

# 2026 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 certain entities to report annually on the steps taken to prevent and reduce the risk of forced labour and child labour in their operations and supply chains.

This report constitutes the **third Modern Slavery Report** prepared by **Snobelen Farms Ltd. (SFL)** and covers the financial year ending **June 30, 2025** (the “Reporting Period”).

Snobelen Farms Ltd. is committed to conducting business in a manner that respects human rights and upholds ethical labour practices. We recognize our responsibility to prevent and reduce the risk of forced labour and child labour within our operations and throughout our supply chain, including among growers, suppliers, contractors, and business partners.

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

Respect for human rights is a core value guiding all Snobelen Farms activities. During the Reporting Period, we **maintained and strengthened** our existing controls and continued to identify opportunities for improvement.

Key actions during the Reporting Period included:

- Ongoing implementation of our **Supplier Code of Conduct**
- Continued participation in **third-party ethical trade audits under the SMETA protocol**
- Review and follow-up of **identified areas for improvement** arising from SMETA audits, with corrective actions implemented where practicable
- Continued development of a **supplier due diligence process**, including supplier questionnaires and requests for Codes of Ethics
- Continued participation in the **Farm Sustainability Assessment (FSA)** via the SAI Platform
- Completion of a **living wage analysis**, confirming that all Snobelen Farms employees are compensated at or above a recognized living wage benchmark

These actions support our commitment to continuous improvement in ethical labour practices and responsible supply chain management.

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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 integrates human rights considerations into its governance framework, policies, and operational decision-making. Managing Environmental, Social, and Governance (ESG) risks is considered essential to long-term business resilience.

Snobelen Farms is a **SEDEX Member** and continues to undergo **SMETA (SEDEX Members Ethical Trade Audit)** assessments. These audits support transparency and provide structured mechanisms for identifying labour-related risks.

Our policies and practices are informed by recognized standards, including:

- **The Canada Labour Code**
- Applicable provincial and local employment and human rights legislation
- **The United Nations Guiding Principles on Business and Human Rights (UNGPs)**

Snobelen Farms expects employees, suppliers, contractors, and business partners to share our commitment to ethical labour practices and human rights protection.

## 5. Identifying and Addressing Modern Slavery Risks

Snobelen Farms applies a **risk-based approach** to identifying and managing risks related to forced labour and child labour. Our assessment recognizes that agricultural and global supply chains may present inherent risks and that vigilance must be ongoing.

Key elements of our approach include:

- Identification of **SEDEX Member suppliers** and review of available SMETA audit reports
  - Use of **supplier questionnaires** requesting Codes of Ethics and information related to labour practices
  - Ongoing participation in **Farm Sustainability Assessments (FSA)** through the SAI Platform
  - Review of audit findings and development of corrective actions where opportunities for improvement are identified
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## 6. Remediation of Forced or Child Labour

Snobelen Farms' Supplier Code of Conduct and supplier due diligence processes outline clear expectations regarding labour standards.

If forced labour, child labour, or other serious labour violations are identified, Snobelen Farms may take the following actions:

1. Suspension of business relationships where warranted
  2. Engagement with suppliers to support remediation efforts where appropriate
  3. Termination of relationships with suppliers unwilling or unable to remediate identified issues
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## 7. Remediation of Income Loss

To date, Snobelen Farms has not identified any instances of income loss resulting from actions taken to eliminate forced labour or child labour within its operations or supply chains.

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

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



- Standards of Conduct
- Employee Code of Ethics
- Ethical workplace expectations
- Access to an anonymous reporting mechanism

In addition, Snobelen Farms continues to deliver company-wide training focused on:

- Awareness of forced labour, child labour, and modern slavery risks
- Identification and internal reporting of concerns

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## 9. Assessing Effectiveness

Snobelen Farms continues to develop and refine methods to assess the effectiveness of its actions to prevent and reduce the risk of forced labour and child labour. These include:

- Review of SMETA audit findings and corrective action progress
- Ongoing evaluation of supplier engagement and due diligence processes
- Periodic review of internal policies, training, and governance practices

These activities support continuous improvement and inform future enhancements to our approach.

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## 10. Approval and Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains 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 stated.

I have the authority to bind Snobelen Farms Ltd.

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

Samuel S. Snobelen  
President  
Director of Snobelen Farms Ltd.  
May 19, 2026