

**MONETTE GROUP**

Report Pursuant to the *Fighting Against  
Forced Labour and Child Labour in Supply Chains Act*

Fiscal Year 2023

## **1. Introduction**

Monette Group is committed to conducting its business operations with a strong emphasis on environmental sustainability, social responsibility, and good governance.

Our vision at Monette Group is to feed a billion people through sustainable agriculture. We strive to create a world where everyone has access to healthy, nutritious food, and to empower farmers to produce food in a way that is both economically and environmentally sustainable. We believe that by investing in innovative technologies, sustainable farming practices, and education, we can make a lasting impact on global food security.

Forced labour and child labour go against our core values. We do not allow these practices within our company or among our suppliers and subcontractors. We expect everyone—directors, officers, employees, suppliers, and subsidiaries—to act with integrity and follow the laws and regulations in the regions where we operate. If these standards are not met, we will take appropriate action.

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) mandates that businesses disclose the measures they have implemented during the fiscal year to prevent and mitigate the risk of forced labour and child labour within their operations and supply chain. This document is the report for Monette Farms Ltd., including its subsidiaries, which have an obligation to publish a report under the Act (collectively, “Monette Group” or the “Company”). This report covers the fiscal year ending in 2023.

## **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**

For the fiscal year of 2023, Monette Group had not yet taken any steps to prevent and reduce the risk that forced labour or child labour was being used at any step of the production of goods in Canada or elsewhere.

To prevent and reduce the risk for the fiscal year of 2024, Monette will be:

- a) conducting an internal assessment of risks of forced labour and/or child labour in our organization’s activities and supply chains;
- b) developing and implementing a policy for addressing forced labour/and or child labour;
- c) requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains;
- d) developing and implementing anti-forced labour and/or -child labour contractual clauses; and
- e) Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists.

## **3. Monette Group’s Structure, Activities and Supply Chains**

Monette Group has farm operations in Saskatchewan, Manitoba, Montana, Colorado, and Arizona. In addition to its row crop operations, Monette Group also has ranch operations in British Columbia, Alberta, and Saskatchewan. Lastly, Monette Group has seed processing facilities – two in Saskatchewan and one in Arizona. In all of our operations we strive to maintain the highest standards in terms of compliance with applicable employment law.

Monette Group purchases its inputs, including fertilizer, sprays, and seeds, and its machinery, including rolling and stationary stock, exclusively from large, reputable companies that have a strong history of compliance with applicable statutes and regulations.

#### **4. Monette Group's policies and due diligence processes in relation to forced labour and child labour**

Monette Group maintains a comprehensive set of policies and procedures designed to uphold ethical standards across all facets of its operations. While these existing policies and procedures are not exclusively focused on preventing and mitigating the risks associated with forced labour and child labour, they inherently contribute to reducing these risks. This is achieved through overarching commitments to integrity, compliance with legal standards, and the promotion of safe and fair working conditions. These measures collectively foster an environment that discourages unethical labour practices, thereby indirectly aiding in the prevention and reduction of forced labour and child labour within our operations and supply chains. Nevertheless, Monette Group acknowledges the need for more targeted policies and is committed to developing specific frameworks and initiatives to address these critical issues directly in the coming fiscal year.

First and foremost, Monette Group has a Whistleblowing Policy (the “**WBP**”) that encourages employees, contractors, suppliers, and stakeholders to report any concerns regarding misconduct, fraud, illegal activities, or violations of our policies and procedures. The WBP applies to all employees, contractors, suppliers, volunteers, and other stakeholders who have a business relationship with Monette Group. The WBP covers concerns related to unethical conduct, financial wrongdoing, violations of laws and regulations, safety issues, and other matters that impact the organization's mission and values. The WBP is reviewed periodically to ensure its effectiveness and compliance with evolving legal and regulatory requirements.

In addition to the WBP, Monette Group has a Health & Safety Policy (the “**HSP**”). The HSP outlines Monette Group's commitment to maintaining high standards of safety and health, complying with all applicable laws and regulations, and continuously improving our safety performance.

#### **5. The parts of Monette Group'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**

Monette Group acknowledges that certain parts of its business and supply chains may carry a higher risk of forced labour or child labour. Our extensive agricultural operations, spanning across Saskatchewan, Manitoba, Montana, Colorado, Arizona, and British Columbia, involve a diverse network of suppliers and subcontractors. Despite this diversity, Monette Group predominantly partners with reputable North American suppliers known for their adherence to labour laws and regulations. The vast majority of our suppliers are based domestically in Canada and the United States.

To assess and manage the risk of forced labour or child labour, Monette Group will be implementing a comprehensive due diligence framework. This framework will include ongoing risk assessments and internal education to identify high-risk areas within our supply chains. If an area of high risk is identified, the Monette Group will conduct an audit of such high risk area, involving any number of the following actions, as appropriate: on-site inspections, worker interviews, and thorough reviews of employment practices to ensure compliance with our stringent ethical standards.

Additionally, we will be establishing a strict supplier vetting process, which will mandate that all suppliers adhere to our policies prohibiting forced and child labour. Continuous engagement with our suppliers will further reinforce our commitment to ethical labour practices, ensuring that all parties are aware of and adhere to our high standards. By taking these proactive measures, Monette Group strives to mitigate the risks of forced labour and child labour, ensuring that our operations and supply chains remain free from these unethical practices.

**6. Any measures taken to remediate any forced labour or child labour**

As of the date of this report, there have been no identified or reported cases of forced labour or child labour within our operations and supply chains.

**7. 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 Monette Group's activities and supply chains**

As of the date of this report, there have been no identified or reported cases of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour within our operations and supply chains.

**8. The training provided to employees on forced labour and child labour**

During the previous fiscal year, Monette Group did not have specific training programs implemented on the topics of forced labour and child labour. However, recognizing the importance of addressing these critical issues, Monette Group will be incorporating a new policy on forced labour and child labour into the 2024 employee handbook. This new policy outlines comprehensive measures to educate and train all employees on identifying, preventing, and reporting instances of forced labour and child labour. The policy mandates annual training sessions for all employees, which cover the legal definitions, indicators, and reporting mechanisms related to forced and child labour. Additionally, the policy establishes a zero-tolerance stance towards these unethical practices and details the procedures for conducting regular audits and due diligence assessments within the supply chain to ensure compliance with Monette Group's ethical standards. By implementing this policy, Monette Group aims to foster a more informed and vigilant workforce, dedicated to maintaining high ethical standards in all aspects of its operations.

**9. How Monette Group assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

Monette Group will be employing a multifaceted approach to assess its effectiveness in ensuring that forced labour and child labour are not present in its business and supply chains.

The approach will consist of conducting regular assessments of our operations and supply chains. These assessments will include on-site inspections, worker interviews, and reviews of employment records to verify compliance with our ethical standards.

The Monette Groups WBP allows employees and other stakeholders to report any concerns related to forced or child labour confidentially and without fear of retaliation. We also track key performance indicators (KPIs) related to labour practices, and these metrics are reviewed quarterly by our executive team to identify any areas requiring improvement. Furthermore, we engage in continuous dialogue with our suppliers, providing them with resources to help them uphold our standards. By integrating these measures, Monette Group strives to create a transparent, accountable, and ethically responsible supply chain.

**10. 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.

**MONETTE GROUP**

Per:   
Darrel Monette (May 29, 2024 10:51 AM)  
\_\_\_\_\_  
Darrel Monette  
President  
May 29, 2024  
I have the authority to bind Monette Group.

# Monette Group - Bill s-211 Report - Final - May 29, 2024

Final Audit Report

2024-05-29

Created:	2024-05-29
By:	Adrienne Brabandt (adrienne@monettefarms.ca)
Status:	Signed
Transaction ID:	CBJCHBCAABAAJ88xVBde0CbyezKwBbHH1ISWDHb6NOtH

## "Monette Group - Bill s-211 Report - Final - May 29, 2024" History

-  Document created by Adrienne Brabandt (adrienne@monettefarms.ca)  
2024-05-29 - 10:28:55 PM GMT
-  Document emailed to Darrel Monette (darrel@monettefarms.ca) for signature  
2024-05-29 - 10:28:58 PM GMT
-  Email viewed by Darrel Monette (darrel@monettefarms.ca)  
2024-05-29 - 10:56:54 PM GMT
-  Document e-signed by Darrel Monette (darrel@monettefarms.ca)  
Signature Date: 2024-05-29 - 10:57:16 PM GMT - Time Source: server
-  Agreement completed.  
2024-05-29 - 10:57:16 PM GMT