



2024 Big Rock Brewery Inc. Modern Slavery Report

Big Rock Brewery Inc. ("we", "our", the "**Corporation**" or "**Big Rock**") has created this report to meet our requirements pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Modern Slavery Act**").

Forced labour and child labour (each as defined in the Modern Slavery Act and hereinafter together referred to as "**modern slavery**") are violations of fundamental human rights and are occurring across the globe. As a Canadian manufacturer providing beverages to Canadians, we recognize our responsibility to ensure our operations and the supply chains that support our operations adhere to the highest ethical standards, which includes no use of modern slavery in our business nor in our supply chains.

The Corporation is subject to the reporting requirements of the Modern Slavery Act. This report covers the Corporation's activities and the activities of our subsidiaries listed in **Appendix A** during our previous financial year being between December 31, 2023 through December 30, 2024.

The Corporation takes modern slavery and our reporting requirements very seriously and we are committed to ensuring that we adhere to such requirements. We plan to continue to evaluate and assess our processes with respect to modern slavery in our business over time to ensure we are meeting all applicable reporting requirements and other legislation relating to modern slavery.

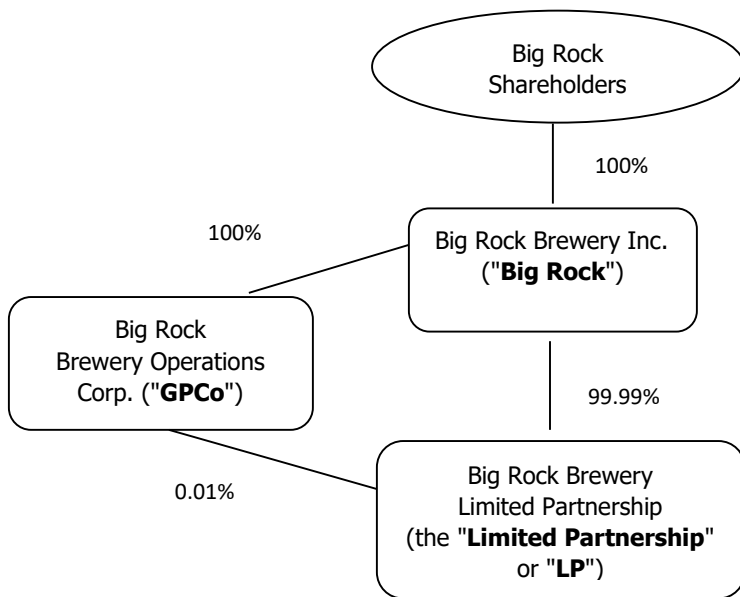
Steps Taken During 2024

The Corporation did not take any material steps during 2024 in relation to reducing the risks of modern slavery occurring in the Corporation's supply chain; however, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain.

Structure, Activities and Supply Chains

- **Structure:** Big Rock is a corporation governed by the Alberta *Business Corporation Act* ("**ABCA**") and was incorporated on November 15, 2010. The registered office is located at Suite 2400, 525 – 8th Avenue S.W., Calgary, Alberta T2P 1G1 and the head office is located at 5555 – 76th Avenue S.E., Calgary, Alberta T2C 4L8. Big Rock is a publicly-traded company listed on the Toronto Stock Exchange under the symbol "BR". All business activities are carried out by Big Rock Brewery Limited Partnership.

The following diagram describes the inter-corporate relationships among Big Rock and each of its material subsidiaries, as of the date hereof, as well as the percentage of votes attaching to the outstanding voting securities of each subsidiary:



The Limited Partnership is a limited partnership incorporated under, and governed by, the laws of the Province of Alberta. The Limited Partnership is the operating entity through which Big Rock conducts all of our business activities. Big Rock and GPCo, a wholly owned subsidiary of Big Rock which is also incorporated under the ABCA, are the only partners in the Limited Partnership.

At December 30, 2024, the LP had a total of 103 regular active full-time salaried employees, 2 regular active part-time employees, 8 casual hourly employees and 3 inactive employees on leave. The LP is managed by a senior leadership team comprised of the President and Chief Executive Officer, Chief Financial Officer, Vice President, Sales & Marketing, Vice President, Innovation, Business Development, and Government Relations, Director, Operations and Director of People & Culture. The President and Chief Executive Officer and the Chief Financial Officer are each officers of the Corporation and of each of our subsidiaries.

As of the date of this report, the Board of Directors of Big Rock consists of four (4) directors. All but one of the directors are considered "independent" as defined by National Instrument 58-101 – *Disclosure of Corporate Governance Practices*. Board members contribute guidance to the Corporation via committee participation including the Audit Committee, the Compensation and Human Resources Committee and the Corporate Governance Committee.

- **Operations:** The Corporation, via the Limited Partnership, produces premium, all-natural craft beers, ready-to-drink beverages, ciders, and other alcoholic and non-alcoholic beverages under its own brands and under "white label"/co-packing arrangements. As one of Canada's largest independently owned craft brewers, Big Rock has an extensive family of permanent ales and lagers, the Rock Creek series of craft ciders, the White Peaks family of hard tea beverages, a continually-changing selection of seasonal and limited-edition beers and other licensed alcoholic beverages.

Big Rock produces, markets and distributes our products primarily in Canada. The Corporation owns and operates a production facility in Alberta and has manufacturing licenses in British Columbia ("**BC**") and Ontario. Today, Big Rock's primary brewing, packaging and warehousing facility is in Calgary, Alberta and has been in operation since 1996.

- **Supply chains:** Big Rock currently has one main operating brewery which is located in Calgary, Alberta. Additionally, Big Rock had a packaging microbrewery located at Liberty Village in Toronto, Ontario which was closed after December 30, 2024.

At each facility, the Corporation's beers are batch-brewed in modern, stainless-steel brewhouses and fermented in fully enclosed stainless-steel tanks to ensure the most sterile conditions possible. The beer is kept chilled under pressure to retain its natural carbonation. After fermentation, the beer is cold filtered and stored in bright beer tanks ready for packaging.

The Corporation's supply chain involves several steps:

- **Raw Materials Procurement** – The only ingredients used in the Corporation's handcrafted ales and lagers are water, hops, yeast and various combinations of two-row malting barley, malted wheat, malted rye, and oats. Other natural ingredients are also used for certain products to provide unique innovative flavours. The Corporation uses select prairie-grown two-row malting barley, which provides a distinctive flavour to our beers. Choice hops are purchased through agents in Yakima, Washington, which is the centre of one of the largest hop-growing regions in the world. The Corporation also imports some rarer non-Canadian hops as part of our method of utilizing traditional practices and recipes in the creation of some of our offerings. Other ingredients are available through local sources in Alberta. The Corporation works closely with an orchardist located in Kelowna, BC to source ingredients for our family of authentic dry ciders.
- **Packaging** – The Corporation packages our beers in 30 litre ("**L**") vertical kegs, 58.6 L full-size kegs, 355 millilitre ("**ml**") standard aluminum cans, 355 ml sleek aluminium cans and 473 ml aluminum cans. The Corporation's can supplier is our largest vendor who supplies almost all of the cans used in production, due to the supplier's proximity to the Calgary brewery. The Corporation's can supplier is a Canadian company owned by a global supplier of rigid packaging products to consumer marketing companies, as well as transit and protective packaging products, equipment and services to a range of end markets. Its world headquarters is located in Tampa, Florida. The cans are either printed prior to delivery or labelled after production and then placed in cartons and wrapped for shipment and retail display.
- **Distribution:** Once Big Rock's beverages are brewed and packaged, they are distributed to wholesalers, retailers, public establishments or directly to consumers. This is done through multiple local and national transportation companies. Big Rock maintains distribution facilities in Calgary, and sales staff are resident in Alberta, BC, Saskatchewan, Manitoba, and Ontario.

The Corporation and our subsidiaries had a total of four hundred and seven (407) vendors who provided products and services during 2024. Of these vendors, fifteen (15) comprised 60% of the expenditures in respect of products and services purchased during the year. Of the total vendors, twenty-nine (29) are based outside of Canada (twenty-seven (27) in the United States, one (1) in the United Kingdom and one (1) in Mexico) including two (2) of the largest vendors noted above.

Additional information regarding the corporate structure and operations of the Corporation and our subsidiaries can be found in our Annual Information Form dated March 28, 2025, Management Information Circular dated April 10, 2025, annual financial statements and related management's discussion and analysis for the year ended December 30, 2024, which are posted on our website ([Craft Beer | Big Rock Brewery \(bigrockbeer.com\)](#)) and filed on SEDAR+ ([www.sedarplus.com](#)).

Policies and Due Diligence

Policies

The Corporation does not have any current policies in place specific to mitigating risks related to modern slavery. We do, however, have several policies in place that reflect our values and set clear expectations for our directors, officers, employees, suppliers, contractors, consultants, agents, business partners, and other service providers with whom we engage.

Below, we have provided an overview of the relevant policies that we currently have in place and govern the conduct of employees and stakeholders at Big Rock:

- **Code of Conduct Policy:** The Corporation's Board of Directors and Senior Management are responsible to our stakeholders to ensure the Corporation conducts business in a manner consistent with our vision and reputation for excellence, integrity, and passion. The Code of Conduct ("**Code**") applies to all Big Rock personnel (permanent, part-time, temporary and casual employees) in every jurisdiction in which the Corporation operates and also applies to select consultants and advisors; each are expected to abide by the Code when dealing with, or acting on behalf of, the Corporation. Pursuant to this Code, all Big Rock personnel are expected to conduct themselves with personal and professional integrity, ensuring their conduct is fair, legal, and does not give the appearance of impropriety. Adherence to the Code also requires each participant to conduct themselves in compliance with all applicable laws, rules and regulations. In the event of a breach of this Code, personnel are subject to disciplinary action(s) including termination of employment, appointment or contract.

The Code includes a whistleblower provision with a view to fostering an atmosphere of openness and trust in the workplace. If personnel become aware of actual or suspected breaches of the Code, including breaches of laws concerning modern slavery, they are encouraged to report such breaches, and in doing so, they are protected from adverse employment action and to any retaliation. Reports may be made directly to the Privacy, Conduct & Ethics Compliance Officer, or anonymously through a third-party independent whistleblower reporting mechanism. On a quarterly basis the Audit Committee of the Board of Directors receives and reviews any complaints received by the Privacy, Conduct & Ethics Compliance Officer and a report generated by the whistleblower facility.

- **Respect in the Workplace Policy:** This policy codifies Big Rock's commitment to building and preserving a safe work environment for all employees by ensuring the workplace is harassment free and all personnel feel safe and respected. Pursuant to this policy, any Big Rock employee who threatens, harasses, or abuses another employee, or any other individual at or from the workplace is subject to disciplinary action, up to and including termination of employment.

Due Diligence

Big Rock expects each of our directors, officers, employees, suppliers, contractors, consultants, agents, business partners and service providers and affiliates with whom we engage to adhere to ethical and lawful business practices.

The Corporation has not historically undertaken any material steps to conduct due diligence relating specifically to mitigating the risks of modern slavery occurring in relation to our business or operations. Notwithstanding this, given our reliance upon Canadian and US-based suppliers and consumption of products that are not typically associated with modern slavery, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain.

Activity and Supply Chain Risks

While we recognize that risks with respect to modern slavery exist across all industries and sectors, the Corporation is not aware of any high-risk exposure to modern slavery associated with the Corporation's business or supply chains.

Remediation Measures

The Corporation has not, to date, identified the existence of modern slavery in our business and the supply chains that support our operations and as such, we have not taken any measures to remediate any forced labour or child labour or to remediate the loss of income to the most vulnerable families that resulted from any measure taken from any of the Corporation's actions.

Employee Training

The Corporation has ensured that all employees are aware of the new reporting requirements under the Modern Slavery Act. In early 2024 Big Rock initiated communiques to each employee advising of the new modern slavery legislation along with an overview of the impact of modern slavery.

Assessment of Effectiveness

The Corporation has not yet implemented any policies or processes to specifically assess our effectiveness in ensuring that modern slavery is not used in the Corporation's business or supply chains.

Approval and Attestation of the Report

This report was approved by the Corporation's Board of Directors in respect of the Corporation and our subsidiaries listed in Appendix A on May 29, 2025 pursuant to paragraph 11(4)(b)(ii) of

the Modern Slavery Act and will be filed with the Minister of Public Safety and Emergency Preparedness.

In accordance with the requirements of the Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest, on behalf of the Corporation, and with no personal liability, that the information in this report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.

"Stephen Giblin"

Stephen Giblin
Chairman
May 29, 2025

I have the authority to bind the Corporation.

APPENDIX A

Subsidiaries of Big Rock Brewery Inc.:

Big Rock Operations Corp. – 100% owned by Big Rock Brewery Inc.

Big Rock Brewery Limited Partnership – 99.99% owned by Big Rock Brewery Inc. and 0.01% owned by Big Rock Operations Corp.