



McCain Foods | Canada

**Modern Slavery Report
Financial Year 2025**

Sustainability, human rights, and dignity in our supply chains



Foreword.

As a leading producer of prepared potato and appetizer products, and a family-owned company, McCain Foods Limited (“McCain”) is committed to addressing modern slavery¹ and respecting human rights in conducting its global business. A number of McCain policies and processes, including the McCain Code of Conduct and the McCain Supplier Code of Conduct, have been in place for years to help identify and manage these risks globally. Following the introduction of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) in Canada and similar legislation elsewhere, McCain continues to enhance its approach in ensuring respect for the human rights of its own workers and workers in its supply chain.

During its financial year ended June 30, 2025 (“FY25”, with other financial years being similarly referred to), McCain continued to advance its human rights approach and further develop its framework of guiding principles to ensure its business practices help address the risk of modern slavery within McCain’s own operations and its supply chain. In Canada, McCain’s Modern Slavery Committee continues to build on this foundation to effectively address local risks.

In addition to addressing the global policies and programs currently in place at McCain, this report outlines the status of initiatives in development at or otherwise affecting the Canadian business operations of McCain (“McCain Foods Canada”, “we”, “us” or “our”) and McCain’s affiliated entity, McCain Produce Inc.², to address the risks of modern slavery within their own operations and supply chains. Both McCain and McCain Produce Inc. are corporations existing under the laws of the Province of New Brunswick. McCain Foods Canada and McCain Produce Inc. are collectively referred to as the “Group” for the purposes of this report.

Structure, operations and supply chain.

McCain operates a global business. Its head office is located in Toronto, Canada. McCain is a privately-owned, multinational leader in the frozen food industry, manufacturing quality products, including French fries, appetizers, pizzas, vegetables, desserts, and prepared meals. McCain also owns companies in complementary industries, such as agriculture and transportation.

In Canada, McCain Foods Canada is the largest branded manufacturer of frozen potato products and supplies to quick service restaurants, food service businesses, and retail establishments (e.g., supermarkets). Beyond frozen potato products, McCain Foods Canada

¹ For the purposes of this report, the term “modern slavery” refers to forced labour and child labour as defined in the Act.

² The business activities of McCain Produce Inc. are not as broad as those of the reporting entity. Certain categorizations of McCain Produce Inc. differ from those of the reporting entity. The suppliers of McCain Produce Inc. would be particular to its own categorizations and sectors that apply to it and, as such, would differ from those of the reporting entity.

also supplies a range of prepared foods, appetizer products, and desserts. McCain Foods Canada sells products almost exclusively into the market in Canada and to certain affiliates of McCain outside of Canada. In FY25, McCain Foods Canada directly employed over 3,000 people in Canada and engaged thousands more indirectly through our logistics and supply chain.

Canada Procurement³



Diagram 1 - McCain Foods Canada procurement

In FY25, McCain Foods Canada’s largest category of spend was on agricultural products and, specifically, potatoes that are primarily procured from over 135 contracted farmers in Canada. Other raw materials, including ingredients (such as frying oils and batters) were sourced from over 45 suppliers primarily located in Canada and the USA.

Additionally, all finished goods that McCain Foods Canada does not manufacture itself are sourced from Canada or from McCain’s affiliate in the USA. Finally, McCain Foods Canada engaged more than 600 indirect suppliers, with the top 100 indirect suppliers representing 90% of indirect procurement spend.

These indirect suppliers are primarily located in Canada and the USA, and most notably include freight and warehousing service providers, equipment suppliers, and other operational and professional service providers. The following diagram provides an overview of McCain’s global operations and supply chain, including the operations and supply chain of McCain Foods Canada.

³ McCain differentiates procurement based on direct and indirect goods. Direct procurement involves the purchase of goods, materials, and services directly associated with the production of products (e.g., raw potatoes, oils, batters, spices, and packaging), whereas indirect procurement refers to the purchase of materials, services, and maintenance required to operate the business (e.g., manufacturing equipment, maintenance services, and consultancy services).

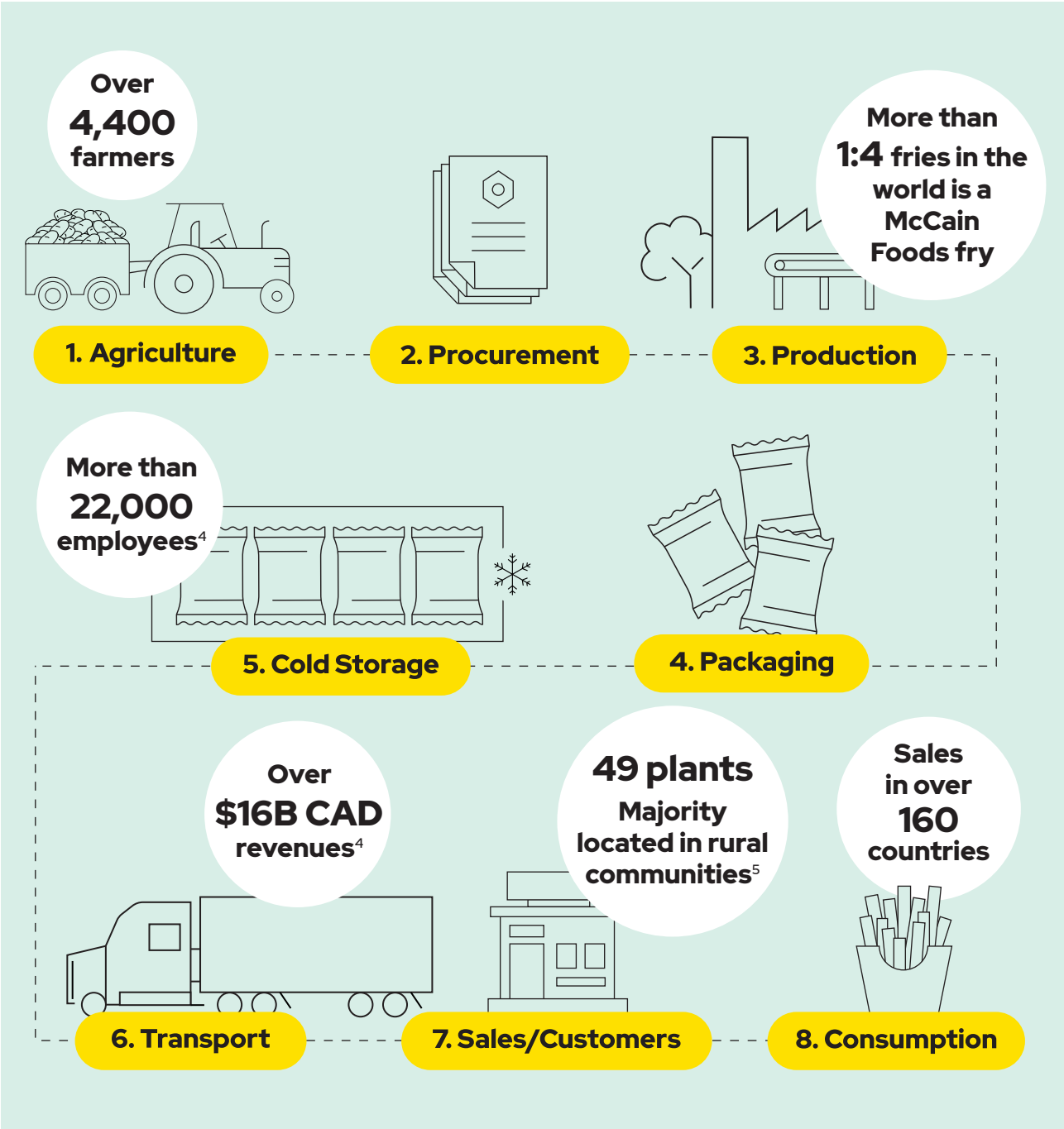


Diagram 2 - McCain's global supply chain

⁴ Revenue and employees include all of McCain's business units.

⁵ Plants information reflected as of June 2025.



Governance.

McCain believes that appropriate governance is essential to support its work to address modern slavery and respect human rights.

Board of Directors.

McCain's board of directors (the "Board") is currently composed of 10 members, including McCain's President & Chief Executive Officer, experienced independent and outside directors, and McCain family members. The experience and expertise of the Board includes specialist knowledge of sustainability in the agriculture and food industries.

Canada Modern Slavery Committee.

The Group has established a Modern Slavery Committee (the "Committee") composed of leaders from relevant internal functions, including, among others, Compliance, Legal, Human Resources, Procurement, Insurance & Loss Prevention, Supply Chain, Agriculture, and Sustainability. The Committee is accountable for the annual preparation of this report. Beyond the report, Committee members are committed to, as applicable to their specific function, carrying out the following:

- Monitoring reporting channels for any incidents of human rights violations and driving action to remediate any incidents if identified; and
- Continuously considering, and implementing or supporting the implementation of, methods to reduce risks of forced labour and child labour in the operations and supply chains of the Group.

Key areas of focus in FY25.

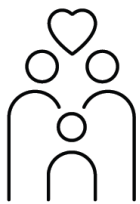
In FY25, McCain Foods Canada largely focused on continued planning and implementation to further enhance our foundational work addressing modern slavery and respecting human rights within our operations and our supply chain. Key initiatives for planning and implementation were identified based on input from stakeholders, including peers, customers, suppliers, and regulators.

McCain first engaged with a third-party risk assessment tool, Sedex, in FY24. Sedex is a global organization dedicated to promoting responsible and ethical supply chain practices and compliance with international standards. As a first line of diligence, Sedex members periodically provide self-assessment questionnaires ("SAQs"), which are self-declared responses to questions covering business practices, management systems, policies and workforce information. For members identified as higher risk or if otherwise requested (e.g. by a customer), companies undergo Sedex Members Ethical Trade Audits ("SMETAs"), which are completed onsite by approved third-party auditors evaluating four key areas against international standards, including labour standards, health and safety, environmental impact,

and business ethics. SMETA results are made available and reported in the Sedex platform and corrective actions, if needed, are monitored until they reach resolution. In FY24, McCain Foods Canada completed its first SAQs and SMETAs at several of its facilities. McCain also completed a pilot focused on 19 of its suppliers in Continental Europe. The pilot involved training McCain’s procurement leads on how to use the Sedex tool to increase oversight of McCain’s supply chain and better assess risk, whether specific to suppliers or inherent by commodity or by geographic location, as well as collecting information to inform McCain’s future process. Following the success of the pilot, in FY25 McCain used Sedex to assess human rights risks within its global supplier base with a view to planning its further rollout of the tool. McCain’s expanding use of Sedex represents progress to stronger oversight of McCain’s supply chain.

Risks of modern slavery practices in our operations and supply chain.

As a family-owned business, McCain operates according to its values: Family, Authentic, Trusted, and Quality.



Be part of our family



Be a trusted partner



Be your authentic self



Be committed to quality

McCain understands that there is an inherent risk of exposure to the threat of modern slavery in food and agricultural supply chains. The diversity and scale of McCain’s supply network means that these threats are relevant to McCain’s business around the world, and that McCain has an important responsibility to focus on respecting human rights and addressing risks of modern slavery in the industry.

For FY25, we identified that the majority of the Group’s supply chain includes direct and indirect suppliers primarily operating in Canada and the USA, countries which are considered to have overall lower risk scores based on the Global Slavery Index⁶. However, we acknowledge that the agricultural sector in particular poses a higher risk

Diagram 3 - McCain values

of modern slavery, including within Canada and the USA, requiring us to be vigilant in assessing and addressing risks.

⁶ <https://www.walkfree.org/global-slavery-index>

Actions we take to assess and address risks.

1. McCain policies.

Globally, McCain believes that strong internal policies and systems are an important aspect of helping to manage and mitigate the risk of modern slavery in its operations and its supply chain.

McCain has historically had a set of policies that are regularly reviewed to, among other things, help mitigate against human rights violations. These include [McCain's Code of Conduct](#) and [Supplier Code of Conduct](#).

McCain's Code of Conduct sets out the company's expectations of its employees with regards to interactions with and treatment of all its stakeholders. The policy specifically addresses several elements that help reduce risks of forced labour and child labour within the Group's operations, including provisions directly addressing human rights and modern slavery, a respectful workplace, and non-retaliation. The Code of Conduct also provides details on McCain's complaints mechanism, which allows employees to raise concerns or complaints related to forced labour or child labour. The Code of Conduct was reviewed in FY23 and updated in FY24. Additional updates will be made on an as needed basis to ensure the Code of Conduct continues to effectively address modern slavery issues.

The same level of diligence in regard to respecting human rights is expected from McCain's suppliers. McCain's Supplier Code of Conduct governs the actions of its suppliers, drawing upon international standards (International Labour Organization and United Nations Guiding Principles on Business and Human Rights) and best practices in human rights and sustainability. The Supplier Code of Conduct is founded upon McCain's values and applicable laws around the world and sets stringent standards of ethical conduct for the Group's suppliers, including clear prohibitions against forced labour and child labour. McCain may require that suppliers demonstrate compliance with the Supplier Code of Conduct.

Most recently, in FY25, McCain adopted a [Global Human Rights Policy](#) which details its overall global commitment to respecting human rights and outlines the minimum standards McCain expects within its own operations and its supply chain. The policy also includes new governance mechanisms which will be used to further embed respect for human rights into McCain's operations, including those of the Group.

Together, these policies and other programs – such as McCain's global sustainability strategy and commitments – aim to help employees and suppliers understand their responsibilities related to managing social, ethical, and environmental issues in a responsible manner consistent with McCain's values. All employees and suppliers are made aware of the expectation that they will familiarize themselves with, and comply with, applicable policies.

The Code of Conduct, Supplier Code of Conduct, and Global Human Rights Policy are overseen by a cross-functional group of McCain senior executives. The policies are

periodically reviewed and updated as necessary to help ensure that they are adequately addressing modern slavery issues.

2. Risk mapping and due diligence.

McCain Foods Canada carries out a number of actions to assess and address the risks of modern slavery throughout our operations and our supply chain. McCain Foods Canada continues to evaluate and improve our processes by incorporating tailored practices designed to identify and mitigate risks of modern slavery in our own operations and our supply chain, including expanding the use of the Sedex third-party risk assessment tool. The Group remains committed to implementing such tailored practices based on gaps identified to date, including by:

- Continuing assessment and updating of documentation to ensure modern slavery risk mitigation components are incorporated, as appropriate, and gaps are addressed;
- Maintaining attention on its direct supply chain to identify and address any high-risk categories; and
- Augmenting training of its workforce and encouragement of reporting risks and incidents.

3. Employee awareness and training.

McCain Foods Canada actively supports awareness and engagement regarding modern slavery by making resources available to our employees and through providing formal training. Globally, McCain produces a sustainability report each year, serving as one forum available for employees to learn about its approach and progress relating to respecting human rights and addressing key risks. In FY26, McCain released its [FY25 sustainability report](#), a summary report that builds on our FY24 report, which reiterates McCain's expectation that the highest ethical standards are upheld throughout its operations and its supply chain, and further describes its actions and initiatives to support this expectation, including its zero-tolerance approach for corruption or human rights abuses. The FY25 report builds on this expectation by providing details on how McCain has strengthened its human rights approach, including through the adoption of the Global Human Rights Policy.

McCain Foods Canada also provides specific supplemental training on the Supplier Code of Conduct to employees and suppliers engaged in significant capital projects as needed, including information about identifying, mitigating, and reporting modern slavery.

4. Compliance with employment and labour laws.

McCain Foods Canada engages in best practices in our recruiting and hiring activities to ensure that all employees are appropriately engaged and on-boarded in accordance with applicable laws, including minimum wage requirements, age-related employment laws to help prevent the use of child labour, and laws ensuring adequate and fair pay for workers' time.

In FY25, McCain Foods Canada undertook a pay equity and transparency and living wage analysis to help ensure our workers receive adequate and fair pay. Additionally, McCain Foods Canada consistently takes significant actions to ensure the health and safety of employees and applicable third parties.

5. Working with organizations.

McCain Foods Canada has continued a dialogue with a number of key suppliers and customers regarding the manner in which parties can collectively address and reduce the risk of modern slavery. Moreover, with respect to modern slavery risks in the food and agriculture industry specifically, McCain Foods Canada continues to explore the possibility of working with other organizations/NGOs to obtain access to authoritative materials, information and guidance on best practices.

6. Managing supplier contracts.

McCain Foods Canada maintains standard procurement terms and conditions for transactional matters and negotiated service agreements for ongoing supply relationships which outline expectations to help manage modern slavery risks. If a supplier is found to be in breach of the terms stipulated in their contract, including those relating to compliance with the McCain Supplier Code of Conduct, we can take corrective action and suspend or terminate the contract with that supplier.

Additionally, McCain Foods Canada has built strong relationships with our potato farmers – our largest source of raw material. McCain Foods Canada has regular contact with potato farmers, providing close visibility to their operations. The strength of McCain Foods Canada's relationships with our potato farmers also positions us well to implement contractual terms and audit rights that specifically address concerns of forced labour or child labour in our farmers' respective operations and supply chains.

We take any breach of McCain's Supplier Code of Conduct – or any other breach involving a risk to human rights – seriously. If a breach is identified we address it promptly, with the ultimate goal of reducing or removing the risk altogether (e.g., potentially removing a supplier from our supply chain).

7. Reporting concerns.

Pursuant to McCain's Code of Conduct, Supplier Code of Conduct and Global Human Rights Policy, the Group's employees and suppliers are encouraged to report any identified or suspected occurrences of modern slavery or human rights violations. Employees may make a report to their manager or to any member of the Human Resources or Global Legal and Compliance teams. For employees or third-party stakeholders who wish to make an anonymous complaint to an external service, McCain retains an independent external service

provider which is authorized to receive whistleblowing reports in relation to its global business (contact details are available in the Code of Conduct and Supplier Code of Conduct). Anonymous complaints can be made through email, online, or a third-party call centre, and all reports received by the external service provider are reported to McCain's Global Legal and Compliance team and are investigated as required.

As at the date of this report, no reports or complaints have been received in respect of actual or suspected modern slavery occurrences in Canada or otherwise in respect of the Group's operations or supply chain.

Further actions we will take to assess and address risks.

To strengthen our position in addressing risks of modern slavery and respecting human rights, McCain Foods Canada is committed to continuous assessment of our operations and our supply chain to identify new or developing areas of risk in our business and implement key initiatives to mitigate existing and new risks.

1. Policy development.

In FY25, McCain began working on the development of several employment-related initiatives to ensure its employment policies are aligned with legal requirements and appropriately address modern slavery risks. This work includes the development of a Prevention of Underage Labor & Protection of Young Workers Policy for North America, applicable to the Group. In addition, development of guidance and initiatives was started to verify foreign workers in Canada have appropriate work permits such that they are able to receive required protections under Canadian law. This work is continuing in FY26.

2. Further understanding and assessment of human rights risks across McCain's own operations and its supply chain.

To support the continued development of a robust human rights approach that further improves McCain's ability to identify risks and is aligned with international frameworks and evolving regulatory requirements, McCain plans to carry out a human rights impact assessment ("HRIA") with the support of an expert consultant. This will enable McCain to enhance its understanding of human rights risks and better prioritize key initiatives to manage potential risks within its own operations and its supply chain. The HRIA is planned to be carried out globally and will include McCain Foods Canada.

With respect to McCain's supply chain, as previously noted, following the success of the Sedex pilot in Continental Europe in FY24, McCain leveraged Sedex to assess the inherent human rights risk of its broad global supplier base in FY25 to help guide further rollout of its approach with Sedex. Using country of origin and commodity as indicators, 250 medium- and

high-risk suppliers were identified globally. Going forward, for suppliers identified as medium- and high-risk, McCain plans to assess SAQs and SMETA results to identify supplier risks and monitor corrective actions. McCain also plans to prioritize onboarding top-spend, high-risk suppliers onto Sedex.

With respect to McCain Foods Canada's own operations, our facilities are registered as members of Sedex and continue to periodically complete SAQs. As required, our facilities will also periodically carry out SMETAs. In FY25, 4 of 6 manufacturing sites in Canada required SMETAs and were completed. These activities will continue to enable McCain Foods Canada to identify opportunities for improvement to help address the risk of modern slavery within our own operations.

How we assess the effectiveness of actions we take to address modern slavery risks.

One key mechanism for assessing the effectiveness of McCain Foods Canada's modern slavery risks is through stakeholder engagement. Engaging with stakeholders helps McCain Foods Canada to assess the risk of modern slavery in our own operations and our supply chain, and understand the mechanisms being implemented or used to help mitigate the risk. McCain Foods Canada currently engages with our stakeholders on an informal, but ongoing, basis through a variety of channels tailored to the needs of each group. These channels include, among others, one-on-one meetings with potato farmers and other suppliers, as well as monitoring incidents reported through McCain's complaints mechanisms.

As McCain continues to improve its approach for managing human rights risks in its own operations and its supply chain, as outlined in the 'Further actions we will take to assess and address risks' section above, tracking and assessment of additional key performance indicators may be considered.

This joint report of McCain Foods Limited and its affiliate, McCain Produce Inc., was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the board of directors of McCain Foods Limited.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge and having exercised reasonable diligence, I attest that the information in this report is true, accurate, and complete in all material respects, for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as a director of the board of directors of McCain Foods Limited for and on behalf of the board of McCain Foods Limited. I have the authority to bind McCain Foods Limited.



Max Koeune

President, Chief Executive Officer and
Director, McCain Foods Limited
Date: May 31st, 2026