



GROWMARK

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(Chatham, Ontario, CA)
Great Lakes Grain FS
835 Park Ave. W.
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Modern Slavery Statement for the Fiscal Year September 1, 2025 ending August 31, 2026.

This statement is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act by GROWMARK, Inc. ("GROWMARK") outlining the approach and initiatives of GROWMARK to identify and address the risks of forced labour and child labour in its business operations and supply chains during the fiscal year commencing September 1, 2025, and ending August 31, 2026.

GROWMARK is committed to respecting human rights and working towards ensuring our supply chain is free from forced labour and child labour.

Company Structure

GROWMARK is an agricultural cooperative serving almost 400,000 customers across North America, providing agronomy, energy, facility engineering and construction services, logistics services, and grain marketing and risk management services. The sectors in which GROWMARK operates include agriculture, wholesale trade, retail trade, transportation and warehousing, finance and insurance, and the provision of professional, scientific, and technical services. GROWMARK operates with a farmer board of 19 directors, 2 of those directors elected from Ontario. GROWMARK is a US-based company, incorporated in the state of Delaware, with headquarters in Bloomington, Illinois, USA. The Canadian headquarters are located in Guelph and Chatham, Ontario, CA.

GROWMARK's Canadian operation encompasses the sale of crop inputs, custom crop applications, livestock feed, and the sale of fuel and propane within the division of Central Ontario FS. GROWMARK also provides grain storage and marketing services in Canada through the partnership of Great Lakes Grain. The four product divisions, Agronomy, Grain, Feed, and Energy/Propane also source products for the cooperative member owners, retail division and business interests in Ontario, Canada including AGRIS Co-operative Ltd., Co-operative Regionale de Nipissing Sudbury Ltd., County Farm Centre Ltd., Durham Farmers' County Co-operative, Central Ontario FS, La Co-operative Agricole d'Embrun Limitee, Lucknow District Co-operative Inc., Midwest Co-operative Services Inc., Sunderland Co-operative Inc., Thunder Bay Co-operative Farm Supplies, Vineland Growers Co-operative Ltd., and Wanstead Farmers' Co-operative Company Limited.

Supply Chain

Our supply chain encompasses many products purchased from Canada and other countries.

Agronomy, grain, animal feed, and energy products are sourced through manufacturers and distributors that specialize in the products needed by our member owners and customers.



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Risks in Supply Chain

Our company is committed to respecting human rights and will continue to work towards ensuring that forced labour and child labour is not a part of any product within our supply chain.

Over this past year we have continued to work with our supply chain to follow up on our 2025 survey efforts on risk identification, processes to identify and address any issues which might arise as well as their overall efforts the prevention of forced and child labour. We have had excellent interactions in these conversations and feedback from our suppliers, and we are looking forward to continuing these conversations and reinforcements on no less than an annual basis for mutual respect of human rights we see displayed from our suppliers. Given the location and nature of our operations, we have not historically identified risks of forced or child labour as a material risk in our activities or in our supply chains, but we are continuing these discussions with suppliers to ensure our operations continue to promote our commitment to respecting human rights.

Actions Taken

GROWMARK has been, and continues to be, committed to due diligence policies and process through its Code of Conduct and complying with all applicable laws relating to forced and child labour in the jurisdictions in the US and Canada in which GROWMARK operates. GROWMARK's Compliance Program and Code of Conduct reaffirms GROWMARK's policy of conducting its business both legally and ethically. The Code of Conduct standards apply to all GROWMARK's businesses and include the expectation that those acting on its behalf will comply with the law, which includes forced and child labour laws.

It is a condition of employment that all GROWMARK employees must be familiar with and comply with the Compliance Program and Code of Conduct in the discharge of their duties. Employees also are required to execute an acknowledgement of compliance annually.

In 2025 we developed and conducted an internal assessment of our practices and our supplier's practices to identify and address any risks or evidence, if found, of forced labour and/or child labour in our activities and supply chains. For 2026 we continued these discussions and monitored the processes and practices. We are continuing to be committed to identifying, addressing, and prohibiting the use of forced labour and/or child labour in its activities and supply chains. We continue to distribute this report annually to all GROWMARK management, employees and on GROWMARK's public website.

GROWMARK has developed policies and procedures this past year that will enable us to monitor our suppliers and enact measures requiring our suppliers to have in place policy and procedures for



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identifying and prohibiting the use of forced labour and/or child labour in their activities and their supply chains.

Risk Assessment

As was stated earlier in this report in 2025 communicated and gathered information from our suppliers to confirm that they do not distribute goods and services that support or condone child labour or forced labour in Canadian or international supply chains. We continued these efforts for 2026 with our supply chain vendors including holding annual conversations reinforcing our expectations of their commitment to compliance.

GROWMARK continued its work with partners in the industry to develop steps going forward to identify risks within its supply chain.

GROWMARK continues to communicate our policy and procedures for its management and employees to learn about, identify and follow GROWMARK's policy on the use of forced labour and/or child labour in its supply chains. Mandatory online training was provided to employees across the GROWMARK organization to ensure they were informed and prepared for spotting and reporting any activity they found suspicious of any forced labour and/or child labour.

Remediation

GROWMARK recognizes the responsibility that we share with our suppliers to remedy and guard against forced and child labour. Successful remediation is not easy to achieve and requires a victim-led, consultative, and multi-stakeholder approach. We have created an approach based upon the following principles:

1. Definition of a complaint. A complaint is a report of a violation that has occurred in GROWMARK's supply chain and internal business and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.
2. Development of a remediation procedure. GROWMARK recognizes that it is important to identify and establish a remediation team if complaints arise and alleged issues are surfaced. We have developed a process outlining representatives from the workforce, managers, and organizations with expertise in forced and child labour will be where available. This document provides direction and a plan if forced or child labour is identified, in any of our business dealings, to engage existing government organizations, processes or projects providing remedy for victims of forced and child labour, and will engage with said organizations, processes and projects identified to involve them in the development of the remediation procedures. Protecting the victim of forced and child



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labour must be the priority of the remediation procedure. The remediation team will seek to understand the specific needs, circumstances, and aspirations of each victim and what it was that pushed them into forced or child labour.

3. Dealing with a case of forced labour and/or child labour. Conduct an initial assessment of the allegations to ensure there is sufficient information to understand the exploitation discovered and remedy it. Ascertain if a supplier or labour provider is implicated. Report the allegations to relevant authorities.
4. Ongoing support and monitoring. Evaluating how effective the remediation procedure was and amending it accordingly. Reviewing internal policies and procedures to determine what needs to change to prevent forced and child labour from re-occurring.

Training

GROWMARK has a long history of annual, mandatory compliance training for all employees to support our Code of Conduct. Anti Forced and Child labour training is now an annual expectation to reinforce our employee policies including training of how to spot and what to do if forced labour and/or child labour is identified.

GROWMARK is committed to a review of this training policy as well as on-going compliance sessions and awareness campaigns.

Effectiveness Assessment

Every 3 years our overall compliance efforts are evaluated through an online survey to all-employee which assesses awareness, usage, comfort level and training received on various compliance efforts. This past year we conducted this survey on all aspects of compliance including Anti Forced and Child Labour awareness and effectiveness. With an overall response rate of 44% We were very encouraged by the feedback with 99% of our employees having awareness of our compliance program and 91% recalling their participating in the training received on compliance. The highest individual score on the survey was 4.2 out of 5 of employees stating that the Compliance training they receive is valuable to employees in understanding the compliance program and our Code of Conduct. We continue to conduct this survey every 3 years to ensure we are reaching our employees and monitoring our effectiveness in reaching, communicating and training our employees on compliance issues including Anti Forced and Child Labour awareness.

Additionally, we continue to monitor activities and discuss the importance of to our policies with suppliers as well as follow up on the questionnaires and investigations/audits of any suppliers through our survey efforts.



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Attestation.

This report will be presented to the GROWMARK's board of directors on June 18, 2026 for approval pursuant to Section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Signed,

Brad Drake
Chief Operating Officer,
GROWMARK, Inc.
Authorized Signatory