

# **Forced Labour in Canadian Supply Chains**

**Neerlandia Co-op**

MAY 29, 2025

## Table of Contents

|                                                                                     |   |
|-------------------------------------------------------------------------------------|---|
| Introduction .....                                                                  | 3 |
| 1. Structure, Activities and Supply Chain.....                                      | 3 |
| Structure.....                                                                      | 3 |
| Activities .....                                                                    | 3 |
| Supply Chain .....                                                                  | 4 |
| 2. Policies and Due Diligence Processes in Relation to Forced and Child Labour..... | 4 |
| 3. Identification of Risks .....                                                    | 5 |
| 4. Remediation of Forced and Child Labour .....                                     | 6 |
| 5. Remediation of Loss of Income.....                                               | 7 |
| 6. Employee Training .....                                                          | 7 |
| 7. Efficacy of Actions.....                                                         | 7 |
| 8. Approval and Attestation of the Report.....                                      | 8 |

## Introduction

This report is Neerlandia Co-op's response to comply with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) for the financial year ending October 31, 2024. In this Statement, the terms 'the Co-op', 'we', 'us', and 'our' refer to the Neerlandia Co-operative Association Limited. The reporting entity covered by this statement is Neerlandia Co-op, business number 103846531.

For the purposes of the Act, Neerlandia Co-op meets the entity definition by having a business in Canada, doing business in Canada and meeting two of the three threshold criteria for revenue, assets and employees. Neerlandia Co-op is subject to reporting obligations under the Act by producing goods in Canada and importing goods produced outside Canada. Neerlandia Co-op is incorporated provincially and is obligated to submit a report to the Minister of Public Safety and provide a public report in response to the Supply Chains Act by May 31, 2025.

Neerlandia Co-op is committed to continuous improvement in the areas of identification and remediation of forced and child labour in operations as well as local and global supply chains. Further, Neerlandia Co-op is committed to respecting all human rights, in accordance with applicable law and the principles set forth in international standards, including the UN's Declaration of Human Rights, the UN Rights of Indigenous Peoples and UN Guiding Principles on Business and Human Rights.

Guided by core values of Integrity, Excellence, Relationship, Communities and Accountability, Neerlandia Co-op is committed to making ethical business decisions and taking proactive measures to address issues such as forced and child labour.

## 1. Structure, Activities and Supply Chain

### Structure

Based in Neerlandia, Alberta, Neerlandia Co-op is one of over 150 independent retail co-operatives from across Western Canada that make up the Co-operative Retailing System (CRS) and own Federated Co-operatives Limited (FCL). Neerlandia Co-op is in turn owned by 3,324 members in Alberta. As part of the CRS, Neerlandia Co-op helps build, feed and fuel individuals and our local communities. We employ 75 individuals.

### Activities

Neerlandia Co-op business is largely business-to-consumer focused on serving the communities in which we operate. Our core retail lines of business include food, liquor,

automotive repair centre, agriculture, home, building materials and fuel.

## Supply Chain

### Wholesale and Retail Trade

FCL sources and distributes products across many primary consumer and business lines to Neerlandia Co-op including food, home and building supplies, crop inputs, agricultural equipment, livestock feed, propane, lubricants, automotive repair centre and petroleum. Neerlandia Co-op sources 85% of the products for resale from FCL. These products are purchased by FCL from within Canada or imported and distributed throughout the CRS using FCL's fleet, distribution centres, bulk fuel distribution centres, fuel terminals and fertilizer plants.

The remaining 15% of products are sourced by Neerlandia Co-op from wholesalers and retailers primarily located in Canada, with a very small portion sourced from wholesalers in the USA and Europe

### Wholesale and Retail Trade: Products Sourced for Resale

| CATEGORY                   | DESCRIPTION                                                                                     |
|----------------------------|-------------------------------------------------------------------------------------------------|
| AGRICULTURE                | Agricultural equipment, crop protection products, fertilizer and feed                           |
| ENERGY                     | Fuel, lubricants, propane                                                                       |
| FOOD                       | Grocery, Produce, Meat, Deli, Liquor                                                            |
| HOME AND BUILDING SUPPLIES | Hardware, lumber, building materials, tools, paint, seasonal, plumbing, and electrical products |

## 2. Policies and Due Diligence Processes in Relation to Forced and Child Labour

Neerlandia Co-op maintains Compliance and Ethics policies to which all employees must adhere, confirmed through an annual Code of Conduct attestation. Neerlandia Co-op has an established internal process for anonymous reporting of actual or potential wrongdoing including any actual or potential violation of law, regulation, policy and procedure. Procedures are put in place to protect the anonymity of whistle-blowers from retaliation. Neerlandia Co-op's Senior Leadership Team regularly reviews human resource related policies to ensure Neerlandia Co-op remains in compliance with applicable workplace and labour legislation.

In 2024, Neerlandia Co-op updated to the Employment Policy to affirm that the Canadian Labour Code and respective Provincial Labour Standards are abided by. Further, the updated

policy states that all employees must be hired voluntarily and under no circumstances will Neerlandia Co-op engage in or support the use of forced labour, whether through coercion, threats or any form of intimidation. Under no circumstances will the youth employment standards of the respective province of employment be violated, including age restrictions, working hours and conditions of employment. While these employment practices have always been upheld by Neerlandia Co-op, including this language in policy affirms Neerlandia Co-op's commitment to ethical employment standards.

Neerlandia Co-op is exploring the implementation of effective grievance and remediation mechanisms in effort to address concerns or potential cases of forced and child labour in the supply chain. Neerlandia Co-op's goal is to prioritize the reporting and remediation of forced and child labour incidents, protect victims and prevent future cases. Potential mechanisms may include:

- Development of a remediation framework with information on when to safeguard the victim, develop and implement a corrective action plan with the employer, alert national authorities and consult a third-party expert organization;
- Implementation of a software solution to audit suppliers; or
- Develop a grievance mechanism that suppliers' employees can access anonymously in a format that is inclusive and accessible.

### **3. Identification of Risks**

Neerlandia Co-op's main supplier, FCL, accounts for 85% of total procured goods. In assessing the risk of forced and child labour at the direct supplier level for this relationship, FCL has concluded on the following assessment of the use of forced and child labour within their supply chain, using two separate indices - Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor:

1. Goods procured within food categories:
  - a. An inherent risk of forced and child labour has been identified within the food categories of 1) protein foods (specifically seafood); 2) beverages (specifically coffee); and 3) other (specifically chocolate). FCL has a sustainable seafood policy, Social Responsibility agreements with private label food suppliers, a Supplier Certification with national brand food suppliers and, sources several fair-trade-certified products to mitigate these risks.
2. Goods procured for home building centres:
  - a. Key suppliers of FCL's home building centres import from China, which has been identified as a country with a high inherent risk of forced and child labour. To

mitigate this risk, FCL requires key suppliers to sign a Social Responsibility agreement. The agreement requires suppliers to ensure they are supporting commitments to responsible sourcing and provide workers with fair wages and working hours, as well as a safe, clean, and healthy work environment. In 2024 employees in the FCL home and building supplies team travelled overseas for factory visitations, where they conducted informal auditing and monitoring of 40 selected suppliers. No incidences of forced or child labour were observed.

3. Goods procured for fertilizer:

- a. FCL sources 100% of potash and sulphate products from Canadian producers which would be considered a low risk for forced and child labour. Further, 85% of urea is sourced from Canadian producers, 9% from North American producers outside of Canada, and the remaining 6% from international import sources outside of North America. Urea, like fertilizer in general, is not considered an at-risk good for forced and child labour. Only 6% of urea purchased by FCL is sourced from unknown international producers, reinforcing its classification as a low-risk good for Neerlandia Co-op.

FCL is exploring opportunities to understand and reduce the risk of forced and child labour within their supply chain therefore, Neerlandia Co-op will be relying on this on-going assessment to continue assessing goods procured from FCL.

The remaining 15% of goods purchased by Neerlandia Co-op are procured from outside of FCL. These product lines are sourced from several different countries, including Canada, USA and the Netherlands. Key suppliers of Neerlandia Co-op's sporting goods, automotive repair shop and building materials retail lines may import goods from China. Using two separate indices, Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, China has been identified as a high inherent risk country for forced and/or child labour. Neerlandia Co-op is exploring opportunities to implement a supplier code of conduct and supplier questionnaires to minimise this inherent risk.

Neerlandia Co-op's supply chain mapping activities were limited to our most material non FCL suppliers. Materiality was determined by selecting our top 25 non FCL suppliers by total spend in 2024, representing approximately 67% of our non FCL supplier spending. This includes spend with transportation companies involved in the supply chain.

## 4. Remediation of Forced and Child Labour

Neerlandia Co-op has taken action to remediate potential risks of forced and child labour through deployment of the policies and procedures outlined in Section 2 of the report. In the future,

Neerlandia Co-op will explore opportunities to increase auditing and monitoring of suppliers to reduce the risk of forced and child labour. If specific incidents of forced and child labour are identified, Neerlandia Co-op will work with suppliers to determine and implement remedial action.

## **5. Remediation of Loss of Income**

Neerlandia Co-op has not identified any instances of forced and child labour in operations or supply chains; therefore, no measures have been taken to remediate the loss of income to vulnerable families.

## **6. Employee Training**

Annual training and attestation are currently required for all employees to ensure compliance with Neerlandia Co-op's Code of Conduct on company ethical standards, policies, laws and regulations. The Code of Conduct is applicable to everyone that conducts business on behalf of the organization, which includes the Neerlandia Co-op Board of Directors, the Senior Leadership Team and all current and new employees.

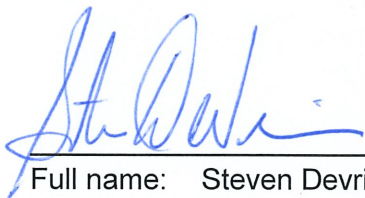
In 2024, mandatory training on forced and child labour for all Neerlandia Co-op employees was implemented. This training educates employees on what forced and child labour is, its prevalence in the global economy, and the sectors the CRS operates in. Further, the training highlights the responsibility of the CRS in addressing forced and child labour and equips employees with information on what to do if they suspect forced or child labour is occurring in the supply chain. In addition, Neerlandia Co-op is exploring opportunities to implement role specific training to educate team members and help them identify and respond to risks of forced and child labour in supply chains. These opportunities will be evaluated through fiscal year 2025.

## **7. Efficacy of Actions**

Neerlandia Co-op conducted its annual review of current policies and procedures as they pertain to forced and child labour to ensure alignment with its ambitions to reduce these practices. In 2024, Neerlandia Co-op began tracking the efficacy of actions through relevant performance indicators, including completion rates for mandatory forced and child labour training. Relevant performance indicators will be tracked annually to measure year over year progress.

## 8. Approval and Attestation of the Report

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 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.



Full name: Steven Devries  
Title: General Manager  
Date: May 29, 2025

I have the authority to bind Neerlandia Co-op. The Statement has been reviewed and approved by the Board on behalf of itself.