

## 1. Introduction

This Report is produced by Acadian Seaplants Limited ("**ASL**") for the financial year ended March 31, 2025 (the "**Reporting Period**") and sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods inside or outside of Canada, the sale of goods inside or outside of Canada, and the importing of goods into Canada by ASL.

This Report constitutes the second report prepared by ASL pursuant to Canada's new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").

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

ASL has adopted various code of conduct policies and procedures to address human rights and labour standards within our company as well as within our supply chains. ASL joined the United Nations Global Compact ("UNGC") in 2023 and supports its principles, including human rights, labour, environmental and anti-corruption. ASL is also working towards joining EcoVadis, a globally recognized assessment platform that rates businesses' sustainability based on environmental impact, labour and human rights standards, ethics and procurement practices.

ASL has taken the following steps to prevent or reduce the risk of forced labour and child labour:

- a) conducted an internal assessment of risks of forced labour and/or child labour in ASL's activities and supply chains;
- b) implemented a Business Code of Conduct in May, 2022;
- c) implemented a Supplier Code of Conduct in September, 2023; and
- d) developed a training program for ASL employees.

Details of the above actions are set out in this Report.

# 3. Structure, Activities and Supply Chain

ASL is incorporated under the Nova Scotia *Companies Act.* Headquartered in Dartmouth, Nova Scotia, ASL was founded in 1981 as a family-owned seaweed company nestled in the heart of Atlantic Canada. Our vision, passionate people and an incredible renewable resource carried us onto the global stage. Now, we offer sustainable, high-quality and research-based solutions that satisfy the vital needs of plants, animals and people. ASL has two main business divisions, Acadian Plant Health™ and Human & Animal Wellness.

Acadian Plant Health™ is a biostimulant company with a core focus on sustainable, science-based biological solutions for specialty and broad-acre crops. Acadian Plant

Health™ is committed to launching patented innovative products, with a focus on regenerative and climate-smart agriculture. Acadian Plant Health™'s world-leading crop science research and proprietary extracts comprise the foundation of the agricultural solutions we offer. We deliver key functionality to meet agricultural needs worldwide in the areas of performance and sustainability. Acadian Plant Health™ products are used in soil and foliar inputs on over 100 crops in over 80 countries.

Human & Animal Wellness can help you stay ahead of the next wave of innovation, providing our premium seaweed products to customers such as restauranteurs, nutritionists, cosmetic and pharmaceutical companies. Our products are also proven to provide animals with nutrients and prebiotics they need at the gut level to foster greater performance, immune health, and resilience to environmental stress.

ASL has over 400 employees worldwide with five manufacturing and production facilities focused around key harvesting areas, including Canada, Scotland and Ireland and two research and development facilities in Canada and the UK.

In ASL, we purchase our chemicals from international distributors, all of which have systems in place to ensure they are sourcing from reputable suppliers following international guidelines on forced labor, anti-bribery, health & safety, quality and safe working conditions. We direct source some raw materials and will do more in the future. In tandem with our Supplier Code of Conduct, we have implemented a Supplier Qualification Program wherein we send an in-depth questionnaire to all potential suppliers and toll manufacturers. Once completed, these questionnaires are reviewed by an internal team, including members from our Technology, Supply Chain, Quality, and Business Excellence departments. ASL only sources from suppliers that are positively scored and approved. We also conduct on-site audits of potential suppliers to verify the responses provided in their questionnaire.

## 4. Policies and Procedures

#### a) Business Code of Conduct

In addition to ASL's commitment to upholding human rights through the UNGC, we have specifically included prohibitions against forced labour and child labour in our Business Code of Conduct as follows:

#### "7. HUMAN RIGHTS AND LABOUR STANDARDS

- 7.1 Acadian Seaplants operates across many jurisdictions with varying laws and standards. We will operate ethically in all locations. In particular, we will not tolerate forced labour (also known as modern slavery), human trafficking or illegal child labour occurring anywhere in our supply chain or distribution networks. We are committed to:
  - 7.1.1. only working with suppliers, distributors and partners who adopt the same ethical practice;
  - 7.1.2. promoting best practices in our procurement processes to eliminate the risk of forced labour, human trafficking, or child labour;

- 7.1.3. ensuring that our customers can be confident that the products they purchase from Acadian Seaplants are untainted by any form of forced labour, human trafficking, or child labour; and
- 7.1.4. understanding the heightened risk that may occur in some territories and tailoring our approach accordingly."

Employees are encouraged to report any concerns, including those involving business conduct issues. If an employee is uncomfortable discussing their concerns internally, ASL offers an ASL ReportLine, which is a confidential reporting service managed by an independent organization. This service is available online or by phone toll-free, 24 hours a day, seven days a week, anywhere in the world. It is also available in English, Portuguese, Spanish and Chinese.

# b) Supplier Code of Conduct

In September, 2023 ASL implemented its Supplier Code of Conduct (the "Supplier Code"), which can be found here: <a href="https://www.acadianseaplants.com/supplier-code-of-conduct/">https://www.acadianseaplants.com/supplier-code-of-conduct/</a>. The Supplier Code applies to all suppliers that provide goods to ASL for use in manufacturing or for resale. Suppliers are responsible for compliance with the standards set out in the Supplier Code throughout their operations and throughout their entire product supply chain.

Our Supplier Code specifically includes prohibitions on slavery and human trafficking as follows:

## "Slavery and Human Trafficking

Suppliers must not engage in slavery or human trafficking, which are prohibited throughout the supply chain. All labour must be voluntary. Slavery includes any type of compelled, involuntary, or forced labour, including, but not limited to:

- shall not engage or support child labour;
- bonded labour:
- indentured labour; and
- prison labour.

Workers have the right to engage in work voluntarily, and Suppliers must not require workers to:

- surrender control over original identification papers or documents giving foreign workers the right to work in the country; or
- pay fees for the right to work.

Supplier must ensure that workers have the right to freedom of movement, including the right:

- to leave Supplier's facilities upon reasonable notice and at the end of each workday;
  and
- to terminate their employment or work arrangement [without restriction/upon reasonable notice] and without the requirement to pay any fees."

Our Supplier Code also includes prohibitions against discrimination, abuse and harassment, as follows:

"Supplier must not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, colour, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

Supplier must treat workers with respect and dignity.

Supplier must not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Supplier must not condone or tolerate such behaviour by its suppliers and subcontractors."

Suppliers are encouraged to report any violations of the Supplier Code:

## "Report Violations

Please report any violations of the Code of Conduct. Your report will be kept confidential. You can also submit your questions and comments regarding the Code of Conduct to Acadian Seaplants Limited by sending an email to the attention of General Counsel, email address: generalcounsel@acadian.ca.

Acadian Seaplants Limited will not tolerate retaliation taken by Supplier against any worker who has, in good faith, reported violations or questionable behaviour, or who has sought advice regarding the Code of Conduct."

# 5. Training and Assessing Effectiveness

During this Reporting Period, and in addition to ASL's policies in place to reduce the risk that forced labour or child labour is used in our activities and supply chains, ASL began development of a training program to educate all ASL employees and provide increased general knowledge of what human trafficking and forced labour are, how to spot the signs, and what to do if you encounter an instance of potential human trafficking. We expect this training program to be rolled out during our next Reporting Period.

# 6. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Acadian Seaplants Limited.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I, the undersigned, 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.

ACADIAN SEAPLANTS LIMITED

Jean-Paul Deveau

Executive Chairman

May 27, 2025

I have authority to bind Acadian Seaplants Limited