



*Forced Labour and Child Labour in Supply Chains Company Assessment*



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## Table of Contents

**Introduction** ..... 3

**Structure, Activities & Supply Chain** ..... 3

**Policies** ..... 3

**Due Diligence** ..... 5

**Supply Chain Risk Assessment** ..... 5

**Remediation of Forced & Child Labour as well as Remediation of Vulnerable Family Income Loss** ..... 6

**Awareness Training** ..... 6

**Assessing Effectiveness** ..... 6

**Steps Taken to Prevent and Reduce Risk of Child Labour or Forced Labour** ..... 7



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## **Introduction**

This report is prepared by 2551194 Ontario Inc. (operating as “Kettlemans Bagel” or “Kettlemans”) for the financial reporting year of 2024. Kettlemans Bagel operates only in Canada and does not have any other similar reporting obligations outside of Canada. This is our first report submission and we meet 2 out of the 3 Bill S-211 reporting requirements related to total assets and number of employees.

Kettlemans is committed to upholding ethical practices and ensuring that forced labour and child labour are not utilized within our supply chains. In accordance with the Bill S-211, *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, Kettlemans has implemented a range of measures to prevent and mitigate these risks throughout our operations.

## **Structure, Activities & Supply Chain**

### *Structure*

Kettlemans is a privately held company that operates in Canada, with a head office in Ottawa, Ontario. Kettlemans has physical locations in Ottawa, Toronto, and Montreal.

### *Activities*

Kettlemans’ operational activities include the following:

- Bake Montreal-style bagels for retail and wholesale purposes;
- Prepare a variety of bagel sandwiches using bagels made in-house; and
- Sell accompanying food items including cream cheese, drinks, and desserts.

### *Supply Chain*

Kettlemans operates within a simple network of a few suppliers involved in the preparation and transportation of our goods. Our activities fall within the food service industry, therefore many products are prepared within Canada.

All of our suppliers physically reside within Canada, which is considered to have low inherent risk related to child and forced labour. Bagels are baked in-store, using employees hired directly by Kettlemans.

## **Policies**

### Current Policies

Kettlemans has taken proactive steps to prevent and reduce the risk of forced labour and child labour within our supply chains. This includes comprehensive training programs for employees, vetting of



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suppliers, and establishing clear reporting procedures for suspected instances of forced labour and child labour.

#### *Labour and hiring policies*

Our Learning Management Software (LMS) contains several employment policies and resources for employee access. Our hiring process is robust, which collects all relevant personal information of each employee including date of birth and social insurance number to ensure that each employee is legally authorized to be employed in Canada in accordance with applicable laws and regulations. Work permits, if applicable, are provided and regularly monitored by the Human Resources department to ensure that these individuals remain legally authorized to work in Canada during their employment with Kettlemans.

Our employment contracts are also clear around the minimum hiring age for each employee at Kettlemans. The minimum age of hire is 14, and these individuals are only permitted to perform certain tasks which are clearly outlined in the employment contract. This excludes operating any heavy equipment or machinery, and no use of any sharp objects such as kitchen knives. Any individual hired at 16 or older is permitted to work all tasks at Kettlemans.

#### *No Retaliation policy*

Kettlemans has established clear reporting procedures for employees to follow if they suspect instances of forced labour or child labour. These procedures are outlined within the LMS for employee access and are central to the culture of our Company. Employees are instructed to notify their supervisor, manager, or the Human Resources department immediately if they observe or suspect any such practices taking place. The notified individual is then responsible for documenting the report and initiating an investigation in coordination with the appropriate departments. All reports are treated confidentially, and Kettlemans ensures that there will be no retaliation against employees who report in good faith. This procedure not only helps in promptly addressing any issues but also reinforces Kettlemans' zero-tolerance policy towards forced labour and child labour.

#### *Employee rights*

Kettlemans ensures that all employees are informed of their rights under the provincial and federal employment laws. Links to the *Employment Standards Act (ESA)* and *Canada Labour Code (CLC)* are readily available within our LMS.



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## **Due Diligence**

### *Goods Suppliers*

Kettlemans maintains a small core group of suppliers that are chosen based on their business integrity and ethical standards. Before entering into any agreement with a supplier, we perform thorough background checks, analyzing any publicly available information and directly interviewing executives to ensure that they are upholding the highest ethical standards in their business practices.

Kettlemans pays particular attention to goods assessed to have the highest inherent risk, based on our supplier risk assessment below, to determine the amount of due diligence completed to prevent and mitigate the risk of forced child labour within our supply chain.

### *In-store and Head Office Employees*

During onboarding, we meet every new employee in person. All our employee guidelines are discussed above in the Current Policies section. The inherent risk of this category is low.

## **Supply Chain Risk Assessment**

### *Geographic Supplier Locations*

All the suppliers used operate out of countries that are considered to have lower inherent risks associated with child and forced labour. 99% of our suppliers and spend are within Canada, with less than 1% of suppliers and spend based in the United States.

### *Good Purchased Locations*

Kettlemans also performed a risk assessment on the type of goods purchased. Most of the products were deemed to have a lower inherent risk, although some had a moderate or higher risk. This risk stems from the country in which they are grown or produced, which has a higher risk of child or forced labour. However, we manage this risk by ensuring we do business with companies with established policies related to the prevention of child or forced labour. The table below illustrates the risks associated with goods purchased:



Goods	Inherent risk per good	Country	Inherent risk per country	Overall Risk
Food ingredients, including protein, dairy, produce and flour	Low	Canada / United States	Low	Low
Food ingredients, including sesame seeds	Moderate	Nigeria	High	Moderate
Food packaging	Low	Turkey	Moderate	Low
Sanitary Supplies	Low	Canada	Low	Low
Professional services	Low	Canada / United States	Low	Low

### **Remediation of Forced & Child Labour as well as Remediation of Vulnerable Family Income Loss**

Kettlemans has not identified any supplier employing forced labour or child labour in our supply chain or within Kettlemans. For this reason, no remediation has been required. However, we are an ethically conscious organization, and if these ever arise, remediation of the situation will be investigated and addressed.

### **Awareness Training**

#### *Employee Training*

While Kettlemans does not provide comprehensive training on forced and child labour, there is a general awareness that is provided to employees during orientation as part of the core values of Kettlemans. Resources are made available upon request, and supporting documents related to Kettlemans internal policies are provided within our learning management software.

### **Assessing Effectiveness**

No actions have been taken by Kettlemans to assess effectiveness in preventing and reducing risks of forced labour and child labour.



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## **Steps Taken to Prevent and Reduce Risk of Child Labour or Forced Labour**

### *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.

A handwritten signature in black ink, appearing to read "Robert Thuot".

Robert Thuot  
Vice President, Finance  
December 20, 2024

I have the authority to bind Kettlemans Bagel.