

Great Western Brewing Company Limited

Modern Slavery Act Report

2023 CANADIAN REPORT

FOR THE YEAR ENDING DECEMBER 31, 2023



Approved: May 1, 2024

Introduction

The Fight Against Forced Labour and Child Labour in Supply Chain Act (the “Act”) requires that businesses state the actions they have taken during the last fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. The purpose of the Act is to implement Canada’s international commitment to contribute to the fight against forced labour and child labour through reporting obligations.

Ensuring we operate in a transparent, ethical, and accountable manner is embedded in the heart of one our core values “Doing it right, the right way.” For over 30 years Great Western has had the privilege of brewing numerous varieties of world class beer and other beverage alcohols in Saskatoon, SK for Western Canadian communities, and consumers to enjoy while they make shared times more memorable and fun.

Corporate Structure

Great Western Brewing Company Limited is a privately held entity that was incorporated in the province of Saskatchewan (Corporation # 592277) on November 17, 1989. Its registered head office is located 519, 2nd Avenue North, Saskatoon, Saskatchewan, S7K 2C6.

Great Western relies exclusively on its brewery located in Saskatoon, SK to produce its beer and beverage alcohol products which are sold within the provinces of British Columbia, Alberta, Saskatchewan, and Manitoba. On December 31, 2023, we employed approximately 100 people throughout Western Canada.

Given our centralized approach to management, limited region in which we conduct business, and the brewing industry’s propensity to procure local ingredients Great Western does not undertake in many activities it considers risky under the Act, however, certain of Great Western’s procurement activities are relevant.

Activities

The Act requires Great Western to report on activities in relation to the production, sale, distribution of goods both in and outside of Canada, and the importation of goods into Canada.

Great Western purchases a range of goods and services used in the production and sale of our consumer-packaged products including barley, labour, water, cans, kegs, packaging materials, vehicles, flavouring agents, promotional items, and machinery. These goods and services are used in production from our Saskatoon facility and to facilitate sales throughout Western Canada. Most of our suppliers are geographically aligned with our Canadian operations, 99% of our operating expenses are with North American suppliers.

There are typically 3 occasions where Great Western will source goods and services from outside North American:

- 1) Importing brewing & packaging manufacturing equipment and parts from European OEM suppliers that do not have operations in North America,
- 2) Sourcing specialty varieties of European flavouring hops used in brewing.

- 3) Utilizing North American third-party suppliers to source & procure sales promotional items to aid in the sale of our products.

Steps Taken to Prevent and Reduce the risk of Forced Labour or Child Labour

In 2023, Great Western Brewing Company has taken the following steps to prevent and reduce the risk that forced labour or child labour is used at any point in the supply chain process we rely on for producing and selling our products.

This report and Great Western's existing corporate governance policies, including the employee handbook, and Director's code of conduct are reviewed in coordination with our Human Resource professionals during the onboarding process to ensure new starts are informed on conduct expected. These documents outline the basic legal and ethical obligations all employees/directors must adhere to.

In 2023, we also worked to better understand reporting obligations under the Act as they pertain to Great Western Brewing Company. Among other things, we:

- Began preparing an employee code of conduct which will include addressing anti-forced labour and child forced labour standards covered under the Act.
- Commenced identifying areas of risk and developing action plans for addressing modern slavery in our activities and supply chains where risks were identified.
- Started developing procedures to better understand the policies used by our direct suppliers to identify risks within their supply chains.
- Began developing training and awareness materials on forced labour and child labour.

To date, our approach to identifying modern slavery in the supply chain has focused primarily on the industry we operate in and the location of our activities, operations, employees, and third-party suppliers. An updated code of conduct and incremental procedures to understand our third-party supplier procedures are expected to be implemented in 2024.

Areas of Risk

Great Western Brewing Company's operations are concentrated in Western Canada. It is in this jurisdiction that most of our procurement occurs. Great Western considers this is a low-risk jurisdiction based on the limited number of modern slavery incidents identified by the U.S. Department of Labour - List of Goods produced by child labour or forced labour, as of September 28, 2022.

Great Western Brewing Company does however use North American based third-party agencies to help source and procure promotional sales materials produced in regions considered higher risk areas of the world based

on the same U.S. department of Labour reporting. In addition to relying on our third-party vendors Great Western has relied on our values, policies, and activities noted above to mitigate risk.

Remediation Measures and Remediation of Lost Income

Great Western's assessment of its business and supply chains for the risk of modern slavery in 2023 did not identify any incidents of child labour or forced labour. As a result, no steps were required to remediate the presence of modern slavery, or the loss of income associated with remediation efforts.

Training Provided to Employees


In 2023 Great Western Brewing Company did not require formal training on modern slavery for its employees. However, going forward our employee code of conduct will be updated to include education for employees regarding modern slavery issues and preventive measures, as applicable. The updated code of conduct and corresponding education is expected to commence in 2024.

Assessing Effectiveness

Great Western acknowledges that modern slavery is a possible risk in our supply chain. Though that risk is considered low given our geographical location and the nature of the industry. To reduce and prevent the risk of forced labour and child labour in our supply chain Great Western will continuously review our values, code of conduct, policies, and procedures to determine whether any improvements are required to reinforce our commitment to preventing modern slavery from taking place in our supply chain.

Approval and Attestation

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 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.



I have authority to bind Great Western Brewing Company Limited
Michael Brennan
Director, President and Chief Executive Officer
May 1, 2024