



# **Forced Labour in Canadian Supply Chains ~ Compliance Report ~**

**Fiscal Year JL 2022 - JN 2023**

## 1. Introduction

In compliance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), which requires that subject organizations prevent and reduce forced labour and child labour within their supply chains, this report has been prepared for the single business entity DOM International Limited (“DOM”) for the period of July 1, 2022 - June 30, 2023.

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

In 2023, DOM revised its labour policy and introduced an anti-human trafficking policy to better call attention to and reduce the risk of child labour and forced labour.

We also increased the scope and number of our supply chain partners who are required to attest to using fair labour practices in their operations. Fair labour is not limited to child labour and forced labour; it encompasses

- Wages
- Payment practices
- Hours of work
- Health and safety
- Workers’ accident insurance coverage
- Freedom of association and the right to collective bargaining

### **3. Business Structure & Activities**

Located in Toronto, DOM is a privately held corporation. We are a food import and logistics wholesale SME specializing in seafood, particularly salmon, organic salmon, and value-added salmon. Established in 1988, we remain committed to bringing the world's finest seafood to Canadians. Our customer base comprises retailers, distributors, and food service establishments.

Our facilities include a federally inspected seafood processing operation and a 40,000 square foot warehouse and cold-storage facility where we conduct processing, warehousing, and distribution activities for ourselves and other companies. DOM has rigorous food safety protocols and operates under a number of food quality certifications and regulations, including QMP/QMPi, BRC, MSC/ASC, Organic, and Kosher.

As importers, we sustainably source our products from around the globe, in particular Norway, Scotland, and France, distributing four (4) brands across Canada and into some U.S. markets:

- Norwegian Fjord
- DOM Organics
- DOM Reserve
- DOM Specialty

### **4. Company Policies and Due Diligence Processes Related to Child Labour and Forced Labour**

#### **Labour Policy**

DOM's Labour policy codifies the company's commitment to ensuring all employees, whether direct hire or temporary, are legally able to work in our

jurisdiction and receive the compensation to which they are entitled. The policy further states that our labour suppliers must conduct their businesses in a similar fashion.

Processes are in place to verify the employee's or temporary worker's age, identity, and ability to legally work in Canada. Those in Canada on work or student permits must produce original work documents for verification. Such documents must remain valid, with status and renewal actively monitored. Any compliance issues identified are flagged for resolution.

### **Anti-Human Trafficking Policy**

Our Anti-Human Trafficking policy prohibits the engagement in any business or transaction that relates to or may relate to human trafficking-associated activities.

Stakeholders must report to DOM any concerns related to either policy. Violation or failure to report violations or illegal behaviour may subject employees to disciplinary and/or legal action. Non-compliance supply chain partners will similarly face business and/or legal actions. Retaliation or threat of retaliation is not tolerated in any way and perpetrators will be disciplined.

DOM also continues to comply with many customer codes of conduct, requiring that we complete surveys and pass rigorous audits. These codes of conduct are built on international labour standards forbidding engagement in child labour or forced labour, such as the

- Ten Principles of the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- ILO conventions and recommendations

## **5. Identifying Forced Labour and Child Labour**

While DOM has not conducted our own risk mapping process, in complying with our customer codes of conduct, we have completed audit surveys that required our own suppliers and their suppliers to report on the use of child labour and forced labour. No organizations were flagged as part of those audits.

As a seafood importer, DOM is keenly aware that there is a risk of unfair labour practices when sourcing product within this industry or from certain countries. We are currently exploring options for how to best evaluate, audit, and monitor our supply chain partners.

We have identified particular areas of focus

- tier three suppliers
- the use of outsourced, contracted, or subcontracted labour
- suppliers closer to primary sourcing activities (e.g., fishing vessels)
- suppliers operating in countries with less stringent labour standards than Canada or the EU

## **6. Remediating the Effects of the Measures to Eliminate Child Labour and Forced Labour**

At this time, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of child labour or forced labour in our activities and supply chains.

## **7. Training Employees on Child Labour and Forced Labour**

Department managers and supervisors are trained on the Labour policy requirements to verify the age of temporary help agency workers when they are first assigned to DOM, using the worker's government-issued photo ID. All employees receive the Anti Human-Trafficking policy, so they are aware of the issue and their related responsibilities.

## **8. Assessing Effectiveness**

DOM recognizes the importance of preventing forced labour and child labour and that all parties play a role in doing so. We do not currently have a process to assess the effectiveness of our actions in this space and are investigating resources available to do so.

## 9. Approval and Attestation

This report is approved by the owners of DOM International Limited

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.”

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Domenic Porporo

President

May 23, 2024

I have the authority to bind DOM International Limited

*“Mario Porporo ”*

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Mario Porporo

Vice-President, Operations & Logistics

May 23, 2024

I have the authority to bind DOM International Limited