

Founders Group Holdings Inc. Canada Modern Slavery Act Report For the year ended 31 December 2025

About this Statement

This is a joint statement of the steps Founders Group Holdings Inc. ("Founders") has taken in an effort to ensure slavery and human trafficking are not taking place in our supply chain or business and covers Founders' fiscal 2025, the period of 12 months ending on December 31, 2025. The following document serves as a statement complying with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Founders has used the processes outlined in this statement during the previous financial year 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 entity or of goods imported into Canada by the entity.

The process of preparing this statement involved the participation of a wide range of internal stakeholders across many functions of Founders. For the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, this is a joint statement for the required reporting entities, Founders Group Holdings Inc. and its wholly-owned subsidiaries (hereinafter referred to as "Founders"): Founders Group Inc. and Presteve Group Inc. The activities of additional non-reporting group companies, including Rainier Pure Beef Company, Durham Meat & Seafood Inc., and Totally Chocolate LLC, are described in this report on a voluntary basis where relevant to the group's overall approach.

Reporting entities with business numbers are as follows:

Founders Group Holdings Inc. 726208416
Founders Group Inc. 706420528
Presteve Group Inc. 125924142
Presteve Inc. 731153946
Presteve Foods Limited 769139411
Saco Fisheries Limited 731142147
La Nassa Foods Inc. 731147740

All other entities included in Founders Group Holdings Inc. are not required reporting entities under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Structure, Activities and Supply Chains

Founders is committed to respecting and upholding human rights, where teams are continuously focused on winning in the marketplace, developing the strength and scalability of themselves and their businesses, creating working lives that are more rewarding for all and

making a positive impact on society. Founders is a corporation in Canada which conducts all of its operations through its wholly-owned subsidiaries. Founders markets, produces, manufactures, sells and distributes fresh and frozen meat and seafood, custom chocolate and dry food products to customers. These customers include restaurants, partner broadline distributors, eCommerce food businesses, institutional food distributors, grocery retailers and individual consumers. Founders also has export sales to distributors in Asia, Europe and Latin America. Founders employs an average of 280 employees in Canada and 600 employees in the USA.

Founders is headquartered in Vancouver, Canada, and operates manufacturing facilities, sales, administration and warehouses in Canada and the USA across 8 locations.

We work primarily with suppliers in Canada and the USA. The principal raw materials we use are meat, fish, seafood, chocolate and biscuits. We also use cardboard, packaging materials, operating supplies and energy. A majority of these inputs are purchased from suppliers in Canada or the USA, where suppliers may import from other countries along their supply chains.

Under the activity categories prescribed by the Fighting Against Forced Labour and Child Labour in Supply Chains Act, the reporting entities (a) produce goods in Canada (Presteve Foods Limited operates fish processing facilities in Ontario); (b) import into Canada goods produced outside Canada (Presteve imports certain seafood ingredients and finished product); and (c) control other entities engaged in producing and importing goods.

Policies and Due Diligence Processes

Founders completes a risk assessment of each subsidiary upon acquisition as part of our due diligence procedures, which includes risks in supply chain and labour. Ongoing risk assessments are conducted by management as needed. The Board of Directors provides oversight and receives regular updates from management teams on a monthly and quarterly basis which includes monitoring and approving strategies and policies relating to supply chain and labour.

We are committed to working with current and prospective suppliers to uphold ethical business practices. These policies include:

1. Governance Model — Founders' Governance Model is intended to outline expectations on compliance with relevant laws, regulations and binding agreements, guidance on shareholder and board interaction, financial reporting requirements and policy updates.
2. Employee Manual — Employee manuals provide guidance to all employees on expectations for employee conduct and compliance with relevant laws and regulations.
3. Country of origin review — Procurement teams use a series of questions that cover general administrative information as well as 3rd party audit certifications and other regulatory food safety standards as part of supplier and purchasing reviews. During FY2025, Durham Meat and Seafood Inc. completed a formal country-of-origin project requiring all vendors to identify the countries from which their products are sourced.

4. Compliance with FDA, CFIA, and other regulatory food safety standards — This includes compliance with food safety and regulatory audits.
5. Standard terms and conditions of purchase — Used at Durham Meat & Seafood. This is sent to suppliers each year, which prohibits human rights violations and requires attestation that the supplier complies with all human rights laws, including, without limitation, prohibitions on child labor, slavery, and human trafficking, in the countries in which it does business, and the producers or providers of any Ingredients comply with all human rights laws in the countries in which they do business.
6. Human Rights, Fair Labour and Anti-Human Trafficking Policy — Used at Presteve. During FY2025, Presteve refreshed this policy to include a formal remediation procedure outlining the steps to be taken if instances of human trafficking, forced labour, or child labour are identified, and Presteve also implemented a Supplier Code of Conduct setting clear expectations for compliance with labour laws, including the prohibition of forced labour, child labour, and human trafficking.
7. Supplier auditing and monitoring — Used at Totally Chocolate. Totally Chocolate continues to audit and monitor its suppliers, particularly those whose products contain cocoa sourced from countries with higher recognised risk of forced and child labour.

Forced Labour and Child Labour Risks

Founders has continued the process of identifying risks, but there are still gaps in our assessment. Identification of risk does not mean that forced labour or child labour was or is actually being used in the group's activities or supply chains; rather, it reflects the areas where the group has considered how its activities and supply chains could potentially contribute to such risk. Our risk assessment identified potential risks of forced labour and child labour relating to the following:

- Industries we operate in — vertically integrated fish harvester, processor and distributor which carries risk in fishing and seafood processing activities, an industry recognised globally as carrying elevated forced labour risk. This is managed through Presteve's Human Rights, Fair Labour, and Anti-Human Trafficking Policy and supplier Code of Conduct. In FY2025, Presteve completed a SMETA four-pillar audit conducted by an independent third party, covering Labour Standards, Health and Safety, Environment, and Business Ethics; the Labour Standards review specifically evaluated forced and child labour practices.
- Products it produces, purchases, or distributes — Meat, fish or seafood imported by suppliers in Canada or the USA which require fishing and seafood processing from tier three suppliers. Building on prior-year reviews, Durham Meat & Seafood conducted an internal review of all items processed in China following reports of potential forced labour in some Chinese seafood processing plants. In most cases, these items have been transitioned to production plants in alternative locations. Durham Meat & Seafood previously identified its highest-risk seafood supply chains and continues to request audit data from suppliers in these categories.
- Products it sources / raw materials or commodities used in its supply chains — Chocolate purchased from suppliers in Canada or the USA contain cocoa that can be sourced from countries with higher risk of forced labour or child labour. Assessment of suppliers is completed as part of initial supplier due diligence. Key suppliers provide their internal policies and processes on managing the risk of forced labour. Totally Chocolate

continues to audit and monitor its suppliers and to engage with US-based chocolate suppliers regarding traceability back to source farms where this information is available.

- Tier-three and further-down suppliers across the group — Across the group, the most significant residual risk lies with tier-three and further-down suppliers, where direct visibility is more limited. The group is building visibility through country-of-origin mapping, supplier audit data requests, supplier attestations, and supplier Code of Conduct.

We have not identified any forced labour or child labour in our activities and supply chains.

Remediation

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

Remediation of loss of income

Not applicable, we have not identified any loss of income to vulnerable individuals and families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Training

The following programs are conducted for higher risk areas:

- Mandatory training at Presteve on its refreshed Human Rights, Fair Labour, and Anti-Human Trafficking Policy for all employees during onboarding, with periodic refresher communications throughout the year.
- Purchasing team for chocolate requires suppliers to provide internal policies and processes.
- Purchasing teams for meat, fish and seafood require due diligence checks for new suppliers and country of origin reviews.

Assessing Effectiveness

Founders is committed to upholding responsible supply chains and recognizes the importance of continuous processes to identify and address any instances of forced and child labour throughout our businesses and their supply chains. During FY2025, the group took the following concrete steps to assess effectiveness: (a) Presteve underwent an independent four-pillar SMETA audit that included Labour Standards; (b) Presteve refreshed its Human Rights, Fair Labour, and Anti-Human Trafficking Policy and implemented a Supplier Code of Conduct; (c) Durham Meat and Seafood completed a country-of-origin mapping project covering its vendor base; and (d) Durham Meat & Seafood completed an internal review of its China-sourced seafood items and transitioned the majority to alternative sources. We will continue to assess the effectiveness of our existing approach by conducting internal reviews to assess strengths and opportunities. We will develop procurement practices to mitigate risks of forced and child

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labour, including expanding our supplier risk assessments to gain a deeper understanding of potential exposure, periodic supplier reviews and continued training.

Board Approval and Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I attest that I have reviewed the information contained in the report on behalf of the governing body of 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.



Richard Harris

President & Board Director

25 May 2026

I have the authority to bind Founders Group Holdings Inc. and its wholly-owned subsidiaries.