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ANNUAL REPORT

B-S211 - An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report is prepared in accordance with the Annual Report requirements set out in Section (11) in Bill S-211 - An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Year ended December 31, 2025



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May 18, 2026

The Honourable Gary Anandasangaree, M.P.
Minister of Public Safety
Public Safety Canada
Government of Canada
Ottawa, ON
K1A 0P3

Letter of Attestation for Bill S-211 *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Dear Minister Anandasangaree:

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 Ocean Choice International (Business Number: 851568618) and its subsidiaries listed below:

Name	Business Number
Katsheshuk Fisheries Inc.	899808117
Ocean Choice Holdings Inc.	864365796
55104 Newfoundland & Labrador Inc.	825224769

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 prior fiscal year (2025).

I declare that the above statements are true and accurate to the best of my knowledge, information, and belief. I have the authority to bind Ocean Choice International.

Respectfully submitted,

OCEAN CHOICE INTERNATIONAL

Martin Sullivan
Chief Executive Officer

Blaine Sullivan
President

Report on Forced Labour and Child Labour in Supply Chains Annual Report year ended December 31, 2025

This report is prepared in accordance with the Annual Report requirements set out in Section (11) in *Bill S-211 - An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

1. Annual Report

Ocean Choice International (OCI) has a commitment to maintaining the integrity of our Company. The manner in which we as an organization go about conducting business and how we treat others in our work, both here at home and around the globe, defines how the Company is viewed within our community and to the rest of the world. It is important for everyone involved with the Company – from our employees, our customers, and our suppliers, as well as the community in which we operate – that OCI be known for its high standards of business conduct and the integrity of its employees.

Throughout the year ended December 2025, OCI continued its efforts to prevent and reduce the risk of forced and child labour in its supply chain by implementing proactive measures and strengthening oversight to uphold ethical labour practices. The following

- OCI collaborated with an independent third-party group to assist in collecting environmental, social, and governance (ESG) data from its suppliers. As part of this effort, OCI distributes an annual Supply Chain Questionnaire to all its suppliers, which includes a direct question on child and/or forced labour. Additionally, an attestation form was sent to a select sample of OCI's supply chain providers for completion, reinforcing its commitment to ethical labour practices.
- Throughout the year, OCI modified its policies to strengthen its commitment to ethical conduct. These policies are reviewed on an annual basis to ensure alignment with evolving standards and best practices.
- OCI engaged a representative sample of suppliers, requesting formal attestations confirming that they do not engage in or permit forced or child labour within their operations or supply chains.
- OCI enhanced its policies on Child and Forced Labour, conducting a thorough review and updating key policies to align with new requirements under the Act. To achieve this, Ocean Choice has implemented comprehensive policies that enforce strict labour standards, ensuring compliance with international regulations such as the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO), and Canadian labour regulations.

- OCI has integrated comprehensive training on child and forced labour into its onboarding process for all employees, ensuring awareness and compliance from the start. Additionally, all processing facilities participate in annual orientation sessions focused on these critical labour issues. To reinforce accountability, a sign-off form is required to confirm completion of the training.

2. Single or Joint Report

This report is prepared by Ocean Choice International and for its various subsidiaries and operations including:

- Katsheshuk Fisheries Inc.
- Ocean Choice Holdings Inc.
- 55104 Newfoundland & Labrador Inc.

3. Supplementary Information

OCI provides the following response to the various categories for supplementary information related to the *Act*.

(a) Structure, Activities and Supply Chain

Ocean Choice is a family-owned and operated Newfoundland and Labrador seafood company. The company employs approximately 1,400 people from over 300 communities throughout the province. Ocean Choice operates fish processing plants and offshore fishing vessels, and it sources seafood from over 1,700 independent fish harvesters from across Newfoundland and Labrador. Ocean Choice has a strong global presence, with international sales offices around the world. For further information about the company, visit: www.oceanchoice.com

(b) Policies and Due Diligence Process in Relation to Bill S-211

OCI remains committed to upholding ethical labor standards and ensuring its supply chain remains free from forced and child labor. As part of this ongoing commitment, OCI has established comprehensive policies and a rigorous due diligence process designed to identify, prevent, and mitigate these risks. Through proactive measures, continuous monitoring, and collaboration with industry partners, OCI strives to uphold human rights, promote fair labor practices, and foster transparency across its operations. Throughout the 2025 reporting period, OCI implemented a series of measures aimed at preventing and minimizing the risk of forced and child labour within its supply chain.

- OCI's internal committee continues to oversee compliance with Bill S-211, *Fighting Against Forced Labour and Child Labour in Supply Chains*. The

committee remains focused on reviewing the *Act* and ensuring OCI's adherence to its requirements, reinforcing our commitment to ethical labour practices.

- OCI proactively gathers environmental, social, and governance (ESG) data from its suppliers by distributing a questionnaire to all supply chain partners. This questionnaire assesses each company's performance against OCI's Code of Business Conduct, covering key areas such as (i) business ethics, (ii) worker protection, (iii) child and forced labour, (iv) environmental responsibility, and (v) sustainability and social responsibility.
- OCI's response from our Supply Chain Questionnaire resulted in suppliers providing confirmation and verification that they do not engage in, or permit forced or child labour within their operations or supply chains. Additionally, suppliers committed to conducting thorough due diligence to assess and mitigate risks related to forced and child labour. This year, as an additional measure, OCI also required select suppliers to complete an attestation, further reinforcing our commitment to human rights, ethical business conduct, and sustainable supply chain practices.
- OCI's Supplier Code of Conduct establishes clear expectations for ethical labor practices, prohibiting forced labor in all forms and requiring suppliers to uphold human rights, fair working conditions, and compliance with international labor standards.
- OCI's corporate policies and procedures serve as a vital framework to guide employees in achieving excellence across all operations. Upholding human rights remains central to the success of OCI, its subsidiaries, and the communities in which we operate. Throughout the year, OCI's Code of Conduct remained in effect, reinforcing our ongoing commitment to ethical business practices.
- OCI has a landing page on its corporate website dedicated to compliance of *Bill S-211 - An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

(c) Parts of business and supply chain that carry a risk of Forced and/or Child Labour and steps taken to assess and manage risk

OCI's internal review of its supply chain has not identified any concerns with its current suppliers.

As part of its commitment to responsible business practices, OCI has a environmental, social, and governance (ESG) standards which focus on reducing environmental impact through sustainable practices, promote social responsibility by ensure fair treatment, safety and inclusion, as well as uphold strong governance through ethical leadership, transparency and accountability. The ESG includes a section on forced and child labour to ensure ethical compliance.

Additionally, OCI maintains robust policies that support confidential reporting of any concerns, including those related to forced and child labour. These policies include the Whistleblower Policy, Supplier Code of Conduct, and Ethics and Business Practices, reinforcing OCI's dedication to transparency and accountability.

(d) Measures taken to remediate any forced and/or child labour

OCI has not identified any forced and/or child labour within our operations or our supply chain.

OCI will continue to strengthen its policies, monitoring efforts, and supplier engagement to uphold ethical business conduct and foster a socially responsible supply chain.

(e) Measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of child and/or forced labour in supply chain

As previously noted, OCI has not identified any forced and/or child labour within our operations or our supply chain.

(f) Training provided to employees

OCI is dedicated to ensuring employees receive comprehensive training on ethical labour practices. Committee members have actively participated in third-party training and information sessions on the *Act* to strengthen their understanding and compliance.

Furthermore, OCI has implemented a mandatory corporate-wide training module, requiring all employees to complete the Supply Chain – Child & Forced Labour Policy training. Additionally, OCI has incorporated a dedicated component on child and forced labour into its orientation and onboarding programs, requiring sign-off on completion, reinforcing their commitment to ethical labour practices from the outset.

(g) Assessment of effectiveness in ensuring forced and/or child labour are not used in supply chain

OCI remains committed to ensuring that forced and child labour are not present within its supply chain through robust assessment measures and continuous monitoring. To date, OCI has not identified any issues related to child or forced labour within its operations or supply chain.

To uphold this commitment, OCI will continue its due diligent efforts through annual supply chain reviews, incorporating the following key measures:

Policy Review & Strengthening Compliance

- Regular assessments of workplace conduct policies, including anti-discrimination and anti-harassment provisions.
- Ongoing evaluation and reinforcement of compliance with child labour and forced labour regulations.
- Implementation of stringent controls, policies, and procedures to proactively detect and eliminate any risks of child or forced labour.

Supplier Engagement & Verification

- Thorough vetting of existing suppliers to ensure alignment with ethical labour practices.
- Distribution of attestation forms to suppliers, requiring formal confirmation that they do not engage in, or permit forced or child labour within their operations or supply chains.
- Active participation in independent third-party auditing programs such as FISH (Fairness, Integrity, Safety, and Health), Marine Stewardship Council (MSC), SMS/ISM Safety Management System and International Safety Management, Canadian Document of Compliance (CDOC), British Retail Consortium (BRC) and Canadian Safety Management Certificate (CSMC), Global Food Safety Initiative (GFSI), Sedex Members Ethical Trade Audit (SMETA), Customs-Trade Partnership Against Terrorism (CTPAT) and annual audits by Canadian Food Inspection Agency (CFIA)

Training & Education

- Comprehensive training programs for employees on ethical labour standards, including forced and child labour policies.
- Mandatory onboarding training for all new employees, incorporating a signed acknowledgment confirming their understanding of labour policies.
- Annual refresher training for processing facilities, reinforcing compliance and awareness as part of the orientation sessions.

Supply Chain Mapping & Risk Mitigation

- Identification of potential forced and child labour risks.
- Attestation from Suppliers on forced and child labour practices
- Gradual refinement of processes to enhance supply chain integrity.
- Ongoing engagement with third-party auditors and certification organizations to validate compliance.

Transparency & Monitoring

- Screening of suppliers during onboarding to ensure adherence to ethical labour practices.
- Promotion of transparency and accountability across OCI's supply chain through supplier contract reviews, annual questionnaire reporting, attestations, and compliance with third-party independent audits.



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OCI remains steadfast in its commitment to ethical labour practices, continually refining its assessment methods and reinforcing supplier compliance to mitigate risks and uphold international labour standards.

Respectfully submitted.

OCEAN CHOICE INTERNATIONAL INC.