



Freshwater Fish Marketing Corporation

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN  
SUPPLY CHAINS

2024 Report

## Table of Contents

<b>About this report.....</b>	<b>2</b>
<b>Structure, activities and supply chain .....</b>	<b>2</b>
<b>Policies, processes, and due diligence .....</b>	<b>3</b>
<b>Risk assessment and identification.....</b>	<b>5</b>
<b>Remediation and corrective measures .....</b>	<b>5</b>
<b>Assessment of effectiveness .....</b>	<b>5</b>
<b>Training and awareness .....</b>	<b>5</b>
<b>Attestation .....</b>	<b>6</b>



## 1. About this report

This report has been prepared pursuant to the [Fighting against Forced Labour and Child Labour in Supply Chains Act](#) (the Act), and sets out the measures taken by the Freshwater Fish Marketing Corporation (FFMC, or the Corporation) during the 2024 fiscal year ending on April 30, 2024 to prevent and reduce the risk of forced labour or child labour in our operations and supply chain. FFMC recognizes that risks of forced labour and child labour (referred to as modern slavery) exist and acknowledge that understanding and managing these risks requires collaboration with our suppliers, fish harvesters, our employees, and other external stakeholders. When used in this report, the terms ‘forced labour’ and ‘child labour’ have the meanings ascribed to them by the Act.

## 2. Structure, activities and supply chain

### 2.1 Structure

FFMC is a federal Crown corporation established in 1969 under the [Freshwater Fish Marketing Act](#) (FFMA), for the purpose of marketing and trading in fish, fish products, and fish by-products in and outside Canada. The Corporation must conduct its operations on a financially self-sustaining basis, without parliamentary appropriations.

### 2.2 Activities and supply chain

The Corporation purchases all fish legally caught and offered for sale in its mandate regions, which encompass Alberta and the Northwest Territories. These jurisdictions participate under agreements with the Government of Canada. The Corporation also purchases fish from outside its mandate regions from individual fish harvesters or fisher cooperatives in the United States, Ontario, Saskatchewan, and Manitoba. FFMC achieves its purpose by focusing on the specific activities set out in the FFMA and priorities set by the Government of Canada, which are:

- marketing fish in an orderly manner;
- promoting international markets for fish;
- increasing interprovincial and export trade in fish; and
- increasing returns to commercial fish harvesters.

In its supply chain, FFMC sells processed fish products created from raw material supplied by fish harvesters. To support the processing of fish into finished products, FFMC also does business with service providers and international, national, and regional suppliers. FFMC sources fish, processing supplies and services primarily from domestic sources and secondarily from the United States. In the 2024 fiscal year, 78% of FFMC’s procurement spend was with Canadian suppliers.

Our main suppliers provide a wide range of goods and services, which include:

- freshwater lake wild-caught fish;
- food processing equipment and machinery;
- building infrastructure and maintenance;
- information and technology products and services;
- operational services (i.e., consulting, legal, engineering, cold storage); and
- transportation and logistics.



### 3. Policies, processes, and due diligence

FFMC is committed to respecting and promoting the highest standards of ethics and integrity in all its dealings with employees, customers, suppliers, fish harvesters, and the communities in which we live and work. Fairness, respect, and integrity are core values for FFMC. FFMC's approach to modern slavery is supported by its Code of Conduct and sets out the process to report violations and embraces the Corporation's approach to human rights.

FFMC maintains a process for receiving and dealing with feedback and will regularly monitor and evaluate feedback to incorporate into future reports where possible. If you have any questions, feedback, or suggestions, please contact us:

ATTN: Human Resources  
 Address: Freshwater Fish Marketing Corporation, 1199 Plessis Road, Winnipeg MB, R2C 3L4  
 Telephone: 204.983.6601  
 Email: [hr@freshwaterfish.com](mailto:hr@freshwaterfish.com)

Feedback Process:

1. Feedback will be received by either telephone (and transcribed to an accessible Word document), mail (and scanned to a pdf) or e-mail.
2. All feedback will be saved in a designated electronic folder.
3. The sender of any feedback will be notified that it has been received and their input will be reviewed.

#### 3.1 Governance

FFMC is committed to maintaining a strong governance framework that guides our leadership and strengthens the reputation and value that we have earned across global and domestic markets. We are committed to supporting the principles designed to fight against modern slavery, to meet our legislated mandate, and to maintain the Corporation's role in Canada's western and northern freshwater fishery for the Government of Canada.

The Board of Directors (the Board) has overall responsibility to oversee the management of the Corporation's business and affairs. In exercising its powers and performing its duties, the Board acts honestly and in good faith with a view to the best interests of the Corporation, which involves considering the interests of fish harvesters, employees, and our sole shareholder, the Government of Canada, in accordance with our governing by-laws and applicable legislation.

To fulfill its stewardship responsibilities, the Board establishes and approves Freshwater's strategic direction through a five-year Corporate Plan, and reviews and approves major strategies and goals. It exercises due diligence by assessing risks and opportunities, ensuring the integrity of financial results, and providing timely reports to the Government of Canada.

The Governance Committee is responsible to assist the Board in its oversight duties by evaluating and recommending to the Board corporate governance practices applicable to the Corporation. The Governance Committee, among other things, helps the Board to ensure that FFMC management has established appropriate policies and procedures, oversee activities and disclosure related to corporate responsibility, and follow appropriate practices with respect to applicable laws and the spirit and intent



of relevant government guidance and stated goals. The Committee also leads the Board in its review and assessment of the Board's performance.

### 3.2 Employee code of conduct

FFMC's Code of Conduct outlines the required behaviours for management and employees. The Code of Conduct aims to ensure that FFMC will conduct its business fairly, impartially, in an ethical and proper manner, in full compliance with all applicable laws and regulations, and consistent with FFMC's values. In conducting its business, integrity must underlie all relationships, including those with customers, suppliers, fish harvesters and among employees. The highest standards of ethical business conduct are required of FFMC employees in the performance of their responsibilities. Employees are required to not engage in conduct or activity that may raise questions as to the Corporation's honesty, impartiality, reputation or otherwise cause embarrassment to FFMC.

### 3.3 Supplier code of conduct

As of April 30, 2024, FFMC is in the process of developing its Supplier Code of Conduct (SCC). FFMC's SCC will spell out the principles and expectations as to how suppliers that provide goods and services to the Corporation are to conduct business with and deal with the Corporation. The code will be principles-based and will set out our expectations of suppliers to ensure their behaviour demonstrates business integrity, responsible business practices, responsible treatment of individuals and adherence to privacy and information and data management protocols. To ensure adherence to the SCC, FFMC will monitor compliance, which may require suppliers to periodically confirm in writing that they meet the expectations of FFMC's SCC. FFMC's SCC will be completed and deployed to its suppliers in 2025.

### 3.4 Corporate responsibility plan

As of April 30, 2024, FFMC is developing a Corporate Responsibility Plan (CRP) that will require suppliers to have appropriate management policies and procedures in place to maintain workplaces characterized by professionalism, respect for the dignity of every individual with whom their employees interact, including respect for differences such as gender, gender identity, gender expression, race, colour, age, disability, sexual orientation, ethnic origin, and religion. Suppliers must not tolerate harassment, discrimination, violence, retaliation and other disrespectful or inappropriate behaviour.

The CRP will require suppliers to abide by applicable employment standards, labour, non-discrimination, and human rights legislation and to demonstrate that in their workplace child, forced or compulsory labour is not used, discrimination and harassment are prohibited, retaliation for speaking up is prohibited and employees are free to raise concerns without fear of reprisal, and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements. FFMC's CRP will be completed and deployed to its suppliers in 2025.



### 3.5 Due diligence

As of April 30, 2024, no formal steps nor actions have been taken to collect and analyze data from suppliers to assess their performance or compliance with policies related to modern slavery. Upon completion and distribution of the SCC and CRP, supplier compliance will be assessed.

## 4. Risk assessment and identification

### 4.1 Operations analysis

FFMC's workforce is largely comprised of specialized, unionized fish processing employees and office workers. Therefore, we consider there is a low risk of forced labour or child labour in our direct operations. In addition, all of FFMC's workforce is employed in Canada.

### 4.2 Supply chain analysis

Since FFMC purchases many goods both domestically and internationally, we acknowledge a risk that modern slavery may be used in our extended supply chain. We understand the importance of risk mitigation and relationship management throughout the procurement process, including complying with the Act. To accomplish this, we will adopt a multi-pronged approach to managing opportunities and risks in our supply chain as to how we select our suppliers.

## 5. Remediation and corrective measures

As FFMC has not identified any modern slavery in its business or supply chain, the Corporation has not taken any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains

## 6. Assessment of effectiveness

FFMC is committed to addressing the risks of forced labour and child labour in our business and supply chains. As described in this Report, FFMC is introducing a number of measures to prevent and reduce these risks. However, to date, no actions have been taken to assess the effectiveness of these measures.

## 7. Training and awareness

FFMC reviews its Code of Conduct with every new employee as part of the Corporation's onboarding process. Management and employees are also required to regularly certify their compliance with the Code of Conduct. While the Code of Conduct does not directly address issues of modern slavery, it affirms the Corporation's commitment to ensuring employees adhere to the highest ethical standards. We anticipate providing training on the issues of modern slavery to employees in 2025 through enhanced training on the Code of Conduct



## 8. Approval and attestation

This report has been approved in accordance with the provisions of section 11(4)(b)(ii) of the Act by the Board of Directors of FFMC for the fiscal year ending April 30, 2024. In accordance with the requirements of the Act, and in particular section 11 thereof, I certify that I have reviewed the information contained in the report for the entity or entities listed above. To the best of my knowledge and having exercised due diligence, I confirm that the information contained in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year referred to above.

I make the above attestation in my capacity as a director of the Board of Directors of the Freshwater Fish Marketing Corporation for and on behalf of the Board.

I have the authority to bind the Corporation.



---

Stan Lazar  
President and Chief Executive Officer  
May 31, 2024

