



2025 Report on Forced Labour and Child Labour

This report is made pursuant to the reporting obligations laid out in the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)(the "Act"). Avena Foods Limited ("Avena") is committed to identifying, addressing and preventing forced labour and child labour in our supply chains and activities. This report details the steps Avena has taken during the period from January 1, 2025, to December 31, 2025, to address forced labour and child labour in our operations and supply chain.

About Us

Located in the Canadian Prairies, Avena is a specialty miller that provides food, beverage, pet food and nutraceutical manufacturers with sustainably grown and milled purity protocol oat and functional gluten-free pulse ingredients.

Avena has built its business based on four core values and encourages employee commitment through the following values:

- Do the right thing when no one is looking.
- Dive in, speak up and leave a mark.
- Welcome challenges with a smile.
- Collaborate to do great things with customers, farmers, and colleagues.

Avena is committed to a positive work environment for all employees, compliance with applicable laws, integrity, ethical behaviour and good corporate citizenship. This commitment extends across our entire supply chain. We have built strong partnerships with farmers and manufacturers to ensure that we provide consumers with sustainably grown, specialty milled, high-quality, safe, and nutritious pulse and oat ingredients.

Our People

Avena employs over 100 employees from a multitude of backgrounds and cultures. Our people are integral in the success of Avena.

Our Supply Chain and Activities

Our operations are based in Canada, and the company has operated in the Canadian market for many years, and the bulk of our suppliers are also Canadian based. Our supply chain consists of raw material providers, packaging materials, transportation, utilities, and other goods and services.

Governance

Avena is committed to achieving the objectives and requirements of the Act. We have established a committee comprised of representatives from finance, human resources and customer service. This committee is responsible for ensuring that a framework is in place for analysis and decisions concerning the risk of forced labour and child labour.



Additionally, the Avena leadership team is committed to complying with all applicable laws as well as promoting integrity and ethical conduct. The leadership team plays an important role in ensuring that forced labour and child labour does not exist within our supply chain.

Our Policies and Procedures

Avena is committed to achieving the objectives and requirements of the Act. Through our policies and procedures, we aim to ensure that there is no modern slavery, forced labour or child labour in our operations or supply chain.

Avena follows the ETI Base Code. This is a globally recognized code of labour practice which serves as a foundation for promoting ethical practices. This further strengthens Avena's commitment to ethical sourcing and human rights.

Avena is a Supplier Ethical Data Exchange ("SEDEX") member and routinely undergoes Sedex Members Ethical Trade ("SMETA") audits. This audit assesses compliance with labour standards, health and safety, environmental and business ethics.

Action Taken to Prevent and Reduce the Risks of Forced Labour or Child Labour

In 2025, Avena took several steps to prevent and reduce the risks of forced labour and child labour in our operations and within our supply chain.

Supplier Code of Conduct

In 2025, the Supplier Code of Conduct continued to be shared with other Avena stakeholders, supporting alignment with Avena's commitment to ethical labour practices and responsible supply chain management.

The Supplier Code of Conduct outlines Avena's expectations and requirements, including those related to labour and human rights, for vendors, suppliers, service providers, and consultants ("Vendors").

More specifically, the following principles are expected to be upheld by our vendors:

- Freely chosen employment: Vendors must not use any form of forced or involuntary labour, slavery or human trafficking. All work must be voluntary, and employees must be free to leave or terminate employment at any time.
- Vendors must comply with all applicable local laws regarding the minimum age of employment.
- Vendors must pay employees according to applicable wage laws, including minimum wage, pay equity, overtime and benefits.
- Vendors must prohibit discrimination based on the requirements set out in the Canadian Human Rights Act.

These measures strengthened supply chain accountability, reinforced ethical labour practices, and ensured Avena continues to mitigate risks related to forced and child labour.



Hiring Under Age of 18

The Hiring Under Age of 18 Policy was reviewed and updated in 2025 to ensure full compliance with labour standards and to provide safe working conditions for young employees. The policy reinforces appropriate protections, outlines supervision requirements, and aligns with applicable regulations to prevent any risk of exploitation.

Whistleblower Policy Review and Reinforcement

Avena maintains a transparent and ethical workplace through its Whistleblower Policy, which was updated in 2024 and further reviewed in 2025 to reinforce best practices.

The policy ensures that employees are aware of their responsibility to report unlawful, dishonest, or unethical behaviour, including breaches of Avena's Code of Conduct. It outlines the reporting procedure, guarantees confidentiality for those who come forward, and provides assurances that whistleblowers are protected from any form of retaliation. This ongoing review demonstrates Avena's commitment to ethical operations and a safe reporting environment.

Sedex Audit

In 2025, Avena underwent a third-party Sedex audit to validate adherence to ethical labour practices, supply chain standards, and compliance with responsible sourcing expectations. This reinforces Avena's ongoing commitment to mitigating the risks of forced and child labour.

Diversity, Equity, and Inclusion (DEI) Policy

Avena continues to uphold DEI policies to ensure a workplace where every individual is valued, respected, and free from exploitation. Policies were reviewed in 2025 to reinforce fair hiring practices and equitable treatment of all employees.

Hiring Process Controls

As part of ongoing due diligence, Avena has strengthened hiring controls to ensure all employees are recruited voluntarily and that forced labour does not occur. In 2025, the process was enhanced to include verification of government-issued identification for all new hires, further confirming compliance with labour standards.

Avena is committed to continuously reviewing and refining its internal practices to eliminate any risk of forced or child labour across operations.

Due Diligence Process in Relation to Forced Labour and Child Labour

Avena has assessed the risk in our operations and within our supply chain as low due to the location of our suppliers and the nature of the goods and services they supply. We will continue to assess the entire supply chain and manage the potential risks within it.

Training

Avena employees are required to read and understand the Employee Handbook and Code of Conduct. Employees are provided with training on policies and procedures during their onboarding. Additionally, all employees are required to participate in annual refresher training. Avena employees are aware of company policies and procedures and must report any risks that



they may encounter when dealing with suppliers. We continue to look for ways to assess the entire supply chain and managing the risks within it

Remediation Measures

Avena is committed to preventing forced labour and child labour in our supply chains.

Avena has not identified any incidents of forced labour or child labour in our activities or supply chains in 2025. As such, no specific remediation measures have been required.

Remediation of Loss of Income

Avena has not identified any loss of income to vulnerable families resulting from steps taken to prevent the use of forced labour or child labour in its activities and supply chains. As such, no remediation measures have been required.

Assessing Effectiveness

Avena is committed to continuously improving our operations and ensuring the effectiveness of policies and procedures. We regularly review our policies and procedures to identify any gaps and ensure they remain current and aligned with best practices. Updates are made as needed to support ongoing improvement in our operations.

Approval & Signature/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 this Report is true, accurate and complete in all respects for the purposes of the Act, for the reporting year listed above.

This report has been reviewed and approved by the Chief Executive Office of Avena Foods Limited.

A handwritten signature in blue ink, appearing to read "Wayne Arsenault", is written over a horizontal line.

Wayne Arsenault
CEO

Date: *MARCH 11, 2026*