



Introduction

Highbury Canco (“Highbury”) is committed to the protection of human rights in all its business practices, operations and supply chains. This includes the prevention of modern slavery, forced labour and child labour in both our internal business practices and supply chain operations. Highbury commits to lawful and ethical conduct in all our business operations and decision-making processes. Highbury conducts its business in accordance with the law and regulatory policy as stated in the Highbury Code of Conduct.

Integrity, honesty and fairness are the core values that are woven into our business operations. We adopt these values and maintain truthful relations with all individuals and companies we conduct business with.

Structure, Activities & Supply Chain

Highbury Canco (“Highbury”) operates as a corporation at 148 Erie Street, South Leamington, Ontario. The financial reporting year of Highbury covered by this report is December 30th, 2024, to December 31st, 2025. Highbury satisfies the definition of an Entity within the Act by having a place of business in Canada, conducting business in Canada, having assets in Canada and meeting two of the three size-related thresholds. Highbury employs 530 staff members, with the entirety of our workforce residing in Ontario.

Structure

Highbury is a Canadian food processing company that specializes in packaging and processing a variety of food products, including canned goods, beverages, sauces, and condiments. We operate in a modern facility equipped with state-of-the-art technology to ensure high-quality products and efficient production processes. Our expertise lies in processing a wide range of food products to meet the diverse needs of our customers. From classic canned goods like fruits and vegetables to refreshing beverages, flavorful sauces, and delicious condiments, we have a passion for delivering high-quality products that bring joy to every table. In addition to our commitment to quality, sustainability is a core value that drives everything we do. We continuously explore ways to minimize our environmental footprint, from optimizing our production processes to sourcing ingredients responsibly.

This is the first version of the report submitted and the report is for the entity Highbury. There are no other reporting requirements under other jurisdictions.



Activities

Highbury operates primarily in the food processing sector. As a food processing company, we specialize in taking raw agricultural products and transforming them into packaged foods ready for consumption. This sector encompasses a wide range of activities, including canning, bottling, freezing, and packaging various food items such as fruits, vegetables, beverages, sauces, and condiments. Our focus is on delivering high-quality and nutritious products to consumers while also prioritizing innovation, sustainability, and customer satisfaction.

In addition to food processing and packaging operations, Highbury engages in innovation and product development by collaborating with customers to develop new food products and packaging solutions. This may involve experimenting with different recipes, flavors, and packaging formats to meet consumer preferences and market trends.

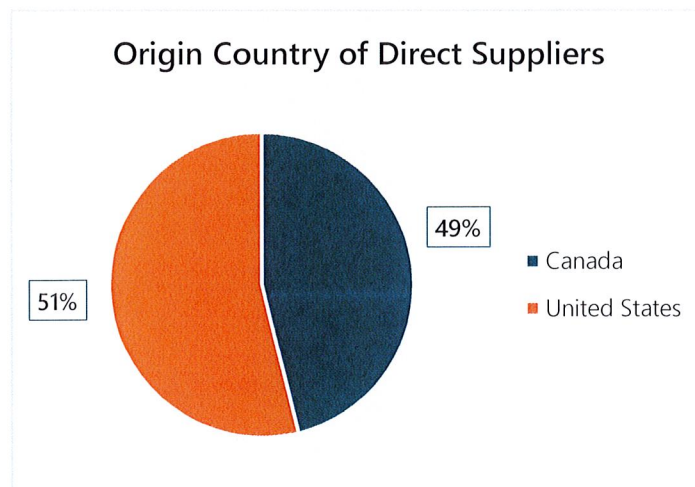


Figure 1

Supply Chain

Highbury directly procures goods from companies operating out of the United States (U.S.) and Canada. It is possible that some vendors have parent companies residing outside of North America. We have analyzed the office addresses of all our vendors and found that they are mostly North American (see *Figure 1*). Highbury currently has limited visibility on the full geographical reach of its suppliers' locations and limited knowledge of the origination of where suppliers source their goods.

As part of the best practices identified during Highbury's 2024 Bill S-211 reporting, Highbury conducted a targeted supplier survey in 2025. The 33-question survey was distributed to all suppliers exceeding the designated spend threshold. Highbury received 123 completed responses, providing greater insight into supplier practices and gained additional visibility in their supply chains.

Highbury procures its goods from two origin countries. While we know that some of their vendors purchase goods from foreign countries, we do not know the full extent to where our vendors purchase their goods from. We are also aware that we purchase finished goods that are made up of many different components and materials.

Figure 1 represents the makeup of our supply chain by country and total purchasing spend. Countries accounting for less than 0.5% of the total purchasing spend were not included in the risk assessment analysis. Highbury has 228 direct suppliers, with 98 of our vendors located in the U.S. and 84 in Canada. Highbury procured approximately 80% of goods directly from entities in the United States and Canada.



Policies & Due Diligence

Highbury Canco (“Highbury”) has the following internal policies in place relevant to this Act:

Policy	Description	Support in Mitigating Risk of Modern Slavery
Code of Business Conduct	<ul style="list-style-type: none"> Principles that define desired behaviours and ethical standards for Highbury’s employees and staff. The code promotes integrity, professionalism, and ethical decision-making, and good judgement. 	<p>A code of conduct sets cultural standards and a dedication to be accountable for doing what is right. Employees are required to speak up if they identify any injustices in Highbury’s operations or code of ethics. It is part of our duty to our members and stakeholders.</p>
Sustainable Development	<ul style="list-style-type: none"> Outlines Highbury’s commitment to balancing economic growth, social progress, and environmental protection to meet the needs of the present without compromising the ability of future generations to meet their own needs. 	<p>A sustainable development policy provides a framework for companies to integrate social, environmental, and ethical considerations into their business operations, contributing to the prevention of child labour and forced labour. By promoting responsible business practices, companies can play a crucial role in advancing the fight against exploitation and abuse in global supply chains.</p>
Union Collective Agreement	<ul style="list-style-type: none"> Outlines the terms and conditions of employment for the workers covered by the Unions, addressing various aspects of working conditions, wages, benefits, and rights in the workplace. 	<p>Union agreements can empower workers to negotiate for fair wages, safe working conditions, and develop policies that protect against exploitation. Unions monitor workplaces, advocate for stronger labour laws, provide support networks, and collaborate internationally to address labour abuses. By establishing legally binding contracts that prioritize worker well-being, union agreements serve as a critical tool in the fight against child labour and/or forced labour.</p>



Communication & Professional Etiquette	<ul style="list-style-type: none">Establishes Highbury's expectations regarding communication norms and professional behavior, ensuring that employees understand the standards they are expected to uphold in their interactions with colleagues, clients, and stakeholders.	A communication and professional etiquette policy fosters a positive workplace culture by setting clear expectations for respectful behavior and effective communication. This promotes ethical standards, encourages open dialogue and supports collaboration to indirectly contribute to the fight against instances of child labour and forced labour.
Diversity & Inclusion	<ul style="list-style-type: none">Outlines the Highbury's commitment to promoting diversity and fostering an inclusive environment where staff members feel supported and empowered to succeed. This policy establishes guidelines and initiatives aimed at eliminating discrimination, bias, and barriers to participation.	By ensuring equal access to employment opportunities and career advancement for all individuals, regardless of background, the policy helps create pathways to economic empowerment that can reduce vulnerability to child labour and forced labour.
Workplace Violence & Harassment	<ul style="list-style-type: none">Outlines Highbury's stance against harassment and violence and establishes procedures and guidelines for reporting incidents of violence, intimidation, harassment, sexual harassment and bullying on company premises, at company events or while conducting company business.	A clear harassment policy establishes a safe and respectful workplace environment. The policy outlines the method for reporting any issues employees encounter, including instances of violence that may lead to cases of child labour and/or forced labour within Highbury's internal operations.



Due Diligence with the Suppliers

Highbury Canco (“Highbury”) has an established Vendor Approval Policy that outlines a structured process for supplier selection and evaluation. This policy is designed to reduce risks associated with sourcing raw materials and ingredients by applying rigorous food safety standards. These include assessments of biological, chemical, and physical hazards, as well as economically motivated risks. As part of the initial vetting process, suppliers are required to submit product specifications, a letter of guarantee, a certificate of conformance, and a vendor questionnaire. Upon completion, approved suppliers are added to Highbury’s Approved Vendors Registry.

More than 50% of Highbury’s suppliers have also been vetted by Fortune 500 food companies, who require adherence to a formal Code of Conduct. These Codes include explicit prohibitions against forced labour and child labour and help to reinforce legal and ethical compliance throughout the supply chain. This added layer of oversight strengthens Highbury’s due diligence practices and reduces exposure to human rights violations.

The Approved Vendors Registry is reviewed monthly to ensure documentation remains current and compliant with applicable food safety guidelines. In addition, the top 80% of Highbury’s suppliers by spend are reviewed annually, covering areas such as invoice accuracy, shipment timeliness, product quality, and overall relationship performance. Highbury reserves the right to disqualify vendors for issues such as non-compliance, expired certifications, product recalls, or service failures. Ad hoc supplier visits are also conducted in response to quality or production concerns. While these visits have traditionally focused on operational matters, Highbury plans to expand them to include compliance assessments related to Bill S-211, particularly in relation to forced labour and child labour risks.

In support of the requirements outlined in Bill S-211, Highbury surveyed the supplier base again in 2025. This 33-question survey was specifically designed to evaluate supplier awareness, policies, and practices regarding forced labour and child labour. It was distributed to all suppliers exceeding a defined spend threshold. The results—123 completed responses—provided Highbury with critical insight into the level of compliance across its supply chain. All survey data is stored in a centralized system, enabling Highbury to better assess risks and monitor ethical performance over time. Moving forward, this survey will be conducted annually as part of our broader commitment to responsible sourcing and regulatory compliance. In 2025, Highbury conducted follow-up reviews on responses from the 2024 supplier survey related to Bill S-211. Two suppliers were initially flagged for potential concerns; both cases were investigated and ultimately cleared with no suspicion or evidence of non-compliance.



Risk Assessment

A risk assessment of the goods procured by Highbury Canco (“Highbury”) and countries from which the goods are procured from has been performed in relation to the Act. This risk assessment used two separate indices to conclude on inherent risk of forced labour and child labour related to goods and countries — Walk Free’s Global Slavery Index and the US Department of Labour’s List of Goods Produced by Child Labour or Forced Labour.

While we know that some of our vendors purchase goods from foreign countries, we do not know the full extent to where our vendors purchase their goods from. We are also aware that we purchase highly finished goods built with multiple materials and that each material may contain a different risk profile for supply chain risks.

Goods Procured

For the purposes of assessing risk associated with goods in Highbury’s supply chain, we evaluated product categories making up at least 0.5% percent of total procurement spend for fiscal year 2024. Any product categories below 0.5% percent of total procurement are deemed immaterial for this assessment and excluded from the analysis. As a result, the top 38 of Highbury’s suppliers — amounting to 80% of total procurement spend, were considered in the risk assessment.

The risk assessment has been conducted of Highbury’s goods procured identified inherent risks of forced labour and/or child labour within certain goods or materials from which products are made.

A risk assessment has been conducted on Highbury’s primary goods procured, and has identified initial inherent risks of forced labour and/or child labour within the following categories:

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- | | | |
|--------------|--------------|-----------------|
| • Tomatoes | • Sunflowers | • Salt |
| • Glass | • Beans | • Pepper |
| • Iron | • Onions | • Chile peppers |
| • Sugarcanes | • Garlic | • Timber |
| • Rubber | | |
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Highbury does not procure all the listed goods directly. For example, when procuring cans and closures, the metal may be derived from steel which is a byproduct of iron. Therefore, Highbury has identified the risks associated with certain materials that are used in the production of finished goods that our company purchases.

Other high-volume goods procured by Highbury include plastic polymers, food additives, bell peppers and parsley. These remaining goods were not directly identified within the two noted indices; therefore, they carry low inherent risk of forced labour and child labour. As part of Highbury’s ongoing efforts to strengthen upstream supply chain oversight, the company will use the category risk assessment which



has identify higher risk categories and compare those findings against the 2025 supplier survey responses. This approach will help Highbury target and reduce risk within specific categories where vulnerabilities may exist. Once responses are collected, any non-compliant answers are reviewed and the required follow-up details are investigated. To date, no non-compliant suppliers have been identified.

Countries of Procured Goods

For assessing country associated risks of forced labour and/or child labour, Highbury evaluated suppliers using the *Walk Free Global Slavery Index* and the *U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour*, we conducted a risk assessment on the countries of operations of our vendors. Our analysis found that all our vendors are from North America. According to both global benchmarks, there is low inherent risk exposure of forced labour and child labour identified since Highbury's vendors are all located in Canada and the United States. This does not mean that forced labour or child labour does not exist in the supply chains of our suppliers.

Highbury is aware that some of its suppliers have headquarters in foreign countries and that these supplier may procure their goods from other regions or other suppliers, but at this time, Highbury does not know the full extent of where all suppliers' goods are sourced from.

Mitigating Activities

To mitigate the risk of child labour and forced labour within our supply chains, Highbury incorporates the following mechanisms for supplier onboarding and monitoring:

1. Supplier Onboarding

- a. **Vendor Approval Process:** Highbury's Vendor Approval policy requires all vendors supplying raw materials, ingredients, or packaging materials to go through an internal assessment before being added to the Approved Vendor Registry. This procedure includes an initial assessment that ensures a supplier's compliance with food safety standards. Following the initial assessment there is a Quality Assurance (QA) assessment that reviews any additional requirements for vendors supplying medium-high risk goods. Once approved, the supplier is added to Highbury's Approved Vendors Registry. Though this assessment does not currently incorporate aspects related to this Act, Highbury is considering implementing clauses requiring suppliers to attest to not using child labour or forced labour in their operations or supply chains. In addition to Highbury's internal onboarding process, 50% of our suppliers are vetted by Fortune 500 companies that require suppliers to sign a Supplier Code of Conduct that prohibits the use of forced labour and child labour in their operations.
- b. **Supplier Disqualification:** Within the Vendor Approval policy, Highbury lists conditions for which a supplier may be disqualified. This includes discontinuation of material, poor



service or quality, lapsed certification, recalls, customer requests and/or other complaints. There is an opportunity for Highbury to add a clause relating to the conditions of the Act, noting that suppliers must comply with Highbury's domestic laws or Highbury can reserve the right to terminate the vendor's agreement.

2. Supplier Monitoring

- a. **Ongoing Review:** The Approved Vendor Registry is reviewed monthly to identify suppliers with expired, or soon-to-be expiring documentation/certifications. If certificates are not reissued within 60 days of expiration, a Vendor Quality Notification is used to communicate concerns to suppliers, request corrective action and evaluate supplier performance.
- b. **Annual Reviews:** Highbury's top 80% of suppliers have annual reviews conducted on their performance. This review currently includes discussions on product quality, delivery, and any other stakeholder concerns. There is an opportunity to include questions that meet the conditions of the Act.
- c. **Onsite Visits:** Currently, these visits are conducted ad hoc when experiencing manufacturing or quality-related issues. By directly observing working conditions, Highbury can also assess whether the supplier's practices align with ethical standards.

3. Supplier Questionnaire:

In line with the plan established in 2023, Highbury launched its first supplier questionnaire in 2024. This initiative is now embedded as part of Highbury's annual supplier management process and applies to all suppliers that exceed the defined spend threshold. The 33-question survey focused on key compliance areas, including child labour and forced labour risks. The 2025 survey generated strong participation, with 123 completed responses, providing meaningful visibility into supplier practices and alignment with Highbury's ethical sourcing standards. All responses are captured within a centralized system to support ongoing risk assessment and continuous monitoring. Importantly, all participating suppliers confirmed compliance with local minimum age requirements and applicable labour regulations, including working hour limits.

4. Internal Policies

Despite having no reported instances of forced labour or child labour identified within Highbury's operating activities, Highbury is committed to continually developing internal capabilities and controls that reduce the risk of forced labour and/or child labour within our supply chain.

Remediation forced labour & child labour & vulnerable family income loss

Highbury Canco ("Highbury") is in the process of mapping the full depth of its supply chain and



continues to review procurement practices to strengthen the rigor of its due diligence processes. This includes ongoing efforts to raise awareness among suppliers. With the help of the supplier survey tool, Highbury has not identified or suspected any instances of forced labour or child labour within its operations or those of its suppliers. As a result, no remediation measures have been required with respect to forced labour or child labour.

Awareness Training

Highbury requires new employees to review Highbury's Code of Conduct and other policies that are relevant to this Act as part of their orientation. When onboarding new employees, part of this process includes reviewing the code to ensure the individual understands Highbury's standards and expectations. Sections within the code of conduct that are relevant to the Act include discrimination and harassment, diversity and inclusion, sustainable growth, and confidentiality and anonymity.

Highbury currently provides relevant training through its Alchemy platform and recognizes the opportunity to further strengthen employee awareness in alignment with this Act. To that end, Highbury is evaluating the integration of targeted training on forced labour and child labour for applicable procurement staff in the future.

Assessing Effectiveness

To track Highbury Canco's ("Highbury") effectiveness of procedures to mitigate the risk of child labour and forced labour, the following mechanisms are in place:

Highbury Internal Processes

1. **Harassment incidents:** Highbury has a zero-tolerance for discrimination and harassment. All claims made regarding harassment will be reported to Management. Where an investigation is warranted, Highbury will ensure an unbiased, impartial investigation is conducted.
2. **Conduct and behaviour incidents:** Full compliance with Highbury's Code of Conduct is expected of all employees. As a condition of employment, all new employees must sign a Certificate of Acknowledgement, stating that they have read the Code of Conduct and understand that they are required to comply with outlined conduct and behaviour. In addition, employees may be required to complete and sign an annual certificate confirming that they have complied with the Code. Individuals who do not complete certificates may be subject to disciplinary action.
3. **Employee training:** Highbury has integrated Bill S-211 training into its annual Alchemy training program. This includes dedicated content on child labour and forced labour, focused on helping employees identify, assess, and report any perceived or actual instances within the supply chain or operations.



Supplier Activities

1. **Supplier questionnaire:** Insights gained from the supplier survey will enhance Highbury's visibility into its supply chain. The data collected will enable Highbury to more effectively assess and manage risk across its supplier base.
2. **Vendor Approval:** Highbury plans to implement a clause within the Vendor Approval policy regarding a zero-tolerance for child labour and forced labour. This clause aims to identify the outcome or, disciplinary action should any instances of child labour or forced labour be reported or discovered by Highbury.
3. **Supplier visits:** When performing onsite supplier visits, Highbury will review an onsite questionnaire which will integrate questions related to forced labour and child labour with which suppliers will be interviewed. Highbury will keep all questionnaires on a centralized workplace where responses can be updated for each visit. Highbury will track responses to understand what suppliers are doing to mitigate the risk of child and forced labour.
4. **Supplier performance reviews:** Key suppliers of Highbury are reviewed on an annual basis to ensure compliance with contract terms and conditions. These reviews can serve as an opportunity to review findings from site visits and supplier questionnaires. Record keeping for frequency of reviews and date of last review will be kept on a centralized data base to ensure these reviews are being performed.

Steps Taken to Prevent & Reduce Risk of Forced Labour or Child Labour

Highbury Canco ("Highbury") has taken the following steps to prevent and reduce the risk of forced labour or child labour:

1. Conducting an internal risk assessment of forced labour and/or child labour in the organization's activities and supply chains. Highbury has identified goods within the supply chain that have inherent risks of forced labour and/or child labour in this report.
2. Implementing reporting policies and procedures that create a culture where employees feel safe and capable of reporting instances of forced labour and/or child labour or any other form of suspected exploitation.
3. Addressing practices in our organization's activities and supply chains that increase the risk of forced labour and child labour: Remediation efforts related to due diligence processes have been identified to reduce the risk of forced labour and/or child labour within the supply chain.
4. Developing due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.



5. Implementing anti-forced labour and/or anti-child labour conditions: Highbury has identified the opportunity to integrate conditions within the Vendor Approval policies related to forced labour and child labour.
6. Monitoring suppliers: Highbury conducts supplier reviews and onsite visits for key suppliers as part of its ongoing relationship management. Moving forward, these activities will be aligned to help verify compliance with labour laws, including those related to forced and child labour. Highbury will continue to leverage insights from the 2025 supplier survey to strengthen these efforts and inform future risk assessments.
7. Enacting measures to provide for, or cooperate in, remediation of forced labour and child labour: Mitigating activities have been identified to reduce the risk of forced labour and child labour within supply chains. See risk assessment section for further explanation.
8. Developing and implementing training and awareness materials on forced labour and child labour: Highbury has expanded its training program to include content specific to forced labour and child labour. Company-wide training is now delivered through the Alchemy platform to ensure baseline awareness across all employees. In addition, an opportunity for specialized training and review sessions for the procurement team, focusing on how to identify, assess, and address risks related to these issues within the supply chain.

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 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.

Sam Djab

Full Name

Samuel

Signature

CEO

Title

May 1st, 2026

Date



I have the authority to bind Highbury Canco Corporation and this report covers financial year 2025 and applies to Highbury Canco Corporation and all entities considered reporting entities in terms of the Act and any controlling subsidiaries of Highbury Canco Corporation if they apply.