

**REPORT ON MODERN SLAVERY**

**FOR THE YEAR ENDED DECEMBER 29, 2024**



**Approved by the Board of Directors on May 5, 2025**

**Recipe Unlimited Corporation  
199 Four Valley Drive  
Vaughan, Ontario, Canada L4K 0B8**

## **1. REPORTING REQUIREMENT**

This Report on Modern Slavery (the “Report”) is being prepared by Recipe Unlimited Corporation (“Recipe”, “we”, “our”) in compliance with its reporting requirements under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

## **2. CORPORATE STRUCTURE, ACTIVITIES & SUPPLY CHAIN**

Recipe was founded by the Phelan family in 1883 as the Canada Railway News Company Limited, and was incorporated as Cara Operations Limited in 1961. On May 11, 2018, Recipe changed its name from Cara Operations Limited to Recipe Unlimited Corporation. Recipe is a private company incorporated under the Ontario Business Corporation Act, with its registered and head office located at 199 Four Valley Drive, Vaughan, Ontario L4K 0B8.

This joint report will address the operations of Recipe as well as those of its subsidiaries which are subject to the reporting obligations under the Act, being Groupe St-Hubert Ltee, Original Joe’s Franchise Group Inc., and Keg Restaurants Ltd for the fiscal year ending December 29th, 2024 (“FY2024”).

Recipe is a multi-branded restaurant, catering, and food manufacturing company that franchises and operates a number of restaurant brands. The core of Recipe’s business is centered around the franchising of restaurants, with operations overseen by our franchisees. As of the end of FY2024, Recipe’s network encompassed 1,204 locations across Canada and the United States.

The second largest segment of Recipe’s operations is the manufacturing and distribution of Recipe-branded food products, alongside other private label brands. These products are sold to consumers through both retail locations and our restaurants. These manufacturing activities are conducted by one of our subsidiaries, Groupe St-Hubert Ltée, at a production facility located in Montréal, Canada. Over 99% of our direct suppliers are based in either Canada (89.5%) or the United States (9.8%). In cases where direct suppliers procure ingredients from third-party sources, the vast majority of these second-tier suppliers are likewise located in Canada or the United States, with fewer than 20% situated outside these two countries

## **3. POLICIES AND PROCESSES RELATING TO FORCED AND CHILD LABOUR**

This Report and Recipe’s Modern Slavery Policy and Partner Code of Conduct (each described in greater detail below), are consistent with Recipe’s Core Values, and specifically the value of Doing the Right Thing.

In 2023, Recipe issued a Partner Code of Conduct to over 350 suppliers, outlining our expectations and standards with respect to Trade Practices, Labour & Working Conditions, Ethics, Compliance, and CSR (the “Partner Code of Conduct”). The Partner Code of Conduct was introduced to clearly outline our standards to our partners, and ensure that our partners adhere

to those same standards. It highlights Recipe's commitment to avoiding any form of child labour, forced labour, modern slavery or human trafficking within our operations or supply chains.

We interact with our partners regularly to ensure that they are in compliance with the Act, and focus on partnering with suppliers who have their own anti-forced/child labour policies in place. Any potential breaches of the Act are brought to the offending partner's attention and if such breaches are not immediately remediated, Recipe ceases to make purchases from the partner and seeks alternative sources of products from other reliable and sophisticated suppliers.

In 2024, we also prepared a Modern Slavery Policy (the "Policy"). This Policy provides concrete internal guidance regarding compliance with relevant child labour and forced labour legislation, and applies to all directors, officers, and employees of Recipe and of each of its subsidiaries. This Policy strictly prohibits any form of modern slavery in our operations or supply chains, and is updated annually to account for changes to relevant legislation and new risk factors impacting our operations or supply chains

#### **4. AREAS OF RISK AND REMEDIATION MEASURES**

In our review of Recipe's various supply chains, we have determined that the primary areas that carry a risk of potential forced labour or child labour being used relate to tier two and tier three suppliers, particularly those located in remote regions where it is more challenging to obtain clear visibility into their practices and operational processes. As we do not normally have direct contact with such suppliers, we work closely with our distributors and brokers who do and who understand the standard by which we expect all of our suppliers to conduct themselves. We do not tolerate the breach of any international or national laws against the use of forced or child labour, and we will not hesitate to terminate a business relationship with any supplier who fails to comply with the Partner Code of Conduct.

#### **5. REMEDIATION OF LOSS OF INCOME**

Recipe recognizes that efforts to prevent and reduce the risk of forced labour and child labour can have unintended consequences and contribute to a loss of income for vulnerable families. However, Recipe is not aware of any instances where its remediation efforts have resulted in, or contributed to, any loss of income for vulnerable persons.

#### **6. TRAINING**

In 2024, Recipe did not conduct formal training on modern slavery issues and preventative measures. However, Recipe's Modern Slavery Policy clearly sets out the expectation that all employees abide by child labour and forced labour laws, and establishes a channel for individuals to bring forward any concerns without fear of reprisal.

## **7. HOW WE ASSESS EFFECTIVENESS**

As stated in this Report, Recipe regularly meets with its suppliers, distributors, and brokers to ensure that our partners' business practices reflect our commitment to effectively reducing the risk of modern slavery in our business and supply chains.

**This Report was approved by the board of directors of Recipe pursuant to section 11(4)(a) of the Act.**

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 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.

Full name: Frank Hennessey

Title: Director and Chief Executive Officer

Date:           May 5          , 2025

          Frank Hennessey          

I have the authority to bind Recipe Unlimited Corporation