



BRETT-YOUNG SEEDS LIMITED

Fighting Modern Slavery: Annual Report, May 31, 2024

Introduction

This document has been issued in accordance with *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ([Bill-S211](#)), “The Act”.

The Act requires companies to publish an annual report setting out the steps being taken to ensure that forced labour and child labour are not operating in their supply chains, and outline the company’s due diligence in place to avoid such situations within a company’s supply chain.

BrettYoung is fully committed to ethical working practices, and, as a company, regards forced labour and child labour (collectively, “modern slavery”) as unacceptable either within our own business or through our supply chains.

We recognise that modern slavery is a crime, and we strive to act ethically and with integrity in all our business dealings and relationships. We are working to implement and enforce effective systems and controls to ensure that modern slavery is not part of our operations at any level.



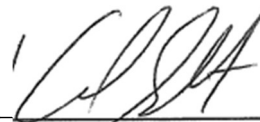
Our Vision

*Assurance that all workers in our own business
and in our global supply chains are protected,
respected and free from slavery, abuse, and
harm.*

This report, policy, and plan is approved on behalf of the company and the Board of Directors.



Erik Dyck, CEO



Calvin Sonntag, Executive Chair

Our Vision: Assurance that all workers in our own business and in our global supply chains are protected, respected and free from slavery, abuse, and harm.

Our Company

BrettYoung is a privately-owned agribusiness with headquarters in Winnipeg, MB, Canada. Proud of our 80+ year history in agriculture, we employ over 250 people in four processing and distribution facilities in Canada. In various sales territories across North America, we serve customers in three distinct markets:

- ✓ Agricultural Seed and Crop Inputs – we provide crop input solutions to Canadian and American farmers including canola, forages and corn, soybeans, and ag biologicals.
- ✓ Wholesale Forage and Turf – we partner with growers to produce forage and turf seed for domestic and export markets, serving 40 countries around the world.
- ✓ Professional Turf and Reclamation – we provide a wide range of products and services, including fertilizer, to the professional turf and reclamation industry in Western Canada and Ontario.

Our People

As an innovative agricultural business, we strive for the highest level of professionalism in everything we do. This is a basic prerequisite in offering our customers premium solutions that add value to their businesses. We realize the success of BrettYoung is really our customers' success.

Our employees share in the responsibility for the ongoing growth and success of the company by providing their personal best. BrettYoung is characterized by the dynamism of a committed privately held organization that challenges staff to take risks, view roadblocks as opportunities, and to explore innovative ideas. Encouraging staff to demonstrate initiative and then working together to realize goals is what sets BrettYoung apart.

Our Culture

We foster a professional and welcoming environment built on passion and energy.

We act with integrity, always.

Our Purpose

To engage our customers as suppliers and partners.

To provide innovative seed solutions and industry leading service,

To encourage your growth in every way.

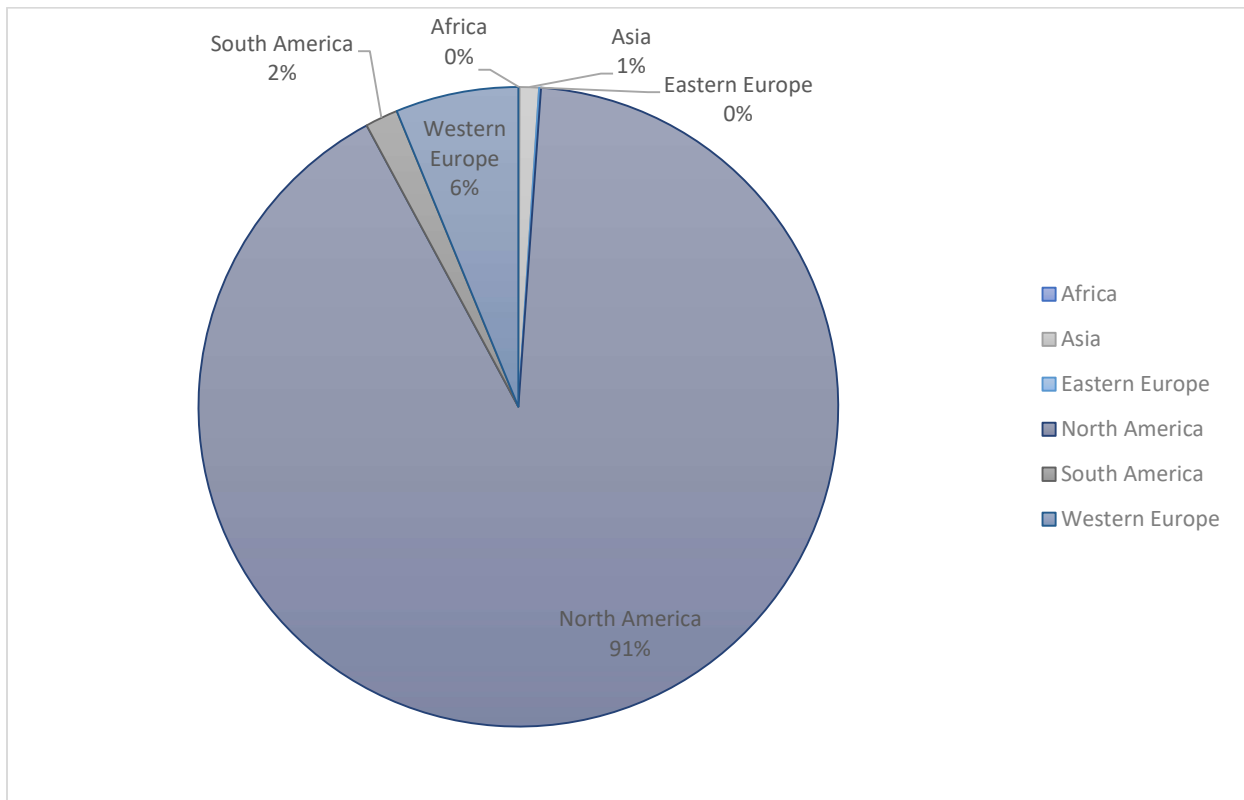
Our Structure

BrettYoung is locally owned and operated, has a centralized management model with Head Office in Winnipeg, Manitoba, Canada, and has plants in the Canadian provinces of Ontario, Manitoba, and Alberta. We have related operations in the USA (Brett Young USA, Inc.), which is a sales operation with no physical presence in the USA and managed from Winnipeg.

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Our Supply Chains

In 2023, the overwhelming countries of origin of our inputs for resale are from North America (Canada 75%, USA 16%) or Western Europe (Germany 5.5%, other countries 0.5%).



The supply chain structures within BrettYoung vary by product type.

Seed, by far the largest product we handle (contract, clean, & package) is mostly purchased directly from farmers in North America. The seed supply chain can be complicated when the seed is coated with fungicides or insecticides, with seed and coatings mostly sourced from North America or Western Europe and packaged in several types of bags with more distant supply chains, often in Asia.

We have begun the mapping of our supply chains and will continue to do so in the coming years.

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Risks in Our Supply Chain

2024 is our initial start of the work to map our supply chains. We engaged in direction-finding analysis based on tier 1 suppliers in our supply chain for seed only.

Country or Origin Analysis

We track country of origin as required by American Customs and Homeland Security purposes.

For this work we looked at information provided by Axios.com, see [Mapped: The countries where modern slavery is most prevalent \(axios.com\)](https://www.axios.com/2023/05/16/modern-slavery-map).

The analysis yielded the following results by country (in our 2023 supply chain):

Country of Origin	Est. enslaved people per 1,000	% of 2023 Purchases	Vendor Number
Czech Republic	7.7	0.10%	VDR-005041 VDR-003907
Egypt	4.3	0.06%	VDR-005041
Argentina	4.2	0.67%	VDR-006372
Italy	3.3	0.10%	
USA	3.3	15.62%	
Chile	3.2	0.99%	
France	2.1	0.04%	
Canada	1.8	75.38%	
New Zealand	1.6	0.97%	
Belgium	1.0	0.18%	
Denmark	0.6	0.09%	
Germany	0.6	5.46%	
Netherlands	0.6	0.01%	
Sweden	0.6	0.34%	

Product Analysis

Our seed inputs are tracked for country of origin, other inputs are not.

One of the main items that have been flagged by external parties (American and Canadian Customs) are called BOPP bags. BOPP stands for biaxially oriented polypropylene and are the (usually) white, mesh bags used mostly as temporary seed storage.

BOPP bags are sourced from a country of concern: Cambodia, with an estimated prevalence of enslaved people of 5 per 1,000, supplied by Polypro Solutions (VDR-004753). The supply chain for this input will be investigated over the next two years.

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Analysis

For our seed inputs, we looked at countries outside of North America and Europe.

We set the scope this way for two reasons: first, in North America the risk of modern slavery is lower, and second, those areas have enacted, or are in process of enacting, modern slavery legislation.

Our risk analysis showed that we had three vendors to investigate.

Country of Origin Risk Vendor	Product Identifier	Mitigation
Czech Republic Risk: 7.7 per 1,000 VDR-003907 VDR-005041	Crimson Clover 50 Lb Bag Lots: SEM2023254 SEM2023252 SEM2023253 SEM2023221 SEM2023220 SEM2023219 FF20230402 FF20230403 FF20230404	This vendor has bronze ESG status from Ecovadis
Egypt Risk: 4.3 per 1,000 VDR-005041	Berseem Clover 50 Lb Bag Lots: FF20220855 FF20220856 FF20220857	This vendor has bronze ESG status from Ecovadis
Argentina Risk: 4.2 per 1,000 VDR-006372	Signum Soybean Inoculant Launcher Liquid Soybean Inoculant Osmium Pea Lentil Inoculant	The vendor has an ethics statement recognizing their obligations.

Risk Assessment

External Supply Chain: We are not aware of any modern slavery in our supply chains, and our initial risk assessment suggests that the level of risk of modern slavery in our supply chains is low.

Internal Operations: No modern slavery has been identified in our internal operations. We will continue to develop and monitor the effectiveness of our existing internal processes and controls.

In the coming years BrettYoung is committed to:

- ✓ Continuing to map and evaluate our current supply chains.
- ✓ Train employees engaged in establishing and maintaining the supply chain and raise their awareness of the issue of modern slavery.
- ✓ Reviewing our current supplier approval and onboarding processes, including investigating the use of SEDEX as a provider of supply chain intelligence.
- ✓ Engage with industry partners to coordinate a collective approach to addressing this issue.

Policy

BrettYoung understands its responsibility to source inputs from companies that behave in accordance with the law.

Our policy encompasses both the statement below and the remediation processes that follow.

Policy Statement

We expect our suppliers, and their suppliers, to respect human rights. This includes supporting state-based judicial and non-judicial grievance and remediation procedures.

We will only become involved with grievances when all local and site-based grievance mechanisms have been exhausted by an individual or an organisation who represents them.

We will support our suppliers to put in place suitable mechanisms and staff to manage those mechanisms and any grievances raised.

Remediation

Forced Labour & Child Labour

measures taken to remediate forced labour and child labour.

Risk: Extremely low prices and/or unreasonably fast delivery times suggest corners are being cut which might signal improper labour practices.

Response: To encourage proper labour practices, BrettYoung will work to ensure that it receives high-quality inputs in reasonable timelines for a fair price paid to the supplier.

Risk: Vendors might be unaware of our obligations under Canadian law and our requirements that our vendors adhere to appropriate labour standards in their organization and their own supply chains.

Response: Over the next two years, BrettYoung will develop a reasonable code of behaviour it expects of its tier 1 suppliers which will include the requirement for due diligence to ensure that Tier 1 suppliers own supply chain adhere to acceptable standards of behaviour.

Risk: Our employees and vendor employees do not have a way to communicate their concerns about inappropriate labour practices.

Response: BrettYoung has an anonymous reporting tool that is available to all employees, suppliers, and customers on the web at <https://www.suggestionox.com/r/brettyoungseeds>.

Where forced labour or child labour is discovered in a supply chain:

- ✓ Because forced labour and child labour are crimes, we have no option but inform the federal authorities like the RCMP and suspend our relationship with the tier 1 supplier, otherwise we would become a party to the crime.
- ✓ We will inform our tier 1 supplier of the discovery and ask them to take action to solve the issue or remove the lower tier supplier within 90 days.
 - If no remedial action taken:
 - We will stop doing business with that supplier.
 - We will inform our trade association of the instance of forced labor or child labour in that supplier's supply chain.

Loss of Income as a Result of Remediation

measures taken to remediate the loss of income to the most vulnerable families that results from the measure taken to eliminate the use of forced labour and child labour.

We will investigate how we can remediate cases where we know that:

- ✓ Our having followed the law has caused a loss of income
- ✓ Where we know that no state or NGO resources have been made available to those people
- ✓ Within reason, when we have visibility down to the employee level of the offending supplier, and have a way of assessing “the most vulnerable families”

Training

training provided to employees on forced labour and child labour.

To engage our employees in this project and educate key procurement teams in the company, over the next two years we will:

- ✓ Create training for key staff engaged in sourcing decisions.
 - Example (general): <https://youtu.be/YRu6CaXTAxA?feature=shared>
- ✓ Create training for all procurement & sales teams on our trade policies.
- ✓ Prepare quarterly articles in the company e-newsletter “BrettYoung Underground” to highlight forced labour and child labour as a supply chain issue.

Measurement

how the entity assesses its effectiveness in ensuring that forced labour and child labour is not being used in its business and supply chains.

We will conduct a bi-annual risk assessment of countries of origin and review those risks against external data regarding the prevalence of forced labour and child labour in those countries, with further investigation by supplier as warranted.

We will identify key suppliers and mark them as safe suppliers where they have:

- ✓ Documented human rights policy or policies
- ✓ A Modern Slavery Statement or equivalent
- ✓ Certificates supporting their adherence to the legislated standard

We will track staff training on The Act:

- ✓ Using our video training platform (KnowB4)
- ✓ We will add the training to our new employee orientation

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