

# 2025 Modern Slavery Report

By Snobelen Farms Ltd.

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## 1. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") requires businesses to state the actions taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This report constitutes the second report prepared by **Snobelen Farms Ltd. (SFL)** and is produced for the financial year ending **June 30th, 2024** (the "Reporting Period").

Snobelen Farms Ltd. is committed to preventing and reducing the risk of forced and child labour within its network of growers, suppliers, business partners, and extended supply chain worldwide. We expect all partners, contractors, and subcontractors to uphold these principles and adhere to applicable human rights and employment standards laws.

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## 2. Steps Taken to Prevent and Reduce the Risk of Forced Labour or Child Labour

Respecting human rights is a fundamental corporate responsibility and a core value governing all our activities. We place the highest importance on conducting business with integrity and expect the same from our partners.

During the Reporting Period, we took the following steps to prevent and reduce the risk of forced or child labour in our business and supply chains:

- Created a **Supplier Code of Conduct**.
- Hosted a **third-party ethical trade audit** on our company.
- Began establishing a **third-party due diligence process** including requesting a Code of Ethics from our suppliers.
- Undertook a **Farm Sustainability Audit (FSA)** through the **SAI Platform**.

Further details of these actions are outlined in this report.

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## 3. Structure, Activities, and Supply Chains

Founded in 1971, Snobelen Farms Ltd. is a **privately owned** corporation headquartered in **Lucknow, Ontario**. Specializing in the **receiving, production, processing, storage, and sales**



of food-grade soybeans, commercial grains, and pedigreed seed, the company operates across **Canada and internationally**. With **seven elevator locations** and approximately **70 full-time employees**, Snobelen Farms takes pride in its commitment to **diversity and inclusivity** within its workforce.

The company's **three main business streams** include:

- **Grain elevators** for receiving, drying, storage, and sales in **eastern Canada**
- **Soybean export to Asia and Europe**.
- **Certified Seed production and processing** for farmers.

By implementing **innovative agricultural practices**, Snobelen Farms has become a leader in the grain, seed, and export industries.

Our **Senior Leadership Team** oversees governance practices to ensure compliance with **high corporate governance standards**. These governance practices establish **frameworks, processes, and principles** that promote **ethical, responsible, and effective** operations, with a strong focus on **accountability, transparency, and stakeholder engagement**.

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#### **4. Company Policies and Due Diligence Processes**

Snobelen Farms Ltd. is committed to **embedding human rights considerations** into its policies, governance, and decision-making. Managing **Environmental, Social, and Governance (ESG) risks and opportunities** is integral to our business success.

As a **SEDEX Member (Supplier Ethical Data Exchange)**, Snobelen Farms undergoes **third-party ethical audits** via the **SMETA (SEDEX Members Ethical Trade Audit) process**. This platform allows suppliers to share **ethical and responsible business practice data** with customers.

Our policies and practices are informed by **industry-leading standards**:

- **Canada Labour Code**
- **Local human rights laws**
- **The United Nations' Guiding Principles on Business and Human Rights (UNGPs)**

Snobelen Farms Ltd. Is committed to identifying and addressing modern slavery risks. We are **developing a strong framework** to prevent forced labour, child labour, human trafficking, and human rights violations in our operations.

We expect our team members, clients, suppliers, and other third parties with whom we have a business relationship to share our commitment to respect human rights.

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## 5. Identifying and Addressing Modern Slavery Risks

Snobelen Farms Ltd. employs a **risk-based approach** to assess and manage the risks of forced labour and child labour. We recognize that our **supply chain and industry** present potential risks, and we proactively adjust our actions accordingly.

Our **due diligence process** includes:

- Identifying **SEDEX Member suppliers** with **SMETA audit reports**.
  - **Supplier Questionnaires**, including requests for **Codes of Ethics** and information-sharing expectations.
  - Managing **Farm Sustainability Audits (FSA)** through the **SAI Platform**, demonstrating our commitment to **sustainable food production with social responsibility**.
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## 6. Remediation of Forced or Child Labour

Our **Supplier Questionnaire** outlines our **Code of Ethics**, setting compliance expectations for all business partners.

If a **compliance issue** is identified, including **child labour, forced labour, or serious health and safety risks**, Snobelen Farms will:

1. **Suspend relationships** with the facility and/or supplier.
  2. Work with suppliers to **implement remediation** if possible.
  3. **Terminate relationships** with suppliers unwilling to remediate.
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## 7. Remediation of Income Loss for Vulnerable Families that results from any measures taken to eliminate the use of forced labour or child labour in its activities and supply chains

To date, no instances of income loss have been identified as a result of our measures to eliminate forced labour or child labour in our activities or supply chains.

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## 8. Employee Training on Forced Labour and Child Labour

All Snobelen Farms Ltd. employees receive an **Employee Manual** that includes:

- **Standards of Conduct**
- **Employee Code of Ethics**

- **Ethical training topics**
- **Anonymous reporting app** for concerns

Additionally, we have developed **company-wide training** focused on:

- Identification and reporting of **forced labour, child labour, and modern slavery**.
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## 9. Assessing Effectiveness

We are actively developing plans to **assess the effectiveness** of our measures to prevent and reduce **forced labour and child labour**. These assessments will ensure ongoing improvements in our practices.

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## 10. Approval and 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 for the entity 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 have the authority to bind Snobelen Farms Ltd.**



Samuel S. Snobelen  
President  
Director of Snobelen Farms Ltd.  
March 21, 2025