



Fruit d'Or 2025 Report
on Measures to Prevent and Mitigate the Risk of
Forced Labour or Child Labour in its Supply Chains

FruitdOr

For the fiscal year ending August 31, 2025
Version 01

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About This Report

This report has been prepared in accordance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) and outlines the measures taken by Fruit d’Or Inc. (“Fruit d’Or”) during the 2025 fiscal year to prevent and reduce the risk of forced labour or child labour within its operations and supply chains. The terms “forced labour” and “child labour,” as used in this report, have the meanings assigned to them under the Act.

This report covers the structure, operations, and supply chains of Fruit d’Or’s activities for the 2025 fiscal year, from September 1, 2024, to August 31, 2025. Unless otherwise indicated, the data presented in this report is current as of August 31, 2025.

2025 Achievements

During the 2025 fiscal year, Fruit d’Or sustained its efforts to prevent and mitigate the risks associated with forced labour and child labour, both within its direct operations and across its supply chains.

Key accomplishments for the year include:

- The use of the external platform, Alias, allowing employees to anonymously submit reports;
- The annual update of responsible sourcing commitments as part of its sustainability report;
- The continued rollout of its Supplier Code of Conduct, including a reporting mechanism;
- Full adoption of the code of conduct by all grower-partners, confirmed through signed acknowledgment;
- More than 50% of other suppliers adhered to the Code of Conduct, also confirmed through signature;
- The deployment of targeted training on forced labor and child labor for employees;
- The integration of forced labor-related parameters into the biannual assessment aimed at evaluating the sustainability practices of agricultural producers;
- The development of a comprehensive due diligence process based on OECD guidelines, with a view to progressive implementation in 2026;
- The continued collection of supplier practice data through the TraceGains collaborative platform, widely used in the agri-food industry;

The completion of informal audits of cranberry growers to verify on-the-ground compliance with human rights.

Structure, Activities, and Supply Chains

Founded in 1999 in the Centre-du-Québec region, Fruit d'Or is now the world's leading processor of organic cranberries and the second-largest processor of organic wild blueberries. The company employs nearly 500 people across five sites—four in Québec (Villeroy, Plessisville, Dolbeau-Mistassini, and Saint-Hyacinthe) and one in Carver, Massachusetts. Its products are distributed in over 50 countries, and Fruit d'Or collaborates with 90 grower-partners (cranberries and wild blueberries). The company operates in three business sectors: Ingredients, Nutraceuticals, and Retail.

Fruit d'Or's main suppliers are cranberry and wild blueberry growers, primarily located in Québec, with a few in New Brunswick and Massachusetts. Once harvested, the fruits are transported to be frozen and processed at one of Fruit d'Or's processing facilities.

Other key suppliers include providers of energy (hydroelectricity and natural gas), sweetening agents such as apple juice (sourced from China, Argentina, Spain, or Turkey), cane sugar (Brazil, Colombia, Paraguay), soluble corn dextrin fiber (China), sunflower oil (Netherlands, France, Romania, Ukraine), glycerin (Malaysia, India), and packaging (Canada, USA).

Policies et Due Diligence Processes

Fruit d'Or is firmly committed to respecting the fundamental rights and freedoms of individuals, as defined by the International Bill of Human Rights, which includes the Universal Declaration of Human Rights (UDHR), the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights. Fruit d'Or also adheres to the core principles and rights set out in the International Labour Organization (ILO) Declaration, the principles of the Ethical Trading Initiative (ETI) Base Code, and the 10 principles of the United Nations Global Compact (UNGC). See our Corporate Social Responsibility Statement:

https://fruitdor.ca/workspace/uploads/files/social_responsibility_statement_may_2025.pdf

As part of its support for the Sustainable Development Goals (SDGs), Fruit d'Or developed its first-ever sustainability plan in 2023, covering the 2024–2026 period. One of the plan's key priorities is ensuring a responsible supply chain. Three main commitments were established:

1. Require all suppliers (with annual transactions exceeding CAD 100,000) and grower-partners to adhere to its Supplier Code of Conduct
2. Engage 100% of suppliers identified as potentially having low ESG performance in a CSR evaluation program (detailed questionnaire or audit)
3. Systematically integrate sustainability criteria into the selection process for all suppliers

In 2024, Fruit d'Or launched its first Supplier Code of Conduct for Responsible Sourcing. This Code outlines expectations regarding human rights, environmental stewardship, business ethics, and integrity, and will eventually be applied across all subsidiaries under Fruit d'Or Inc. All current and future suppliers with whom the company transacts—or intends to transact—over CAD 100,000 annually and who appear on a targeted list are required to sign this document. The Code includes a contractual clause allowing Fruit d'Or Inc. to terminate business relationships in the event of a breach related to forced labor and/or child labor.

As of August 31, 2025, 100% of the company's cranberry grower-partners had signed the Code, along with more than 50% of others suppliers.

To consult Fruit d'Or's Supplier Code of Conduct:

https://fruitdor.ca/workspace/uploads/files/supplier_code_conduct_responsible_sourcing.pdf

In addition, to date, the company's raw material suppliers (excluding berry suppliers) have been invited to complete a questionnaire via the TraceGains platform, enabling Fruit d'Or to assess their compliance with:

- Local and federal laws regarding slavery and human trafficking
- The existence of a program ensuring health and safety for their workers
- The presence of a corporate social responsibility (CSR) program in their organization

Furthermore, during its last fiscal year, Fruit d'Or's agricultural supply chain was supported by a dedicated team consisting of a director and three full-time agronomists. This structure provides significant services to growers (notably agronomic support) and enables farm visits (each farm is visited at least once per year), thereby helping ensure compliance with ethical standards.

Agricultural producers are also invited to complete a biennial questionnaire to assess their sustainability practices, including a specific section on farm employees. The 2025 survey achieved a 51% response rate.

It should be noted that more than four out of five cranberry growers (86%) supplying Fruit d'Or hold either the *Cranberry Enviro-Certified* (CEC) certification or the *GlobalG.A.P.* certification, both of which include requirements related to workers' rights as well as their health and safety (representing 90% of Fruit d'Or cranberry supply (by weight) for 2025).

Risks Related to Forced Labor and Child Labor

Identification of Risks Within the Company's Own Operations:

Fruit d'Or Inc. uses the collaborative platform Sedex (Supplier Ethical Data Exchange), which enables transparent sharing of data related to social responsibility. In November 2023, Fruit d'Or underwent a SMETA audit (Sedex Members Ethical Trade Audit) for its two main operational sites located in the Centre-du-Québec region. The SMETA methodology, developed by Sedex, is designed to assess a company's compliance with the core principles of the Ethical Trading Initiative (ETI) as well as applicable local legislation. The four-pillar version of the audit was used, covering the following areas: labor standards, health and safety, environment, and business ethics. This audit also serves as a key tool to assess, through an independent third party, the risks of forced labor and child labor within the company's operations. A biennial audit cycle is planned to ensure rigorous monitoring and demonstrate progress over time.

Full SMETA audit reports are available here: <https://www.sedex.com/>

Fruit d'Or's reference number on Sedex is: ZC1043511

As part of its social responsibility and governance commitments, Fruit d’Or has been using since 2024 an external platform called Alias—a secure tool that allows employees to anonymously report any concerning situation or non-compliant behavior. This initiative is aimed at fostering a climate of transparency and trust, while reinforcing an organizational culture grounded in ethics, accountability, and respect for fundamental rights. Alias serves as an essential whistleblowing mechanism to help prevent, detect, and swiftly address any situation that may compromise the integrity of the company’s operations.

The company considers the risk of forced labor or child labor within its Canadian operations to be low. All employees are hired in full compliance with current laws and regulations, and Fruit d’Or ensures—through appropriate verification—that every individual has the legal right to work and chooses to do so voluntarily. Furthermore, all employees are free to join a union or any other form of representative association, in accordance with their fundamental rights.

Identification of Risks Within its Supply Chains:

In 2023, Fruit d’Or established an action plan to examine how its supply chains could potentially cause, contribute to, or be directly or indirectly linked to the risk of forced labor or child labor. This action plan supports the company’s previously mentioned commitments to building a responsible supply chain.

The first initiative of this action plan was the creation of the company’s Supplier Code of Conduct.

The second project included in the action plan was initiated in 2025 and consists of developing a formal due diligence process based on OECD guidelines. This process aims to complement and strengthen existing supplier approval and assessment mechanisms. As the overall framework for the process was developed in 2025, the next step will be to design the various tools required for its implementation, including a questionnaire to assess suppliers’ practices, a risk analysis tool related to forced labour and child labour that takes into account sourcing countries, product categories, and the suppliers involved, as well as a prioritization matrix for interventions. The gradual rollout of the process is planned for mid-2026 and will primarily target sourcing categories considered to be at higher risk. This first phase will notably cover all new suppliers of ingredients, packaging materials, and subcontracted services, as well as

current suppliers of sugar and apple juice concentrate. At this stage, targeted action plans will be developed for suppliers identified as high risk. These suppliers may also be subject to more in-depth assessments, including social audits such as SMETA audits.

In addition, annual visits to grower-partners will be documented, to ensure ongoing monitoring over time.

Finally, as part of its action plan, Fruit d'Or commits to developing and disseminating a Responsible Sourcing Policy, which will include strict supplier selection criteria related to social responsibility and sustainable development, including forced labor and/or child labor.

Correctives Measures

To date, no measures have been required to address instances of forced labor or child labor within Fruit d'Or's supply chains. The risk identification action plan detailed in the previous section will help determine whether any remediation or corrective measures are necessary in the future.

Corrective Measures Related to Income Loss

To date, no measures have been required to address income loss for vulnerable families resulting from actions taken to eliminate the use of forced labor or child labor within Fruit d'Or's operations or supply chains.

Training

During fiscal year 2025, training on forced labour and child labour was delivered to 11 employees from key functions, including procurement, agronomy, quality, human resources, and sustainable development. This training was provided by an external network specializing in responsible sourcing. In addition, it should be note that a governance committee has been established to oversee the implementation of the company's sustainability plan. This committee includes, among others, two employees responsible for supplier relations: an agronomist in charge of berries sourcing and the

corporate director of procurement. These committee members, along with the sustainability lead, benefited from awareness-raising on forced labor and child labor through workshops focused on social responsibility in supply chains.

Their approach is guided by frameworks such as the B Impact Assessment, the United Nations Sustainable Development Goals (SDGs), ISO 26000, BNQ 21000, and the Ethical Trading Initiative (ETI) Base Code / SMETA Standard, which help define the sustainability plan's priorities to ensure a responsible supply chain.

Effectiveness Assessment

At the end of each fiscal year, Fruit d'Or assesses the effectiveness of its initiatives to prevent forced labor and child labor using key performance indicators (KPIs). These indicators help measure progress and guide future actions. The main indicators tracked include:

- Proportion of cranberry growers-partners who have reviewed and signed the Supplier Code of Conduct;
- Proportion of priority suppliers who have reviewed and signed the Supplier Code of Conduct;
- Proportion of cranberry grower-partners holding a certification (CEC or GlobalG.A.P.) that includes requirements related to workers' rights as well as health and safety;
- Proportion of suppliers for whom a risk assessment—including risks related to forced labor and child labor—has been conducted;
- Proportion of high-risk suppliers identified;
- Proportion of high-risk suppliers for whom an action plan has been developed and implemented to meet Fruit d'Or's requirements.

These indicators are integrated into the company's sustainability plan, and progress is reported annually in the sustainability report, which is available at the following address:

https://fruitdor.ca/workspace/uploads/files/sustainability-progress-report-20250307_vf.pdf

Attestation

In accordance with the requirements of the Act, and in particular Section 11 thereof, I certify that I have reviewed the information contained in this report for the entity in relation to this report. To the best of my knowledge, and having exercised due diligence, I confirm that the information contained in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the above-mentioned reporting year.

I attest in my capacity as an administrator of Fruit d'Or Inc., for and on behalf of the Board of directors of Fruit d'Or Inc.

I have the authority to bind Fruit d'Or Inc.



Martin Le Moine

Chairman of the board of directors of Fruit d'Or Inc.

May 29, 2026