

**Report to confirm compliance with Bill S-211,
Fighting Against Forced Labour and Child
Labour in Supply Chains Act**

Friesens Corporation

May 15, 2024

Identifying information

Reporting entity's legal name	Friesens Corporation
Financial reporting year	January 1 – December 31, 2023
Identification of a revised report	<i>not applicable</i>
Business number	101527471
Identification of a joint report	<i>not applicable</i>
Identification of reporting obligations in other jurisdictions	<i>none</i>
Entity categorization according to the Act	Corporation
Sector/industry	Manufacturing
Location	Altona, Manitoba, Canada

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 this report. 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 Chad Friesen
Title CEO, Friesens Corporation
Date May 15, 2024

I have the authority to bind Friesens Corporation.

Signature 

Note:
This report received approval from the Board of Directors of Friesens Corporation in May 2024.

Note:

This report references activities undertaken during Friesens Corporation's previous financial year (January 1 – December 31, 2023).

1. The steps Friesens Corporation 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 Friesens Corporation or of goods imported into Canada by Friesens Corporation

- a. Friesens Corporation, its officers and managers, and its Human Resources staff consistently applied care and due diligence in complying with all labour laws and employment standards of the Province of Manitoba, including the *Employment Standards Code* which specifies minimum wage standards, protection for young workers, and the payment of wages.
- b. Friesens Corporation also applied due diligence and fully complied with the *Worker Recruitment and Protection Act* of Manitoba, which was enacted specifically to improve protections for foreign workers.
- c. In 2023, Friesens Corporation was audited by two (2) distinct and separate auditing firms who included in their review processes an audit of Friesens Corporation's adherence to provincial and/or Canadian labour laws and Corporation's practice of preventing and reducing the risk that forced labour or child labour:
 - Audit by Preferred by Nature (NEPCon Canada) in March 2023, which included demonstration of Friesens Corporation's compliance with the Forest Stewardship Council core labour requirements which specifically includes affirmations pertaining to forced labour and child labour.
 - Ethical Audit by QIMA in June 2023, which included an audit of Friesens Corporation's policies and practice in the areas of Health and Safety, Environmental Management, Child Labour and Young Workers, Working Hours, Wages & Benefits, and Labour Practices (including Forced Labour). Friesens Corporation was found to be fully compliant. Specific results from the Ethical Audit by QIMA conducted in June 2023 are shown below:

3.1. Child Labour			
Item No	Requirement	Result	Findings/Comment
3.1.1	Does the factory complies with the legal minimum age? Please note the age of the youngest worker found.	Pass	The factory complies with the legal minimum age. The youngest workers found is 22 years old.
3.1.2	Does the factory have effective procedures such as verifying suspected young worker documents to confirm the correct age of the worker at the time of recruitment?	Pass	The factory has an effective procedures such as verifying suspected young worker documents to confirm the correct age of the worker at the time of recruitment.
3.1.3	Does the factory keep copies or records of ID documents of all workers or similar way to check age?	Pass	The facility keeps copies and records of documents for all workers to check age at the time of recruitment.
3.1.4	Does the factory understand the requirements of laws and regulations on child labour? If so, is there a written child labor policy?	Pass	The factory understands the requirements of laws and regulations on child labor, internal policy includes provision on child labor.

3.2. Young Workers			
Item No	Requirement	Result	Findings/Comment
3.2.1	Are young workers exempted from hazardous work?	N/A	No young workers were detected during this audit.
3.2.2	Are young workers exempted from night shift?	N/A	No young workers were detected during this audit.
3.2.3	Are young workers exempted from overtime?	N/A	No young workers were detected during this audit.
3.2.4	Are young workers registered and given annual health checks?	N/A	No young workers were detected during this audit.
3.2.5	Does the factory understand the requirements of laws and regulations on young workers? If so, is there a written policy or procedure for young worker protection?	N/A	No young workers were detected during this audit.

Special Remarks	
Positive Remarks	The factory complies with the legal minimum age. The youngest workers found is 22 years old. The factory has an effective procedures such as verifying suspected young worker documents to confirm the correct age of the worker at the time of recruitment.
Negative Remarks	No negative issue on child labor and young worker was noted.

- d. Friesens Corporation holds correspondence, provided by our primary ink supplier, that indicates that they require their suppliers to certify that no raw materials supplied are produced by means of slavery or human trafficking.
- e. Friesens Corporation holds correspondence, provided by our primary printing plate supplier, that indicates that they require their suppliers to affirm that no raw materials supplied are produced by means of slavery or human trafficking.
- f. Friesens Corporation holds correspondence, provided by our supplier of digital printing equipment and related supplies, that indicates that they require their suppliers comply with international standard and regulations pertaining to forced labour or child labour.

3. Friesens Corporation's structure, activities and supply chains

- a. Friesens Corporation is a corporation registered in the Province of Manitoba.
- b. Friesens Corporation is an employee-owned, for-profit company. Profits are distributed to all active employees on a regular basis (at least once annually).
- c. The organizational structure consists of divisions and departments, with department managers reporting to divisional leaders, who report to corporate managers (vice-presidents) or the CEO. There is a standard chain-of-command structure.
- d. The organizational vision is to help others share their best story with the world, through printed books, school yearbooks, packaging products, and self-publishing services..
- e. The number of employees, including employees located in Canada and outside Canada, is approximately 500.

- f. Friesens Corporation manufacturers printed books in Canada and sells those books in Canada and outside Canada.
- g. Friesens Corporation manufactures books in two (2) facilities only, both of which are located in Altona, Manitoba.
- h. Friesens Corporation purchases raw materials from domestic and international companies, including paper, cover material, board, printing plates, ink, laminating film, glue, and corrugated cartons.
- i. Paper is the largest-volume raw material used in manufacturing books. We purchase paper that is produced by paper mills operating in Canada, the USA, and Italy.

- j. Friesens Corporation's supply chains include suppliers and manufacturers that are located in several countries. A very large majority of our raw material and equipment supplies are manufactured in Canada and the USA. We have fewer than 10 suppliers who manufacture in European countries (The Netherlands, Italy, Belgium, and Germany), and even fewer (less than 5) suppliers located in other countries (Israel, India, South Korea, and China).

4. Friesens Corporation's policies and due diligence processes in relation to forced labour and child labour


- a. Friesens Corporation has a published employee handbook ("The Friesens Way") that is made available to all employees. This handbook incorporates statements, policies and expectations for managers and employees encompassing the company's values and adherence to employment standards, including compliance and due diligence to ensure compliance with standards and regulations pertaining to forced labour or child labour. This handbook represents Friesens Corporation's documented policy and position and is our method of embedding responsible business conduct (RBC) into our operations and management systems. Representations of our statements, policies and expectations include:

We believe that every employee is entitled to work free of both harassment and violence. Friesens is committed to building and preserving a safe, productive, and healthy working environment for all employees based on mutual respect.

All employees must protect our company's legality. They are expected to comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with each other, Friesens property, our company's finances, products, partnerships, and public image.

Friesens has long believed in equal employment opportunity as outlined in the Manitoba Human Rights Code. Friesens recruits, hires, trains, and promotes without regard to gender, sexual orientation, age, ancestry, race or colour, national origin, ethnic origin, religion or creed, marital or family status, political belief, source of income, physical or mental disability.

- b. Friesens Corporation has a clear and documented Illegal Labour Policy:



Illegal Labour Policy

Introduction

This document was developed to address Friesens Corporation's policy regarding child labour, forced labour, human trafficking, and slavery.

Policy Details

Friesens Corporation is firmly committed to protecting individuals from the exploitations of illegal labour practices such as child labour, forced labour, slavery and human trafficking; such practices will not be tolerated by Friesens Corporation and are strictly prohibited.

Friesens Corporation will hold itself accountable to the highest ethical standards and will comply with and exceed all relevant and applicable local and international laws pertaining to illegal labour practices. In doing so, Friesens Corporation will not knowingly contract with, or carry on a business relationship with any organization or employer that does not adhere to the same standards or is in violation of any relevant or applicable labour laws.

Compliance

Friesens Corporation shall continually monitor its own employment practices as well as those of its partners, vendors, suppliers and all others conducting business on behalf of the organization in order to ensure compliance to ethical employment standards and protocols. In order to ensure compliance to the standards of this policy Friesens Corporation shall conduct periodical audits of its own employment practices as well as those companies the organization contracts with or maintains a business relationship with.

Where a supplier, vendor or contractor is found to be in violation of this policy Friesens Corporation shall take prompt remedial action in order to address the violation, remedial measures may include termination of the business contract with the organization.

- c. As of December 2023, Friesens Corporation did not have a structured program for identifying or assessing adverse impacts in operations, supply chains and business relationships (pertaining to forced labour and child labour).

5. The parts of Friesens Corporation's business and supply chains that carry a risk of forced labour or child labour being used and the steps Friesens Corporation has taken to assess and manage that risk

As of December 2023, Friesens Corporation had not yet done analysis that would determine if or in what way our activities and supply chains could potentially cause, contribute to, or be directly or indirectly linked to actual or potential risk that forced labour or child labour is used in our supply chains.

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

No measures were taken in 2023 by Friesens Corporation to remediate forced labour or child labour in our activities 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 its activities and supply chains

No measures were taken in 2023 by Friesens Corporation in this area.

8. The training the Friesens Corporation has provided to employees on forced labour and child labour

Friesens Corporation did not provide specific training to staff or managers in 2023 pertaining to forced labour or child labour.

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

No measures were taken in 2023 by Friesens Corporation to assess our effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains.