

2023 Report on

Forced Labour and Child Labour

As per Obligations to the

Fighting Against Forced Labour and Child
Labour in Supply Chains Act

BioNeutra Global Corporation

Submitted
May 2024

1. Identifying Information

Legal Name	BioNeutra Global Corporation
Financial Reporting Year	2023
Revised Report	No
Business Number	893380196
Joint Report	BioNeutra North America Inc. (business number 853077444)
Reporting Obligations in other Jurisdictions	None
Entity Categorization	Public Company listed on the TSXV
Sector / Industry	AgriFood
Location	Vancouver, BC

2. Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

BioNeutra Global Corporation (“BGC”, “BioNeutra” or the “Company”) only works with contract manufacturers that have stated policies where forced labour and child labour are forbidden. To the best of the Company’s knowledge, forced labour and child labour do not exist in the Company’s supply chain.

3. Information on the Activities of BioNeutra Global Corporation

a) **BGC’s structure, activities, and supply chains**

BioNeutra Global Corporation (BGC) is listed on the TSX Venture Exchange under the symbol BGA and has an office in Vancouver, BC. BioNeutra North America Inc. (BNA) is a 100% owned subsidiary of BGC and is in Edmonton, AB. As of March 1, 2024, BNA has 33 employees. BNA develops, manufactures, and sells a range of functional food ingredients derived from plant starch. These products are sold to food manufacturers around the world.

BNA has a research and development centre and pilot manufacturing facility in Edmonton, Alberta. In Canada, BNA purchases starch directly from North American starch manufacturers or from the open market. BNA purchases product from contract manufacturers in Asia. These contract manufacturers purchase bulk quantities of plant starch on the open market. Plant starch is converted into various products for BioNeutra.

b) Policies and due diligence processes in relation to forced labour and child labour

BioNeutra does not have a written policy or particular due diligence processes related to forced labour and child labour. However, the company only works with contract manufacturers and suppliers that can provide written proof that they do not use forced labour or child labour and the company, having exercised reasonable diligence, has no credible information to the contrary.

c) Business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

BioNeutra is aware of reports from various countries in Asia that some ethnic minorities and migrant workers may have been used as forced labour. The Company has asked for and obtained from any suppliers in these countries statements that they do not use forced labour or child labour in their facilities and that their supply chains also, to the best of their knowledge having exercised reasonable diligence, do not use forced labour or child labour.

d) Any measures taken to remediate any forced labour or child labour

BGC is not aware of any forced labour or child labour in its supply chain so has not taken any such measures.

e) Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

BGC is not aware of any forced labour or child labour in its supply chain so has not taken any such measures.

f) The training provided to employees on forced labour and child labour

BioNeutra does not currently provide training to its employees on forced labour or child labour.

g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

BioNeutra has taken no actions to assess our effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains except to the extent of having asked for and obtained from their suppliers as indicated above in Sections 3b and 3c that such

suppliers do not use forced labour or child labour and that their supply chains also, to the best of their knowledge having exercised reasonable diligence do not use forced or child labour.

4. Other Jurisdictions with Supply Chain Transparency Requirements where BGC or BNA Operate

a) United Kingdom

The United Kingdom passed the [Modern Slavery Act 2015](#) that requires transparency in supply chains. This applies to all commercial organizations that provide goods or services in the United Kingdom and have a total annual turnover of £36,000,000 (approx. CAD61.4M). BGC does not currently meet this threshold however the reporting requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act are very similar to the requirements of the United Kingdom Modern Slavery Act 2015.

b) Australia

Australia passed the [Modern Slavery Act 2018](#) that requires transparency in supply chains. This applies to all entities based in or operating in Australia and have a consolidated revenue of AUS100,000,000 (approx. CAD88M). BGC does not currently meet this threshold however the reporting requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act are similar to the requirements of Australia's Modern Slavery Act 2018.

c) California

California passed the [California Transparency in Supply Chains Act](#) in 2010. This applies to all retail sellers and manufacturers doing business in California and have a global total revenue exceeding US\$100M (approx. CAD137M). BGC does not currently meet this threshold.

d) European Union

i) [Corporate Sustainability Reporting Directive \(CSRD\)](#)

This directive modernizes and strengthens the rules concerning the social and environmental information that companies have to report. A broader set of large companies, as well as listed SMEs, will now be required to report on sustainability. Some non-EU companies will also have to report if they generate over €150 million on the EU market. BGC does not currently meet this threshold.

ii) The Corporate Sustainability Due Diligence Directive (CSDDD/CS3D)

This directive (together with the CSRD) is a proposed Directive in European Union law to require due diligence for companies to prevent adverse human rights and environmental impacts in the company's own operations and across their value chains. It is expected to be adopted in 2024 and then be adopted across the European Union by 2026. BGC would fit into Group 1 based on the type of business (food ingredients) but would not pass the €150M+ in worldwide revenue threshold at this time.

e) Germany

Germany passed the [Act on Corporate Due Diligence Obligations in Supply Chains](#) in 2021. This act only applies to companies with offices in Germany with at least 1,000 employees. BioNeutra does not have an office in Germany and is not required to conform to this act.

f) France

France passed the [Corporate Duty of Vigilance Law](#) in 2017 and it applies to French companies with 5,000 employees or to French-based subsidiaries with more than 10,000 employees. BioNeutra does not have an office in France and is not required to conform to this act.

g) Holland

The Netherlands passed the [Responsible and Sustainable International Business Conduct Law](#) in 2021 and updated in 2022. There are two parts of this law: General Duty of Care and Due Diligence Obligations. This law applies to all Dutch and EU companies conducting activities outside the Netherlands or non-EU companies conducting activities inside the Netherlands; the law only applies if two of the three following items apply:

- Balance sheet of at least €20 million;
- Net turnover of at least €40 million; and
- An average of 250 employees during the year (full-time, part-time, contract).

BioNeutra does not meet 2 of the 3 items above therefore is not required to conform to this act.

h) Switzerland

The Swiss [Code of Obligations Articles 964a et seq.](#) were passed in 2020. These laws cover:

- non-financial reporting obligation for environmental, social, labour, human rights and bribery matters

- only if it is a public company listed on the Swiss exchange, and
- has ≥500 full time employees, and
- Two consecutive years of:
 - A profit of more than CHF 20 million annual, or
 - A turnover of CHF 40 million per year.
- Due diligence and reporting obligations in the areas of conflict minerals and child labour. Both domestic and foreign companies operating in Switzerland must report if they meet two of the three following items:
 - A profit of more than CHF 20 million annually
 - Has ≥250 full time employees, and
 - A turnover of CHF 40 million per year.

BioNeutra does meet the conditions to report to the Swiss government.

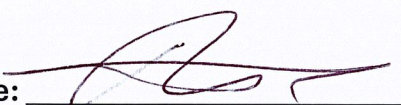
5. Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, 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.

Name: Robin Le Fevre

Title: Chairman of the Board of Directors, BioNeutra Global Corporation

Date: May 24, 2024

Signature: 

I have the authority to bind BioNeutra Global Corporation