

**The Fighting Against Forced Labour and Child  
Labour in Supply Chains Act:  
Fiscal Year 2025 Report**

This report describes the activities and efforts of Blommer Chocolate Company, LLC in financial year 2025 to monitor and mitigate forced labour and child labour in our supply chain. This report is published in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act), covering the period April 1, 2025 – March 31, 2026, Blommer's 2025 financial year.

**A. Structure, activities and supply chains**

Blommer Chocolate Company, LLC (Blommer) is a U.S.-based cocoa processor and chocolate ingredient manufacturer founded in 1939. Blommer was acquired by Fuji Oil Holdings Inc. (Fuji Oil) in 2018 and operates as a consolidated subsidiary within Fuji Oil's global industrial chocolate business.

Blommer sells its chocolate and confectionery compounds to domestic and international customers of all sizes in sectors including confectionery, baking, and other food industries. Its core competencies include cocoa bean processing, chocolate manufacturing, commodity risk management, and product and process research and development.

As of fiscal year end 2025, Blommer had 736 employees worldwide, and Blommer's wholly owned subsidiary, Blommer Chocolate Company of Canada, Inc. (Blommer Canada), had 137 employees. Blommer also has 19 employees based in Côte d'Ivoire that are part of its Sustainability team, supporting either community development or field assurance, monitoring, and evaluation work in cocoa-growing regions.

Blommer Canada is responsible for the production of a range of confectionery compounds at its plant in Campbellford, Ontario. Blommer Canada sources its ingredients both domestically and from foreign suppliers, including from Blommer in the U.S. Blommer sells its products manufactured in Canada domestically in Canada as well as to customers in the U.S.

Engaged in sustainability initiatives globally, one of Blommer's key priorities is to support responsible cocoa production. Blommer is a founding member and board member of the World Cocoa Foundation (WCF), an industry association focused on strengthening sustainability in the cocoa sector, including initiatives to prevent and remediate risks of forced labour and child labour in cocoa supply chains. Blommer is also a founding member of the Cocoa & Forests Initiative (CFI), a global partnership committed to eliminating deforestation in cocoa supply chains and improving farmer livelihoods. Finally, Blommer operates proprietary sustainability programs in Côte d'Ivoire, the world's top cocoa producer, designed to support farmers and safeguard social objectives such as advancing access to primary education.

Blommer became a member of the Roundtable on Sustainable Palm Oil (RSPO) in 2013 and is a founding member of the North America Sustainable Palm Oil Network (NASPON).

As one of the first companies to commit to a sustainable sourcing plan for palm oil, Blommer has been sourcing 100% of its palm oil RSPO-certified since 2014.

Globally, Blommer offers a range of cocoa, chocolate, and confectionery compound products, including certain offerings made with sustainable ingredients sourced under certifications such as Rainforest Alliance or Fairtrade as well as under its own sustainability program, Sustainable Origins.

## **B. Policies and due diligence processes**

Blommer continues to enhance its policies and due diligence processes to identify and mitigate risks of forced labour and child labour in its operations and supply chains.

### **1. Supplier Code of Conduct**

#### **1.1 Supplier requirements**

Blommer has adopted a Supplier Code of Conduct applicable to its raw material, ingredient, and other suppliers. Blommer has communicated the Supplier Code of Conduct to its cocoa suppliers, which represent a priority focus area based on the child labour risk profile of cocoa sourcing, and is in the process of formalizing a requirement for all suppliers to provide signed acknowledgements confirming their understanding of and commitment to comply with its provisions.

The Supplier Code of Conduct prohibits all forms of forced labour and child labour and establishes expectations aligned with internationally recognized standards. It requires suppliers to:

- Ensure that all work is voluntary and that workers have freedom of movement;
- Prohibit coercion, debt bondage, retention of identity documents, and the charging of recruitment or employment-related fees;
- Clearly communicate the terms and conditions of employment in a manner understandable to workers; and
- Maintain and declare policies prohibiting forced labour.

With respect to child labour, the Supplier Code of Conduct:

- Prohibits the employment of children under the age of 15 or under the age of completing compulsory education, or otherwise under the minimum age of employment in the country;
- Prohibits hazardous and night work for individuals under the age of 18;
- Requires respect for children's rights to education, health, and development; and
- Requires suppliers to identify, prevent, and mitigate risks of child labour within their operations and supply chains.

These requirements are aligned with internationally recognized standards including those of the International Labour Organization (ILO) Convention No. 29 (Forced Labour), ILO Convention No. 138 (Minimum Age), ILO Convention No. 182 (Worst Forms of Child Labour), and The United Nations Guiding Principles on Business and Human Rights.

## **1.2 Due diligence processes**

Blommer continues to develop risk-based due diligence processes to assess and monitor supplier compliance with its policies.

In mid-2025, Blommer introduced a Know Your Supplier (KYS) questionnaire that was issued to all cocoa suppliers. The KYS questionnaire seeks to collect detailed information on ownership structure, organizational and operational profile, cocoa sourcing and traceability practices, certifications and compliance with labour laws and sustainability standards, logistics capabilities, and financial health.

In early 2026, Blommer issued a Human Rights Survey to its cocoa suppliers, which builds on and complements the KYS questionnaire. The survey is designed to assess supplier performance across key risk areas, including governance and human rights policies; farmer mapping and supply chain traceability; labour conditions and controls addressing forced labour and child labour; grievance mechanisms; environmental practices (including deforestation monitoring); certifications, e.g., Rainforest Alliance and Fairtrade; and capacity for continuous improvement. The Human Rights Survey is designed to align with international standards and initiatives, including principles of the ILO and the International Cocoa Initiative (ICI), and suppliers are required to provide supporting documentation to substantiate their responses.

The KYS questionnaire is intended to support and is increasingly informing the company's ability to identify and assess potential risks related to forced labour and child labour.

## **1.3 Ongoing development**

Blommer is in the process of developing a more structured methodology to assess and respond to the information gathered through the KYS questionnaire, including evaluating supplier risk profiles and determining appropriate follow-up actions.

## **2. Internal policies and governance**

Blommer also has in place a Code of Conduct and Ethics Policy (the "Ethics Policy") applicable to all employees. Employees are required to read, review, and comply with the Ethics Policy, which is introduced as part of onboarding and reviewed periodically.

The Ethics Policy prohibits the use of child labour and forced labour within the company's operations: Blommer does not and will not employ child labour, defined as individuals under the age of sixteen, and it prohibits all forms of forced labour, meaning any work or service performed involuntarily under threat of penalty. The Ethics Policy makes clear that all employment is voluntary, and employees retain the right to terminate employment at any time. It also includes provisions supporting broader labour protections and mitigation of risks associated with forced labour and child labour, including:

- Migrant labour protections: Verification of legal work authorization and provision of working conditions (including wages and hours) comparable to other employees performing similar work;
- Working hours compliance: Adherence to applicable laws governing working hours, rest periods, and overtime;
- Freedom of association: Respect for lawful rights to form and join trade unions and bargain collectively; and
- Health and safety: Commitment to a safe and healthy workplace, including hazard control, regulatory compliance, and ongoing review of incidents and near misses.

To support adherence to these and other policies, Blommer maintains a 24/7 Compliance and Ethics Hotline readily accessible to all employees. The company encourages employees to report any actual or suspected violation of law or company policy, and employees may do so through multiple channels, including by making anonymous reports through the hotline.

Given the nature of the company's operations as a relatively small manufacturer with employees primarily located in its manufacturing facilities and corporate offices in the United States and Canada, as well as a limited number of employees on the Sustainability team in Côte d'Ivoire, the company assesses the risk of forced labour and child labour within its own workforce to be low. Nevertheless, these internal policies and reporting mechanisms establish clear expectations and accountability.

### **3. Continuous improvement**

Blommer recognizes that its policies and due diligence processes are evolving and is committed to continuous improvement. This includes strengthening supplier engagement, enhancing risk assessment methodologies, and reinforcing internal awareness through its Ethics Policy and reporting mechanisms to better identify and address risks of forced labour and child labour.

#### **C. Forced labour and child labour risks**

Blommer recognizes that risks of forced labour and child labour are most likely to arise in its upstream supply chain, particularly in connection with the sourcing of cocoa, palm and palm kernel oils, and other agricultural raw materials.

To identify and understand these risks, the company considers publicly available information from recognized sources, including the U.S. Department of Labor's Bureau of International Labor Affairs (ILAB) List of Goods Produced by Child Labor or Forced Labor, as well as the Department of Labor's LaborShield tool. These resources identify cocoa as a commodity that may be associated with risks of child labour in certain producing countries and provide country- and sector-specific risk insights that inform the company's understanding of potential exposure.

Blommer also draws on information obtained through its on-the-ground activities in Côte d’Ivoire, the world’s largest cocoa-producing country. As a part of Blommer’s field assurance work in Côte d’Ivoire, the company assesses select farmer groups prior to onboarding by evaluating forced labour and child labour risks, at both the farmer group level and, on a sample basis, the individual farmer level. The results of these assessments are used to develop relative risk scores that inform some of its onboarding decisions. Although the farmer groups and farms subject to these assessments may not be linked to the company’s supply chain in Canada, the insights that Blommer obtains directly contribute to its broader understanding of forced labour and child labour risks and inform its overall risk identification approach.

Based on the above, the company has identified that its primary exposure to risks of forced labour and child labour lies in upstream agricultural sourcing, particularly in regions where such risks have been documented. By contrast, Blommer considers the risk within its own manufacturing operations in Canada and the United States to be low, as its workforce is directly hired and managed by the company in jurisdictions with established labour and employment protections.

#### **D. Remediation measures**

During the reporting period, the company did not identify any confirmed cases of forced labour or child labour in its supply chain through its current, developing due diligence processes for its Canadian manufacturing operations or Canadian market and therefore did not undertake remediation measures within its own supply chain. However, recognizing that child labour remains a systemic risk within the cocoa sector, Blommer has supported and implemented community-level development programs in cocoa-growing communities in Côte d’Ivoire where vulnerabilities are known to exist.

For example, Blommer has played a key role in establishing Village Savings and Loan Associations (VSLAs) to create economic opportunities for women. VSLAs are largely women-led, self-managed groups that provide members access to savings and small loans for micro-enterprises, their children’s education, and other urgent household needs. These initiatives are intended to strengthen household income stability and reduce economic pressures that can contribute to child labour.

During the most recent cocoa season (October 2024 – September 2025), Blommer confirmed that 476 of the 876 VSLAs established since 2017 with Blommer’s support and facilitation remained active across 88 villages. As of September 2025, these VSLAs included a total of 14,756 members, of whom 74% were women.

In addition, Blommer participates, as one of several contributing industry participants, in the Women and Cocoa Communities Initiative (IFCC) in Côte d’Ivoire, a multi-stakeholder program funded largely by Global Affairs Canada and implemented by development partners, including SOCODEVI and the Fondation Paul Gérin-Lajoie. The IFCC program aims to improve living conditions in cocoa-growing communities, with a particular focus on women and adolescent girls. Program activities include strengthening women’s groups and VSLAs, supporting income diversification initiatives, and increasing access to economic and productive resources. These

efforts are intended to address underlying socioeconomic drivers of child labour by promoting household resilience and alternative livelihood opportunities.

As part of the initiative, climate-resilient agricultural practices are promoted, including the establishment of shade tree nurseries operated by farmer groups. Shade trees play an important role in cocoa cultivation by protecting cocoa plants from excessive heat and improving soil health, which can enhance long-term productivity and resilience. These nurseries support reforestation and cocoa farm sustainability by distributing seedlings to farmers, supported by local governance structures and training in areas such as environmental practices and resource management.

Blommer recognizes the significant role that women in cocoa farming communities play in food security, education, and health outcomes for their families, and so its community development projects are designed to expand economic opportunities for women in these regions.

While these programs address underlying risk factors associated with child labour in cocoa in Cote d'Ivoire, they are not linked to or directed at any specific identified instances in Blommer's Canadian supply chain. As such, Blommer's community-level initiatives constitute preventive and supportive measures in cocoa farming communities rather than remediation of identified cases.

#### **E. Remediation of loss of income**

Blommer understands that remediation of loss of income may be necessary where actions taken to address forced labour or child labour result in unintended adverse impacts on workers or communities.

At this time, the company is not aware of any instances within its operations or supply chains where its actions to prevent or mitigate forced labour or child labour have resulted in a loss of income to vulnerable families or individuals. Accordingly, the company has not implemented specific measures to remediate such loss of income.

As described above under the section on remediation measures, Blommer's existing activities in cocoa-producing regions include initiatives aimed at supporting broader prevention and remediation efforts, such as promoting economic resilience and alternative livelihood opportunities. These activities may contribute, more generally, to addressing underlying risk factors associated with forced labour and child labour.

Blommer will continue to monitor its due diligence activities as they develop and will consider whether additional measures are appropriate should any instances of loss of income related to its actions be identified.

#### **F. Training**

Blommer recognizes the importance of training in supporting the identification and prevention of risks of forced labour and child labour in its supply chain. Training activities related to these risks have been primarily focused on workshops specifically designed for members of the company's Community Development team based in Côte d'Ivoire.

In June 2025, employees participated in a two-day workshop held in Gagnoa, Côte d'Ivoire, which included 14 company staff among a total of 24 participants. This workshop focused on identification of forced labour and child labour risks, including the forms such risks may take in the cocoa supply chain, as well as approaches to prevention and remediation. This workshop was facilitated by Blommer in collaboration with Save the Children and SOSTECI (Système d'Observation et de Suivi du Travail des Enfants en Côte d'Ivoire), Côte d'Ivoire's child labor observation and monitoring system.

In July 2025, employees participated in a three-day workshop also held in Gagnoa, Côte d'Ivoire. This session focused on capacity building for Village Savings and Loan Association (VSLA) group facilitators. While not specifically focused on forced labour and child labour, the training supported the company's Community Development team in its mission to support broader remediation and prevention efforts aimed at promoting economic resilience in cocoa-growing communities. This workshop was facilitated by Blommer in collaboration with Save the Children.

Blommer considers these targeted, role-specific training efforts for personnel operating in higher-risk regions to be an important component of its current approach, as such trainings are designed to build practical, on-the-ground awareness and capacity in areas where forced labour and child labour are more likely to arise.

Outside of these workshops, the company has not implemented formal, structured training programs specifically dedicated to forced labour and child labour risks for its broader employee population. However, employees are expected to comply with the company's Ethics Policy, which is introduced during onboarding and reviewed periodically.

Blommer expects that, as its policies and due diligence processes continue to develop, it will further consider how additional training may support its approach to identifying and addressing risks of forced labour and child labour.

### **G. Assessing Effectiveness**

Blommer recognizes the importance of assessing the effectiveness of its actions to prevent and reduce risks of forced labour and child labour in its operations and supply chains.

As described above, the company has recently implemented initial supplier-focused due diligence measures, including a Know Your Supplier (KYS) questionnaire and related Human Rights Survey. This process is in the early stages of implementation, and the company is in the process of developing its approach to reviewing and evaluating the information obtained through these tools.

At this stage, the company has not established formal metrics, monitoring systems, or key performance indicators to measure the effectiveness of its policies and due diligence processes in identifying and addressing risks of forced labour and child labour. That said, Blommer maintains internal governance mechanisms, including policies, training, and reporting channels such as its Compliance and Ethics Hotline, which provide a framework for identifying and escalating potential issues within its operations. The company is undertaking qualitative review of supplier

responses and supporting documentation as part of its developing due diligence. While these mechanisms are not designed specifically to measure effectiveness, they contribute to overall oversight.

With respect to its own manufacturing operations, in Canada and in the U.S., the risk of forced labour and child labour is low, as employees are directly hired and managed by the company in jurisdictions with established labour and employment protections. As a result, the company has not implemented specific monitoring mechanisms for forced labour and child labour within its workforce beyond existing reporting channels.

Blommer expects that, as its due diligence processes continue to develop and mature, it will be better positioned to evaluate their effectiveness. At present, however, the company is focused on establishing and refining its foundational processes before implementing a formalized mechanism to assess effectiveness.

### **Approval and attestation**

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act), and in particular section 11 thereof, I, in the capacity of Chairman and Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report.

I have the authority to bind Blommer Chocolate Company, LLC

*Kunihiko Ogata*

Kunihiko Ogata  
Chairman & CEO  
May 29, 2026