

Neerlandia Co-op



Forced Labour in Canadian Supply Chains

Neerlandia Co-op

May 29, 2026



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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, 2025. In this Statement, the terms 'the Co-op', 'we', 'us', and 'our' refer to Neerlandia Co-op. The reporting entity covered by this statement is The Neerlandia Co-operative Association Limited, 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, 2026. Neerlandia Co-op will provide this report to its members alongside the financial statements for the current reporting year.

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, Relationships, 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-operative Limited (FCL). Neerlandia Co-op is in turn owned by 3,471 members in Alberta. As part of the CRS, Neerlandia Co-op helps build, feed and fuel individuals and our local communities. We employ 80 individuals.

Activities

Neerlandia Co-op's 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 and building and fuel.

Canadian Made

Neerlandia Co-op is committed to sourcing local products whenever possible for resale and at the time of this report sells many local product lines that were Canadian made.

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 wholesales and retailers primarily located in Canada, with a very small portions sourced from wholesales 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, and propane
Food	Grocery, Produce, Meat, Deli, Bakery and 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. All Neerlandia Co-op employees are required to attest they understand Neerlandia Co-op's commitment to addressing forced and child labour in the supply chain and commit to reporting any law or policy violations they may witness. 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 People and Culture 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 Province of Alberta 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.

3. Identification of Risks

Neerlandia Co-op's main supplier, FCL, accounts for 85% per cent 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:
 - 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 direct from producers and fair-trade-certified products to mitigate these risks.
2. Goods procured for home building centres:



- Key suppliers of FCL's home and building supplies manufacture goods in China. Using the same indices to assess supply chain risk, China has been identified as a [high inherent risk country](#) for forced and/or child labour. FCL has elected to avoid sourcing home and building supplies from certain regions of China, such as the [Uyghur Region](#) due to the elevated risk of forced and child labour. FCL has required key suppliers to sign a Social Responsibility Agreement. In 2025 in the FCL home and building supplies team traveled overseas for factory visits, where they conducted informal auditing and monitoring at five facilities. No incidents of forced or child labour were observed.

3. Goods procured for fertilizer:

- Within the agricultural business line, FCL sources 100 per cent of potash and sulphate products from Canadian producers, which are considered no risk of 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/or 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 sources 35% of phosphates from US domestic producers, while the remaining 65% is primarily sourced from OCP a known and reputable Moroccan producer.

FCL does not currently have a centralized supply chain auditing or monitoring program in place but 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% per cent of goods purchased by Neerlandia Co-op are procured from outside of FCL. Neerlandia Co-op has 10 main categories of goods for resale, which include, food, agriculture, energy, liquor, fuel, sporting goods, automotive repair shop and home and building supplies. 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 child labour. Neerlandia Co-op is exploring opportunities to implement a supplier code of conduct to minimise this impending risk.



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. This attestation includes human rights awareness training to create awareness regarding the risk of forced and child labour in the supply chain

Mandatory training on forced and child labour is required for all Neerlandia Co-op employees. 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 2026.



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 2025, Neerlandia Co-op continued 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 [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 "Steven Devries", written over a horizontal line.

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

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