

Joint Report of
Eat Well Investment Group Inc.
and
Belle Pulses Ltd.
In Response to Canada's
Fighting Against Forced Labour and Child Labour in Supply Chains Act
May 2024

Introduction

On January 1, 2024, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) came into force, which requires reporting by entities involved in the manufacture, production, growing, extraction or processing of goods, whether in Canada or elsewhere, as well as the importation of goods manufactured, produced, grown, extracted or processed outside Canada. These measures aim to increase industry awareness and transparency and drive businesses to improve practices, within the supply chain of businesses operating in Canada.

The following is the joint report of Eat Well Investment Group Inc. (“**Eat Well**” or the “**Company**”) and Belle Pulses Ltd. (“**Belle Pulses**”), a wholly-owned subsidiary of the Company, in response to the Act. Our intention with this report is to summarize our current practices which were in place during the year ended December 31, 2023 and to provide insight into future actions. In accordance with subsection 11(3) of the Act, this report provides information on each of the following:

- A. Structure, Activities and Supply Chains
- B. Existing Policies and Processes
- C. Business and Supply Chains Risk
- D. Forced Labour Remediation Measures
- E. Income Loss Remediation Measures
- F. Internal Training
- G. Effectiveness in Avoiding Child Labour

Eat Well is committed to securing our domestic and international supply chain, by choosing suppliers that comply with Canadian and international laws that prohibit forced and child labour.

A. Structure, Activities and Supply Chains

Eat Well is a publicly traded plant-based food ingredient and CPG company headquartered in Vancouver, British Columbia. Eat Well is listed on the Canadian Securities Exchange in Canada under the ticker symbol “EWG”. The Company primarily operates through its wholly-owned subsidiary, Belle Pulses.

Belle Pulses is a small food processor that has been in operation in Saskatchewan for over forty years. It operates two facilities in Saskatchewan (a primary facility in Duck Lake and a secondary facility in Bellevue) and has approximately 45 employees.

Belle Pulses also owns a 51% stake in Belle Pulses, LLC (“BP USA”), which operates a similar facility in Hingham, Montana, USA. BP USA has approximately 7 employees. Belle Pulses and BP USA operate at arm’s length with each other.

The mission statement of Belle Pulses is:

“We are committed to our customers in providing safe high quality processed pulses crop products

that meet or exceed our grading standards and assuring on- time delivery.”

Specifically, Belle Pulses conducts the following business activities:

- Purchases locally produced commodities such as green and yellow field peas;
- Receives, grades, cleans, dehulls and splits raw materials;
- Mills field peas into flour;
- Bags and packages value added products such as: whole Peas, split peas, pea fibre and pea flour;
- Sells agricultural food products (as above); and
- Arranges delivery, including export, of products to customers locally and internationally.

On occasion, some of these functions are done within a larger value chain, through brokers or on behalf of third parties.

The Belle Pulses supply chain consists of 2 main segments: (i) raw materials and (ii) other items. The procurement of raw materials is almost entirely done (99%) within Canada, from Canadian farm producers. On occasion, Belle Pulses procures raw materials from BP USA, which are purchased from USA domestic farm producers. These raw materials account for 95% of our supply chain. Other (non-raw material) items are purchased primarily within Canada. On occasion, items such as machine parts or packaging bags may be ordered from international vendors located in the USA and the European Union. Belle Pulses does not purchase directly from countries.

B. Existing Policies and Due Diligence Processes

While Eat Well and Belle Pulses both have existing policies and processes around the prevention of child labour and forced labour, we also strictly adhere to the laws and norms of the provinces of Saskatchewan and British Columbia and the federal laws of Canada applicable therein. As Belle Pulses is a federally regulated entity, we adhere to both provincial and federal labour laws, whilst choosing the highest ethical bar.

Federally, there are restrictions in the jobs, industry and conditions in which children under the age of 18 can participate. Additionally, children cannot be employed during school hours, cannot work between 11pm and 6am and cannot work in safety sensitive jobs (or tasks).

The following is an excerpt from the Belle Pulses Employee Policy Manual, which is mandatory reading and compliance of all employees of Belle Pulses:

3.2 Child Labor

In Saskatchewan, there is currently no absolute minimum age of employment outside of the five sectors - hotels, restaurants, educational institutions, hospitals and nursing homes.

Current legislation continues to restrict the employment of young people during school hours, in

the sale, handling or service of alcohol, and in certain high-risk occupations. Young people under the age of 14 cannot work unless the employer has a special permit from the Director of Employment Standards and permission of their parents or guardians. Belle Pulses Ltd.'s strictly adheres to the provincial government's Child Labour Laws and minimum age employment laws, where:

- *Young workers under the age of 16 must have the consent of their parent or guardian to work; are not allowed to work after 10 p.m.*
- *Saskatchewan youth aged 14 and 15 must complete Saskatchewan's Young Worker Readiness Certificate Course (YWRCC) and abide by Saskatchewan's Minimum Age Employment laws if they want to work during the school year.*
- *The YWRCC is a mandatory ready-for-work course that teaches youth about*
- *occupational health and safety, labor standards laws and their rights and duties as employees.*
- *Belle Pulses Ltd. does not employ individuals under the age of 14 and is responsible for ensuring that each young worker provides them with a YWRCC certificate, which must be kept on file.*

Furthermore, in Saskatchewan the minimum age of employment rules do not apply to, among other things, (i) family businesses employing only immediate family; (ii) self-employed persons; and (iii) traditional farming operations. Naturally, federal, provincial and international laws and norms of the minimum age of employment do not align perfectly. However, the definition of forced labor generally does align.

Neither Eat Well nor Belle Pulses has historically had a defined due diligence process in relation to forced labour and child labour. In light of implementation of the Act, aimed to increase industry awareness and transparency and drive businesses to improve practices, the Company will seek to develop a due diligence process to support in relation to forced labour and child labour, which will be applicable to the Company's subsidiaries.

Due diligence is a process to identify and respond to the real and potential adverse impacts of activities throughout the supply chain. According to the OECD Due Diligence Guidance for Responsible Business Conduct, the due diligence process and its support measures involve the following steps:

- Embedding responsible business conduct ("RBC") into policies and management systems;
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed

- Providing for or cooperating in remediation when appropriate

To date neither the Company nor Belle Pulses has taken minimal action to assess, address or prevent forced or child labour. Over the next year, the Company, using our internal responsibility system, will begin to truly assess and meaningfully mitigate the impacts of forced and child labour in our supply chain.

C. Forced Labour and Child Labour Risk

As mentioned above, the Company primarily operates through Belle Pulses, a wholly-owned subsidiary of the Company. Belle Pulses, in operating a small business, has a narrow supply chain which can be segmented into 2 categories: (i) raw material and; (ii) other items. Each of these categories can also be further characterized by origin: (a) domestic; and (b) international. Each of these segments has different risks of forced labour and child labour and our ability to easily manage that risk may also differ.

Supply Chain	Raw Materials	Other Items
Domestic	Known and Manageable	Unknown but Manageable
International	Known but less Manageable	Unknown and less Manageable

In general, Belle Pulses has assessed a relatively low risk of forced labour or child labour in its supply chain. According to www.walkfree.org Global Slavery Index, we do not import products from high-risk countries. And according to the USA Department of Labour - List of Goods Produced by Child Labor or Forced Labor, we do not import products that are high risk.

(i)(a) Domestic Raw Materials

The largest portion of our supply chain from a revenue perspective is Domestic Raw Materials. We source these materials directly from farm-based producers. We have an intimate knowledge of these suppliers and the manner in which they conduct their business. They are also already bound by strict forced labour and child labour laws and regulations applicable to Canadian companies.

While agricultural in nature, Canadian farmer produced raw materials that we source are not conducive to manual “hand-picked” labour – which is often equated with forced labour. There is no hand-picking harvest of grain, that might be seen in other cash crops. It is also unlikely that producers would use temporary foreign labour for harvest. Seeding, tending and harvesting of yellow and green field peas along with lentils and dry beans, requires heavy machinery. Operating this equipment requires specialized skills and experience, unlike found in the temporary foreign labour market, for the 6-week harvest season.

To better understand the risk associated with this group, producers can be categorized into 2 categories: (1) Corporate Operated Farms and (2) Family Farms.

- (1) Corporate Farms are generally managed by a management group where employees and contractors are used to conduct business. These businesses are bound by several layers of regulations including occupational safety. It is unlikely that these suppliers would use forced or child labour, as it does not support their business model.

- (2) Family Farms are generally multi-generational groups, that some or all family members participate in farm operations but may also hire additional employees. It is unlikely that these producers would conduct forced labour or child labour, of non-family members, as most of their operation are skilled and do not involve manual harvesting. However, family farms are more likely to use legally acceptable family member child labour. It is unlikely that this is forced labour. It is reasonable and customary for child family members to participate in the operations of the family farm, in Canada. Youth family members of family-owned businesses are exempt from many youth labour restrictions in Canada. The services the child labour would provide are unlikely to be forced and are likely to be appropriate to their age, such as helping elders conduct daily tasks.

To date, the Company has not become aware of any forced labour or child labour cases in our supply chain for Domestic Raw Materials.

(i)(b) International Raw Materials

International Raw Materials are purchased from either: (1) third party grain companies who have purchased the raw materials from various sources including farm producers; or (2) brokers that connect buyers and sellers but do not take direct possession of the raw materials. These International Raw Materials are purchased only from the USA and primarily from BP USA. Belle Pulses does not import raw materials from countries other than Canada and USA.

In both cases, it is unlikely that either of these suppliers use forced or child labour. The State of Montana and the United States of America have forced and child labour laws and regulations which would be applicable to all of the Company's suppliers of International Raw Materials. Furthermore, the nature of their business does not lend itself to benefiting directly from forced or child labour. None of the raw materials Belle Pulses sources is manually harvested or processed.

To date, the Company has not become aware of any forced labour or child labour cases in our supply chain for International Raw Materials.

(ii)(a) Domestic Other Items

Other Items such as office products, services and machinery, purchased in Canada, constitute a small portion of our supply chain. However, some of these items may have been imported by the Canadian supplier or vendor. Furthermore, some products may be imported and then assembled in Canada. Thus, "Made in Canada" by parts that may be international, perhaps subject to forced or child labour. At this point, we are not fully aware of the risks associated with these suppliers.

(ii)(b) International Other Items

Other Items purchased internationally are the smallest portion (<1%) of our supply chain. These are items such as machine parts. While these items are purchased from countries that are low on the Global Slavery Index risk list, the products (all or in part) may have originated in a regions where forced or child labour may be prevalent. At this point, we are not fully aware of the risks associated with these suppliers.

D. Remediation Measures

Remediation refers to both the process of providing remedy for an adverse impact and to the substantive

outcomes that can counteract, or “make good,” the adverse impact. As the Company and Belle Pulses have not been aware of any forced labour or child labour cases in our supply chain, we have not had to take any measures to remediate forced labour or child labour in our supply chain. Over the coming years, the Company will fully assess the risk of force or child labour within our supply chain and remediate as needed.

E. Remediation of Loss of Income

Efforts to prevent and reduce the risk of forced labour and child labour within our supply chain may have the unintended consequence of contributing to a loss of income, for vulnerable families. As the Company and Belle Pulses have not been aware of any forced labour or child labour cases in our supply chain, we have not had to take any measures to remediate loss of income from measures taken to eliminate forced labour or child labour in our supply chain. Over the coming years, the Company will assess the impacts of force or child labour mitigation within our supply chain and remediate as needed.

F. Training

The Company and Belle Pulses recognize the importance and role of the provision of information and training in supporting the Act and achieving outcomes in preventing forced and child labour in the Canadian Supply Chain. In particular, training on forced labour and child labour may take a range of forms, from formal training courses to awareness-raising activities for employees. Belle Pulses has a statement prohibiting forced and child labour, within our facilities and operations, that all employees are aware; however, no formal training has been conducted. Over the coming years, the Company will assess and implement the need for further training.

G. Assessing Effectiveness

While the Company and Belle Pulses have taken no actions to assess their effectiveness in preventing and reducing risks of forced labour and child labour in our activities and supply chains, we are committed to doing so. We expect that over the coming years, the Company will implement reasonable actions to assess and prevent forced and child labour within our supply chain. Our plans toward this end, will involve a mechanism to assess our effectiveness.

Conclusion

Each of the Company and Belle Pulses are committed to support the intentions of the Act. While we have not completed substantial actions toward this end to date, over the next couple of years we will continue to develop a plan to secure a compliant domestic and international supply chain. We expect this plan will include:

- Updating policies and management systems
- Identifying and assessing adverse impacts
- Mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed

- Providing for or cooperating in remediation when appropriate

We will use our internal responsibility system to: involve stakeholders, institute standards, identify risks, investigate incidents, improve conditions and inform staff, toward incremental process improvement. We will also report our progress internally at our quarterly management meetings. Finally, we will summary the steps taken in the previous financial year to prevent and reduce the risk the of forced labour or child labour and report annually to the federal government as required by the Act.

This report has been reviewed and approved by the board of directors of Eat Well, the principal governing body of the Company, which controls each entity included in this report, in accordance with subsection 11(4)(b)(ii) of the Act.