

BroadGrain Commodities Inc. Bill S-211 Report

Financial Report Year: 2023

Business Number: 833642069RC0002

1. BroadGrain's Structure, Activities and Supply Chain

BroadGrain Commodities Inc. (hereinafter referred to as, "BroadGrain") is a leading Canadian-based global marketer and originator of grains, cereals, oilseeds, pulses, specialty crops and related by-products for both consumer food, and feed markets.

BroadGrain and its subsidiaries are engaged in shipping, originating, handling, processing, storing and marketing services for the above products. Areas in which product is sourced from is particularly from Canada, South America, and Africa.

BroadGrain and its subsidiaries employs more than 160 people worldwide and operates in almost every continent of the world. Facilities and trading offices are located in Canada, China, United Arab Emirates, Argentina, Algeria and Nigeria.

2. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

BroadGrain and its subsidiaries have created and implemented a Supplier Code of Conduct to prevent use of forced and child labour. This includes provisions on:

- Providing safe and healthy working conditions at all operations
- Never use or tolerate the use of forced labor or child labor
- Meeting or exceeding all legal requirements for compensation and working conditions
- Meeting the legislated age requirements for workers in their respective jurisdictions.

In addition, ongoing review of suppliers is done through our regular supplier set up processes. When employees are on-boarded, we verify their age to ensure we comply with minimum age laws.

3. Parts of the Business and Supply Chain that Carry a Risk of Forced or Child Labour and the Steps Taken to Assess and Manage that Risk

According to the International Labour Organization, Walk Free, and the United Nations International Organization for Migration, per 1000 people, Africa and Arab States are at an increased risk of forced labour. Therefore, BroadGrain is committed to taking additional steps to ensure that additional due diligence is taken for our operations in the United Arab Emirates, Algeria, and Nigeria with regard to the prevention of forced and child labour.

4. Measures Taken to Remediate any Forced or Child Labour

BroadGrain has not yet found any source of forced or child labour in its supply chain. That said, if it is established that an organisation doing business with BroadGrain is involved in forced or child labour then BroadGrain will review the continuation of business with such organisations and retains the right to cease business with them. BroadGrain is committed to acting with integrity and professionalism in all its business dealings and relationships whether in Canada or any other country.

5. 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

Given that BroadGrain has not experienced the use of forced labour or child labour in its supply chains, there has not been any need to remediate the loss of income. That said, if this situation were ever to occur, BroadGrain will evaluate needs on a case-by-case basis to determine how to best remediate the losses to the persons affected.

6. Training Provided to Employees on Forced Labour and Child Labour and

BroadGrain is continuing to implement training on forced and child labour with our sales teams and management. We created a customized BroadGrain training module on forced and child labour for all employees and how issues regarding forced or child labour can be noticed and addressed.

7. Assessing Effectiveness in Ensuring Forced or Child Labour is Not Being Used in our Business or Supply Chains

BroadGrain ensures that hires are above minimum age limits to avoid the use of child labour. BroadGrain has also integrated a Supplier Code of Conduct in our operations when contracting with suppliers. We are also performing periodic audits regarding our supply chain on the documentation we have on employees and suppliers. Entities that sell our product are required to acknowledge that they have read and agree to abide by the Supplier Code of Conduct (accessible at <http://www.broadgrain.com/legal>) and understand that it replaces all previous supplier codes.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. 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.

Zaid Qadoumi

Director

Date: May 2, 2024



I have authority to bind Broadgrain Commodities Inc.