizes that the risk cannot be eliminated in the supply of raw materials by farmers, however, to minimize this risk, every supplier has to sign the Roquette Supplier Code of Conduct and spot audits will be performed.

Additionally, Roquette recently performed corruption risk mapping and theoretical risks have been identified; the solution to prevent against such theoretical risks will be ad hoc auditing.

5. Any measures taken to remediate any forced labour or child labour.

Roquette Canada is not aware of a situation where remedial actions have been necessary. Roquette Canada will continue to educate its employees and enforce its policies going forward.

6. Any measures taken to remediate 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 its activities and supply chains.

Roquette Canada is not aware of a situation where remedial actions for loss of income have been necessary. Roquette Canada will continue to educate its employees and enforce its policies going forward.

7. The training provided to employees on forced labour and child labour.

Roquette Canada requires all employees to be trained each year on the Global Code of Conduct. Additionally, Roquette's Code states that each employee is responsible for being familiar with and complying with all applicable labor laws and regulations, and reporting any behaviors which go against any individual's fundamental rights to a manager or the Human Resources Department.

Roquette Canada also held training sessions on site and in person by the Chief Compliance Officer and local Roquette Canada management. The training covered all areas of the corporate due diligence obligations including the fight against forced labor and child labor. One of the objectives of the training was to explain that big companies such as Roquette have specific obligations and enhanced responsibility to monitor and remedy the potential adverse impacts of its own activities and those of its value chain on human rights and on the environment.

8. How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

To reduce and prevent the risk of forced and child labour within our operations and supply chains, we assess the effectiveness of our actions to continuously improve our compliance program.

Roquette Canada closely monitors the whistleblowing alerts that are received and each case is investigated by a neutral alert committee at a corporate level. Sanctions are systematically applied where a breach is substantiated. To date, no breach relating to forced labor and child labor has been demonstrated within Roquette Group or Roquette Canada. In addition, both the compliance function and the implementation of the compliance program are subject to regular internal and external audits.

Additionally, the Roquette Group conducted corruption risk mapping in order to determine strengths and weaknesses for different types of risks, and forced labour and child labour were included in the mapping.

The table below identifies a comprehensive picture of all efforts taken by Roquette Group.

| Activity | Measuring Effectiveness |
|-----------------------------------|--|
| Governance | <ul style="list-style-type: none"> • Publication of audited Roquette Group Annual Report demonstrating human rights and anti- forced labor policies and statistics • Mandatory employee compliance with Global Code of Conduct upon onboarding • Annual mandatory Code of Conduct training for all employees globally • Required adherence by Suppliers to Supplier Code of Conduct • Inclusion of Code of Conduct in terms and conditions of sale with customers |
| Engagement | <ul style="list-style-type: none"> • EcoVadis gold medal awarded for 2024 for Roquette's commitment and high scores for sustainability and ethical practices • Membership to UN Global Compact identifying ten principles of corporate social responsibility including prohibition and abolition of forced and child labour • Membership to Entreprises pour les Droits de l'Homme (e-dh), reinforcing commitment to respecting human rights throughout its value chain |
| Enterprise Risk Management | <ul style="list-style-type: none"> • Corruption risk mapping |
| Monitoring | <ul style="list-style-type: none"> • Vendor and supplier due diligence and screening through Exiger • Ad hoc audits, internal and external • Right to audit vendors and suppliers included in downstream contracts |
| Grievance Mechanism | <ul style="list-style-type: none"> • Speak Up, an anonymous online / phone platform operated by an independent provider, with alerts monitored by committee and investigated without retaliation |

9. Attestation.

This Report was approved by our Board of Directors on May 14, 2025.

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 or entities 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.

DocuSigned by:
Brendon Boland
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Brendon Boland

Chief Financial Officer of Roquette Canada Ltd.

May 29, 2025

I have the authority to bind Roquette Canada Ltd.