

George Weston Limited / Loblaw Companies Limited

Modern Slavery **Act Report**

(Fiscal Year 2024)

1. Introduction

At Loblaw, our purpose is to help Canadians *Live Life Well*[®]. A key focus for our business is to advance social equity and we are committed to doing this both nationally and internationally. We recognize our responsibility to respect and protect the human rights of all people who support and intersect with our business, including the rights of our colleagues and employees in our stores and facilities and workers, including migrant and temporary labourers, in our supply chain network. Our customers trust that the products we sell in our stores come from suppliers that provide safe, fair, and ethical working conditions for workers; this expectation is addressed in [Our Position on Human Rights](#).

Loblaw's commitment to prevent and reduce the risk of forced and child labour applies to our network of stores and facilities nationwide, our business partners and our worldwide supply chain network. To preserve the trust our stakeholders have in us, we expect our business partners and suppliers (as well as their agents, brokers, contractors, subcontractors, sub-agents, third parties and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights, employment standards and labour laws.

This report builds on last year's report, published pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") and explains the steps taken to prevent and reduce the risk of forced labour and child labour in our business and throughout our supply chain.

This is a joint report for George Weston Limited¹ ("**GWL**"), Loblaw Companies Limited and its subsidiaries², which have an obligation to publish a report under the Act (collectively, "**Loblaw**" and together with GWL, the "**Companies**").

This report refers to the 2024 fiscal year end, for Loblaw, being December 28, 2024, and for GWL, being December 31, 2024. GWL, as a holding company, substantially relies upon the efforts of Loblaw, as the operating business, for the purposes of managing and monitoring its supply chain operations and compliance programs.

2. Steps taken to prevent and reduce the risk of forced labour and child labour

In 2024, the Companies have taken the following steps to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the Companies or of goods imported into Canada by the Companies. More details on these actions are set out in the Report.

Governance and Training

1. Updates to Loblaw's [Colleague Code of Conduct](#) (the "**Code**") and Code training were made in 2024, specifically setting out our zero-tolerance for involuntary labour practices and use of underage labour. Colleagues across all Loblaw businesses completed their annual Code training and confirmation of their compliance with the Code. GWL's [Code of Conduct](#) includes a commitment to respecting and enforcing human rights directly through its own activities or through its operating companies, including Loblaw. GWL's Board of Directors and colleagues completed their annual Code review and confirmation of their understanding and compliance with Code obligations.
2. Annual review and updates were made to [Loblaw's Supplier Code of Conduct](#) (the "**Supplier Code**") which sets out Loblaw's expectations related to human rights and labour standards for its domestic and international suppliers of goods and services. The updated Supplier Code was made available to Loblaw's supplier network.
3. Mandatory human rights training was completed in September 2024 by those colleagues whose roles may require them to interact with Loblaw's suppliers.

¹ GWL is the controlling shareholder of Loblaw.

² Entities required to publish a report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act and therefore covered by this group report are Loblaw's Inc., LM Canada Holdings Inc., The Real Canadian Liquor Store Limited, Quality Natural Foods Canada Inc., T&T Supermarket Inc., Canda Six Fortune Enterprise Co. Ltd., Shoppers Drug Mart Inc., Sanis Health Inc., Shoppers Drug Mart Specialty Health Network Inc., and MediSystem Pharmacy Limited.

Human Rights Strategy

4. In accordance with Loblaw's Supply Chain Compliance program, in 2024, Loblaw completed more than 1,350 facility (factory) compliance audits³ within our supply chain; and delisted 7 facilities⁴. The audit program is designed to confirm that suppliers providing goods to Loblaw uphold our Supplier Code, which specifically prohibits involuntary labour practices and use of underage labour.
5. Ergon Associates, a leading labour and human rights firm, was engaged in 2023 to complete a [Human Rights Impact Assessment \(HRIA\)](#) on the production of Broccoli and Cauliflower in Mexico, the United States of America (USA) and Canada; geographies from which Loblaw sources such produce, to better understand any risk of forced, child labour, discrimination, harassment and abuse. The HRIA was completed in 2024 and has been published on [Loblaw.ca](#). Based on the findings, practical recommendations were developed for Loblaw to help prevent, mitigate or remediate the most salient negative impacts which Loblaw has control over within the supply chain. Relevant stakeholders at Loblaw are developing specific action plans that are applicable and relevant for the organization.
6. In 2024, Loblaw commissioned a Canadian-based agri-food consulting firm to complete an independent Commodity Risk Assessment (CRA) to identify and address environmental and social risks within our control brand supply chains, with a focus on developing a more sustainable and human rights-conscious sourcing strategy. This assessment flagged ten key commodities – cacao, coffee, palm oil, sugar, beef, banana, rice, cotton, tea, and tomato – as requiring priority attention due to their high-risk profiles and prevalence in Loblaw's product portfolio.

Tracking and Monitoring

7. In 2024, we made enhancements to Loblaw's [Integrity Action Line \(IAL\)](#), a confidential, third-party service that allows employees and suppliers to report unethical, non-compliant, or suspicious activity. The IAL tool was updated to ensure ease of reporting and to provide reporters with clarity at each step in the process. We continue to communicate the IAL through targeted awareness campaigns within the enterprise through corporate messages and visual displays in our network of stores. In addition, IAL information is communicated through our Supplier Code. Suppliers are expected to communicate the requirements of the Supplier Code and details of the IAL to their workers.

Disclosure

8. On [Loblaw.ca](#), Loblaw has made publicly available [Tier 1](#) factories who have made and shipped Joe Fresh branded end-product, including but not limited to, apparel, accessories, jewelry, umbrellas, and footwear⁵. We believe that by providing this information to consumers and our stakeholder partners, we can better coordinate our efforts and support a more sustainable apparel industry.

3. Structure, Activities and Supply Chains

Structure

GWL is a Canadian public company, founded in 1882 and listed on the Toronto Stock Exchange (TSX: WN). GWL is a holding company and the controlling shareholder of Loblaw Companies Limited. Loblaw Companies Limited comprises one of GWL's two operating segments. Loblaw Companies Limited is a Canadian public company incorporated in 1956 and listed on the Toronto Stock Exchange (TSX: L) which operates a food and pharmacy retail

³ The reported number of audits conducted is based on internal tracking systems. While reasonable efforts are taken to ensure accuracy, this metric may be subject to some degree of variation due to the volume of data and the potential for human error, including duplicate entries or omissions.

⁴ The 7 delistings were related to non-compliance with Supplier Code requirements, with 2 delisting due to child labour. During 2024, 2 additional facilities were temporarily delisted for supplier code violations unrelated to forced or child labor. Following corrective actions, verified through on-site audits, both facilities were relisted.

⁵ This list is updated on a semi-annual basis.

business through its subsidiaries. The registered office for each of GWL and Loblaw is 22 St. Clair Avenue East, Suite 700, Toronto, Ontario, Canada M4T 2S5 and the National Head Office and store support office of Loblaw is located at 1 President's Choice Circle, Brampton, Ontario, Canada, L6Y 5S5.

Activities

Loblaw's purpose – helping Canadians *Live Life Well*[®] – is focused on the needs and well-being of Canadians who have billions of interactions with our business every year. As Canada's leading food and pharmacy retailer, Loblaw serves millions of Canadians through its extensive network of over 2,800 stores, pharmacies and Lifemark locations. Loblaw provides convenience and quality to its customers with a wide range of offerings including groceries, pharmacy services, health and beauty products, apparel, and general merchandise. Loblaw, along with its franchisees and associate-owners, employs approximately 220,000 full-time and part-time colleagues and employees. Loblaw, its franchisees, or associate-owners operate retail stores under the banners, which include but are not limited to, City Market[®], Dominion[®], Loblaws[®], Maxi[®], No Frills[®], Provigo[®], Real Canadian Superstore[®], Real Atlantic Superstore[®], Real Canadian Wholesale Club[®], Shoppers Drug Mart[®], T&T[®], Valu-Mart[®], Your Independent Grocer[®] and Zehrs[®]. Loblaw takes pride in its robust control brand programs and markets products in the food, health and beauty and general merchandise categories under a number of brand names, including but not limited to: President's Choice[®], PC[®] Organics, PC[®] Blue Menu[®], PC[®] Black Label Collection, no name[®], Farmer's Market[™], Everyday Essentials[®], Life at Home[™], T&T[®], Quo Beauty[™] and LIFE BRAND[®]. Joe Fresh[®] branded apparel, accessories and footwear are offered at many Loblaw grocery stores, Shoppers Drug Mart stores, stand-alone Joe Fresh stores in Canada and online at JoeFresh.com.

Governance

Loblaw has a robust governance structure in place to ensure our Human Rights programs, policies and practices are operationalized and effective. Senior executive oversight includes a centralized Compliance and Ethics Department that oversees our regulatory compliance and ethics programs, an Environmental, Social and Governance (“ESG”) executive Steering Committee and Supply Chain Compliance department. Board-level oversight is provided by the Risk and Compliance Committee of Loblaw's Board of Directors (the “Board”), whose mandate includes oversight of Loblaw's enterprise risk management process, regulatory compliance and ethics program, ESG, human rights initiatives and corporate policies and practices. Additionally, the Audit Committee of the Board is responsible for the integrity of Loblaw's financial statements and related public disclosure, as well as ESG disclosures.

GWL is focused on advancing its ESG program at the corporate centre and supporting its operating businesses in advancing their own ESG programs based on a shared approach at the Weston Group level. GWL's Board of Directors is responsible for overseeing and monitoring GWL's approach, policies and practices related to ESG matters. The Governance Committee of GWL's Board of Directors is responsible for the oversight of GWL's governance practices, including the development and implementation of good governance principles, consistent with high standards of corporate governance. The Audit Committee of GWL's Board of Directors provides oversight of GWL's legal and regulatory compliance program and its enterprise risk management program and reviews the adequacy and effectiveness of applicable controls related to its ESG disclosures.

Supply Chain

Loblaw globally sources products, inclusive of Loblaw control brand products. Loblaw has developed a line of control brand products that are sold or made available throughout its store and digital networks. Loblaw's product development team works closely with third party vendors to develop and manufacture products for its control brands.

Loblaw actively sources goods for our control brands, inclusive of when Loblaw is the Importer of Record (IOR), from approximately 1,200 factories in 38 countries outside of Canada and the US. The majority of these goods are sourced from the Asia and Southeast Asia regions and include food, non-food, pharmaceutical, and apparel category products for our control brands.

4. Company policies and due diligence processes in relation to forced labour and child labour

Through formal policies, codes of conduct for colleagues and suppliers, comprehensive compliance standards and a robust governance framework, the Companies strive to uphold the rights of customers, colleagues and employees, as well as the many workers, including migrant and temporary labourers, across Loblaw's supply chain. Loblaw is committed to protecting human rights, and pledges to create a safe and inclusive experience for all colleagues and workers across our value chain and the many customers who choose our products

Loblaw's approach to human rights addresses the risk of modern slavery and is supported by its [Colleague Code of Conduct](#), [Supplier Code of Conduct](#) and [Our Position on Human Rights](#), which are publicly available at [Loblaw.ca](#). These three governing documents set out Loblaw's responsibility and expectations to respect and protect human rights. These policies and practices are informed by the following international and industry-leading standards:

- The United Nations' Guiding Principles on Business and Human Rights (UNGPs) and Universal Declaration of Human Rights
- International Labour Organization Conventions
- The Consumer Goods Forum's Forced Labour Priority Industry Principles
- Local human rights laws

GWL is committed to respecting and enforcing human rights, in line with the UNGP. Additional details regarding GWL's commitment to human rights can be found in its [annual ESG Report](#), which is publicly available at [Weston.ca](#).

Colleague Code of Conduct

Loblaw's [Code of Conduct](#) reflects our CORE values of Care, Ownership, Respect and Excellence, and reinforces our commitment to integrity, professionalism and accountability. Respecting and protecting human rights is a focus within our Code. Colleagues are encouraged to apply a human rights lens when conducting business activities and making ethically sound decisions. The Code is managed by the Compliance and Ethics Department and is reviewed annually and updated as necessary. Annual review and updates to the Code were made in 2024.

Supplier Code of Conduct and Contractual Obligations

Loblaw's supplier relationships are guided by the [Supplier Code of Conduct](#). It applies to both domestic and foreign producers and manufacturers that supply goods and services (whether for resale in our network of stores or not for resale), agents, brokers and other third parties (collectively, "**Suppliers**") who conduct business with Loblaw. Suppliers must share the Supplier Code with their contractors, agents, sub-contractors and sub-agents, including any labour agencies who are engaged to assist with providing goods or performing services for Loblaw (collectively, the "**Related Parties**").

Loblaw expects all Suppliers and Related Parties to adhere to the principles outlined in our Supplier Code of Conduct. By entering into standard terms and conditions or other contractual agreements with Loblaw, Suppliers and Related Parties, accept the terms of the Supplier Code and affirm compliance with its requirements. Loblaw's Supplier Code sets minimum expectations and guidelines for Suppliers and obligates them to comply with applicable laws, including those regulations related to forced and child labour. It focuses on worker rights and protections, with a particular emphasis on prohibiting child, forced and trafficked labour, as well as any discrimination, intimidation, abuse, harassment or violence against these workers. Furthermore, Loblaw's Supplier Code requires compliance with laws respecting workers' freedom of association and right to collectively bargain their terms and conditions of employment, which include compensation and working hours. The Supplier Code also requires that a grievance mechanism or complaint procedure exists to allow workers to report workplace concerns. Loblaw keeps records of all contractual counterparties, and our supplier contracts generally contain risk mitigation and enforcement provisions, including audit rights for Loblaw and termination rights based on material breach of contract.

Loblaw's Supplier Code is managed by the Compliance and Ethics Department and is reviewed annually and updated as necessary.

Integrity Action Line (IAL)

Each of GWL and Loblaw have an IAL, which is part of their respective colleague whistleblower programs. Allegations of any breach of our policies or any non-compliant or unethical matters are taken seriously. At Loblaw, the IAL is also made available to all suppliers, related third parties and their workers. Reports to the IAL can be made anonymously and the privacy of the reporter is protected. The IAL tool can be used confidentially online (via a public domain) in English, French or Spanish, or by calling a toll-free number to submit a report in English, French, Mandarin, Cantonese, Punjabi, Spanish and Korean languages. Retaliation against anyone, including colleagues, employees, or workers, speaking up in good faith is strictly prohibited as specified in our Code and Supplier Code.

The Loblaw IAL is administered by the Compliance and Ethics Department and the GWL IAL is administered by the Legal Department, to objectively manage incidents to their resolution and assess any adverse impacts to our operations and/or supply chain. Governance oversight of the IAL is provided by the Risk and Compliance Committee of the Board; which is informed of notable incidents or any emerging trends and themes requiring attention. These may inform changes to the organization's policies and processes.

Enterprise Risk Management

The enterprise risk management (ERM) process is designed to assist all areas of the business in managing appropriate levels of risk tolerance by bringing a systematic approach, a methodology and tools for evaluating, measuring and monitoring key risks, including regulatory compliance and ethics, vendor management and global sourcing, and advancing social equity. The results of the ERM program and other business planning processes are used to identify emerging risks for the Companies, prioritize risk management activities and develop a risk-based internal audit plan.

Improvements relating to Joe Fresh® Apparel Manufacturing

Loblaw has taken significant steps to improve transparency within our international supply chain, specifically as it relates to apparel manufacturing and materials procurement. Loblaw works with leading international apparel brands, non-governmental agencies, and labour groups to improve industry working conditions, benefiting millions of garment workers globally. From 2021 onward, we have expanded our transparency and disclosure by listing the [Tier 1 factory locations for all Joe Fresh branded products](#) on our company website. We believe that by providing this disclosure to consumers and our stakeholder partners, we can better coordinate our efforts and support a more sustainable apparel industry.

5. Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

Loblaw is keenly aware that the global supply chain and the industries in which it operates present risk of forced labour and child labour. In 2022, Loblaw partnered with a third-party expert and leader in sustainability and supply chain services, ELEVATE, to conduct a Human Rights Due Diligence (HRDD) to evaluate our human rights and responsible sourcing procedures and policies against the UNGPs. In partnership with ELEVATE, a multi-step process (including, current state assessment, gap analysis, supply chain risk assessment and stakeholder engagement) was used to identify opportunities to strengthen policies and processes across the enterprise, including our international supply chain.

Through this process, management aligned to [five \(5\) inherent Salient Risks](#) – (1) forced labour; (2) child labour; (3) discrimination; harassment, and abuse; (4) livelihoods; and (5) occupational health and safety, which have informed Loblaw's human rights journey and responsible sourcing initiatives. Salient Risks are defined as those risks having the highest potential impact to people's human rights as a result of the company's activities or business

relationships. As per UNGP guidance, salient risks do not factor in mitigating steps that we as a company may be taking on specific issues; instead, they focus on issues likely to be encountered due to the nature of our business. The measures noted below set out steps taken to assess and manage risk.

Supply Chain Compliance

Loblaw maintains a facility audit compliance program comprised of third-party audit compliance managers and production auditors on the ground in China, Bangladesh, Thailand, Vietnam, Cambodia, and India. The core supply chain compliance team is located in Toronto. This team oversees Loblaw's supply chain compliance ensuring workplace condition assessments are conducted to our standards and that our products are sourced from approved factories. Our audits and audit compliance program are designed to confirm that suppliers providing goods to Loblaw uphold our Supplier Code, including provisions prohibiting forced and child labour. We continuously review the supplier monitoring program to determine if an expanded scope of the program is necessary, specifically if we are made aware of new considerations as they relate to our supply chain.

Prior to sourcing goods from a supplier, Loblaw has the factories, processing facilities, plants, farms, packing or other facilities, which are located outside of Canada and the USA, audited for (1) control brand products sourced by Loblaw; or (2) products for which Loblaw is the Importer of Record.

Once sourcing has begun, Loblaw has processes in place to audit working conditions as well as fire, structural and safety assessments (if applicable). Facilities located in designated high-risk locations, such as Southeast Asia, require a fire, structural and safety assessment to be conducted prior to Loblaw beginning to source from the facility.

Loblaw's audit program reinforces the following factors by assessing and confirming that they are adhered to:

- worker rights and safety
- voluntary labour;
- workers are properly compensated;
- workers are not exploited;
- facilities comply with applicable employment standards (including minimum age);
- working hours are consistent with local laws and standards; and
- facilities meet health and safety laws and regulations.

Initial and annual facility compliance audits are typically conducted by third-party experts using a best-practice audit framework. In some cases, where suppliers provide us with facility compliance audits using an alternative acceptable global framework, the core team conducts an equivalency review to ensure the audit meets our standards. In-market audit teams also provide in person follow-up with remediation audits, additional information audits and verification of corrective actions.

If an audit identifies a compliance issue, including but not limited to, child labour, forced or bonded labour, or life-threatening health and safety situations, Loblaw will suspend relationships with those facilities (and/or supplier). Loblaw will work with suppliers to determine whether satisfactory remediation of the compliance issue is possible and will terminate relationships with suppliers who are unable or unwilling to remediate non-compliance. For serious violations of the Supplier Code, as determined by the supply chain compliance audit program, Loblaw reserves the right to suspend or terminate the relationship before providing the Supplier with an opportunity for resolution.

Human Rights Impact Assessment (HRIA) – Broccoli and Cauliflower

As Loblaw continues its human rights journey and work on salient risk mitigation strategies, it is committed to understanding risks in its supply chain and remediating those actions within Loblaw's control, as well as collaborating with other industry partners, government and NGOs for actions that require larger industry engagement.

As noted above, in 2023 Ergon Associates commenced an HRIA, examining the human rights impacts of broccoli and cauliflower in our supply chain. HRIAs are specialist studies designed to support an organization's due diligence efforts in relation to international standards and frameworks, including the United Nations (UN) Guiding Principles on Business and Human Rights and the Organization for Economic Cooperation and Development (OECD) Guidelines on Multinational Enterprises. It is important to highlight that an HRIA is a sector-wide study, and the process is not an audit or evaluation of specific suppliers or sub-suppliers.

The HRIA was completed in 2024 and published on Loblaw.ca. The scope of the study included broccoli and cauliflower sold as standalone items and as ingredients in value-added products, such as florets, vegetable medleys and packaged salads, whether sold as national brands or under our control brand label. These product categories were prioritized due to their close association with Loblaw's salient human rights risks. To Loblaw's knowledge, no other HRIA has been conducted for these commodities within our operating geography to date (including by other retailers).

The scope included Mexico, the United States of America (Arizona/California), and Canada, with the goal of identifying and addressing potential human rights issues across critical supply chain activities such as primary farming, processing, and packaging of products.

The methodology for the HRIA is designed to systematically identify actual and potential human rights impacts arising from specific business activities and relationships and rank them according to salience. It involved a mix of desk-based research, analysis and direct engagement with internal Loblaw stakeholders, Loblaw's suppliers, industry actors, civil society and a selection of rightsholders across the three countries. In addition, the study also includes information and analysis related to Loblaw's buying practices.

The key salient human rights impacts are noted below. They represent industry wide findings applicable to the broccoli and cauliflower supply chains in Mexico, the US and Canada and were not necessarily identified during site visits to suppliers in Loblaw's supply chain.

- Forced labour
- Child labour
- Working conditions
- Occupational health and safety
- Gender-based violence and harassment (GBVH)
- Right to effective remedy
- Freedom of association and collective bargaining
- Employment discrimination

This assessment identified practical recommendations for Loblaw to prevent, mitigate, and address potential negative human rights impacts within its supply chain. The following recommendations focus on areas where Loblaw has direct influence and can affect change. The recommendations explore enhancements in the following areas:

- Policies, governance and capacity;
- Supplier selection, requirements and monitoring;
- Purchasing practices; and
- Collaboration.

Loblaw will use the recommendations to develop specific action plans that are applicable and relevant for its organization. Loblaw recognizes the importance of promoting ethical sourcing, cultivating sustainable supply chains, and demonstrating responsible investment and due diligence, which ultimately safeguards our business interests and reinforces our commitment to ethical practices. Loblaw continues to prioritize understanding human rights risks within our supply chain, with a focus on forced labour and child labour.

Commodity Risk Assessment

In 2024, Loblaw enlisted a Canadian-based agri-food consulting firm, Groupe AGÉCO, to conduct a comprehensive commodity risk assessment, reviewing commodities used within our control brand portfolio from the lens of environmental and/or social risks. The objective of this assessment was to inform the development of a long-term sourcing strategy that enhances the resilience of Loblaw's supply chain through more proactive management of sustainability risk, including those related to human rights. The outcomes of these evaluations will be used to inform the development process for our control brands. By incorporating the results into our product roadmaps, we aim to enhance the sustainability within our control brand assortment and address the human rights-related impacts within our value chain. Given the wide breadth of risks prevalent within the commodities selected for assessment, specialized expertise was required to ensure a thorough and unbiased evaluation.

Ten key commodities were identified as being particularly vulnerable within Loblaw's supply chain due to exceptionally high environmental and social risks, their high exposure across our control brand portfolios, and current limited internal risk management practices: cacao, coffee, palm oil, sugar, beef, banana, rice, cotton, tea, and tomato.

The assessment evaluated the selected commodities based on two areas of vulnerability: (1) Exposure to Risk; and (2) Risk Management. The social indicators used for the assessment aligned with Loblaw's five inherent salient risks. The firm employed the following methodology to assess these areas:

- (1) Exposure to Risk: This involved analyzing both vendor-specific and region-specific risk data. Vendor-specific risks were assessed through literature reviews, examining the presence and robustness of their policies, targets, strategies, and reporting mechanisms for mitigating social and environmental risks. Region-specific risks were evaluated using a combination of quantitative data and qualitative insights gathered from country-level research on the preparedness of sourcing regions.
- (2) Risk Management: This aspect evaluated Loblaw's existing risk management processes and sourcing guidelines against industry best practices. A peer benchmarking exercise was conducted for each commodity, assessing the risk management strategies employed by other food retailers, including their corporate governance structures, responsible sourcing policies, and vendor engagement strategies.

By incorporating Loblaw's existing risk management processes into the assessment, tailored recommendations to mitigate identified risks within its control brand portfolios were provided to Loblaw. Our Control Brands team is using the results of a recent commodity risk assessment to develop plans that prioritize sustainable sourcing more holistically. These include a focus on sustainable farming practices on coffee, cocoa, and palm oil.

Cotton Sourcing

Loblaw has enhanced its standing pledge with Joe Fresh® apparel, accessories, and footwear suppliers. Joe Fresh prohibits and will not knowingly source cotton or textile products using cotton produced in Uzbekistan, Turkmenistan and the Xinjiang Uyghur Autonomous Region (XUAR) of China due to widespread evidence that these countries employ forced and child labour in their cotton harvests. These regional restrictions are noted in our supplier agreements, and relevant suppliers must complete an annual attestation confirming that they are not sourcing from these regions. This was completed for 2024.

6. Remediation of any forced labour or child labour

Loblaw has an established incident management and escalation process for effectively and promptly handling reports of forced or child labour that may be received through our supply chain compliance program, our [Integrity Action Line](#), Non-Government Organizations (NGOs) or media reports.

Within our Supplier Code, Suppliers are required to monitor the compliance of their operations with the terms of the Supplier Code. Suppliers must share the Supplier Code with any Related Parties, such as their contractors, agents, sub-contractors and sub-agents, including any labour agencies who are engaged to assist with providing goods or performing services for Loblaw. Further, Suppliers are required to monitor Related Parties' compliance per the terms of the Supplier Code and immediately disclose any known violations to the IAL or Loblaw representatives. Such violations are escalated to the Compliance and Ethics Department as necessary. Should a Supplier fail to comply with the Supplier Code, Loblaw reserves the right to require corrective action. For Serious violations of the Loblaw Supplier Code of Conduct, as determined by Loblaw Supply Chain Compliance program, Loblaw reserves the right to suspend or terminate the relationship before providing a Supplier with an opportunity for resolution. If a Supplier fails to implement corrective action or fails to comply with the Supplier Code, Loblaw may, in its sole discretion and without any further obligation to Suppliers, suspend or terminate, in whole or in part, its relationship with the Supplier. Serious or repeated violations by a Supplier may result in factories or suppliers being delisted. At any point in time, Loblaw, at its discretion, may re-evaluate a delisted facility to determine if appropriate remediation has occurred through on-site verification, and resume sourcing.

7. Remediation of 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

To date, there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

8. Training provided to colleagues on forced labour and child labour

The Code, which is updated on a yearly basis, forms part of Loblaw's annual compliance training program that is mandatory for all colleagues within the Loblaw network. The Code and training include a detailed explanation of Loblaw's position on human rights, that involuntary labour (e.g., forced labour and child labour) is not tolerated at Loblaw and what colleagues should do if they become aware of human rights issues. Where colleagues work directly with Suppliers, they are instructed to familiarize themselves with the Supplier Code, and to ensure suppliers understand what is expected of them under the Supplier Code.

Loblaw issued its annual mandatory Human Rights specific training for select store support roles within Procurement, Supply Chain, and Control Brand functions, including, but not limited to:

- Procurement,
- Facility Audit Compliance, including a team in Toronto, and in-market teams in China, Bangladesh, Thailand, Vietnam, Cambodia, and India
- Loblaw Brands
- Joe Fresh®, Product Development, Production and Sourcing
- T&T®, Sourcing

The scope of this training focuses on our policies and due diligence practices to address modern slavery, promoting awareness of our compliance obligations for human rights, identifying key risk factors for human rights violations, reporting any human rights issues and other formal reporting requirements. Human rights training assists in preparing our colleagues to meet our collective responsibility to respect and protect human rights within our operations and supply chain.

9. Effectiveness assessments to ensure that forced labour and child labour are not being used in our business and supply chains

To reduce and prevent the risk of forced and child labour within our operations and supply chains, we assess the effectiveness of our actions to continuously improve our human rights program.

Activity	Measuring Effectiveness
Governance	<ul style="list-style-type: none"> • Risk and Compliance Committee provides oversight for Loblaw’s legal and regulatory compliance and ethics programs, including quarterly reporting on progress • Annual review of Colleague Code of Conduct and Supplier Code of Conduct and review of contract templates, as required, to address mitigation of modern slavery risk • Distribution of updated Supplier Code to existing Suppliers and when onboarding new Suppliers • Annual training on the Code and human rights for impacted colleagues; including training completion percentages
Engagement	<ul style="list-style-type: none"> • Management Board participation and engagement on human rights efforts • Priority of ESG to ensure commitment to supply chain accountability • Engaged with industry and association peers to continuously improve
Enterprise Risk Management	<ul style="list-style-type: none"> • The ERM program provides the business with the necessary guidance and tools to identify, assess, monitor and report risks, including those related to human rights
Monitoring	<ul style="list-style-type: none"> • Number of supply chain audits completed • Findings from the Supply Chain compliance program, including number of facilities delisted • Tracking of corrective actions and remediation of any forced or child labour risks identified • Monitoring NGO and media reports related to risk of forced or child labour and actioning as required
Grievance mechanism	<ul style="list-style-type: none"> • Monitoring Integrity Action Line reports from workers to understand risk and effectiveness of program

Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Loblaw Companies Limited and the Board of Directors of George Weston Limited.

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.

"Barbara Stymiest"

Barbara Stymiest

Audit Committee Chair,
George Weston Limited
February 25, 2025

I have authority to bind George Weston Limited

"Christie J. B. Clark"

Christie J. B. Clark

Audit Committee Chair,
Loblaw Companies Limited
February 25, 2025

I have authority to bind Loblaw Companies Limited