



Packers Of Quality Apples

Tel: 905-987-4961  
Fax: 905-987-1472  
201 Regional Road #42,  
Newcastle, ON L1B 0T9

[www.algomaorchards.com](http://www.algomaorchards.com)

## Bill S-211

“The Supply Chain Act”

Fight against forced labour and child labour in supply chains act

## Financial reporting year 2023 Submission

**Algoma Orchards Corp**

Business # 774125538

201 Regional Rd 42

Newcastle, Ontario

L1B 0T9

## Business Owners

Kirk Kemp

Eric Kemp

Byron Kemp

“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.”

- Kirk Kemp
- President, Algoma Orchards
- May 31, 2024

“I have the authority to bind ‘Name of Entity.’”

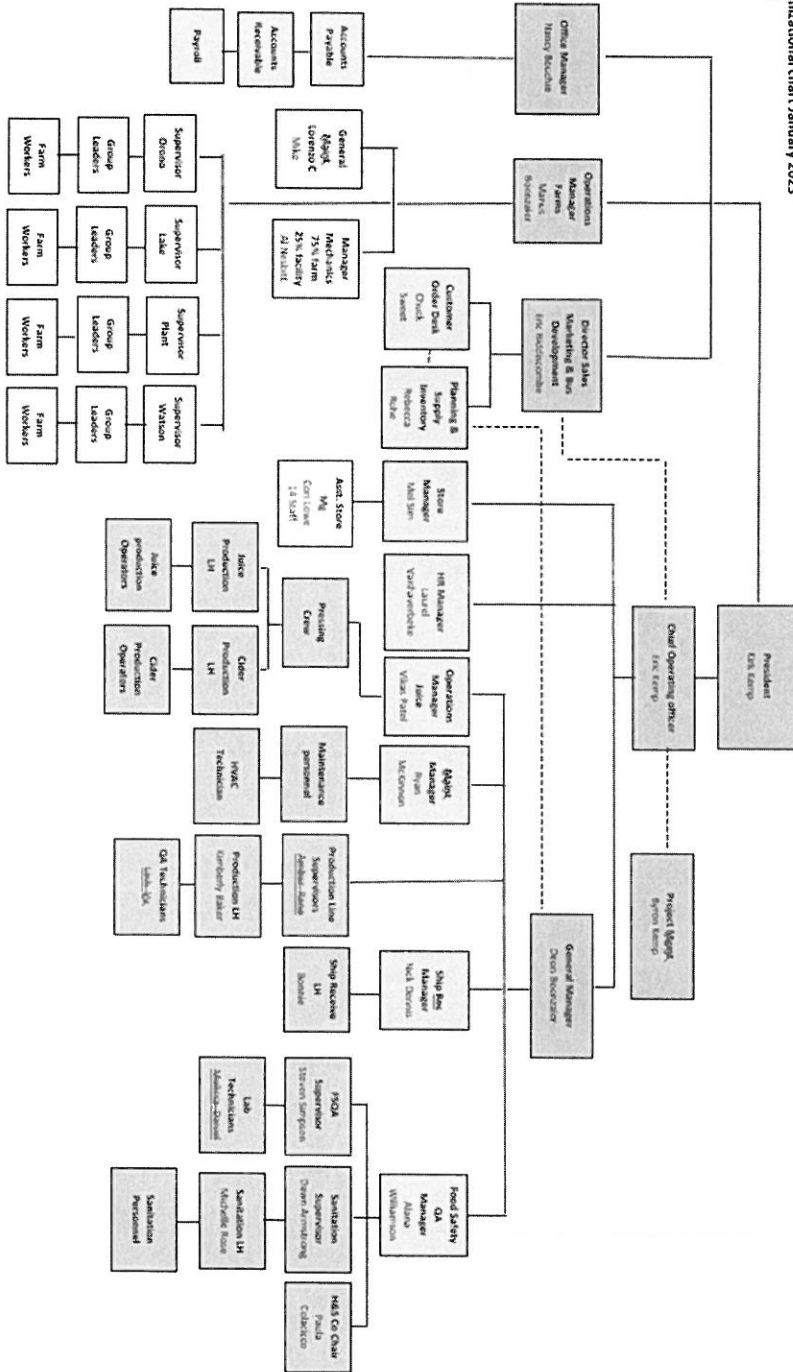


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Algoma Orchards  
 Organizational chart January 2023  
 Final



124 Total Domestic employees employed by Algoma Orchards



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- 4 generation farming operation located in Newcastle Ontario
- Largest independent apple grower in Canada
- Largest organic grower in Canada
- 2,500 acres in total
- We also partner with 30 third party growers under the Algoma umbrella



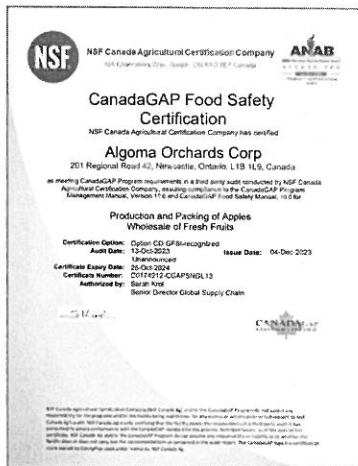


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- 250,000 sq ft fresh packing facility and juicing operation
- Currently we do business with all major retailers in Eastern Canada
- We grow, pack and ship domestically approx. 88,000,000 lbs of apples
- Packing house and farm is Canada Gap certified
- Juicing operation is SQF certified





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## Child Labour Policy

Our child labor policy is our position on employing minors and aims to ensure that our company, its subsidiaries and everyone we're connected with follows the law and cares for children's interests.

International, local and federal child labor laws are stricter today than they were years ago. But millions of children are still forced to work in bad conditions all around the world, even in developed countries.

As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn't take part in children's exploitation and also helps end it to the best of our ability.

### Scope

This policy applies to our entire organization and those we do business or partner with including suppliers, vendors and contractors.

The [International Labour Organization \(ILO\)](#) and the [U.N Convention on the Rights of the Child](#) guide our policy on child labor. When it comes to legal aspects, we always:

- Follow the stricter law if more than one law applies (e.g local, provincial and federal)
- Require suppliers, partners and vendors to follow the stricter applicable laws and recognize children's rights. They must also require their own suppliers, subcontractors and stakeholders to do the same.

In this policy, we refer to "children" as people who are younger than [18] years of age. "Young children" are people younger than [14].

"Child labor" refers to work that deprives children of their childhood and affects their schooling, their potential and their dignity. It's work that's harmful to them mentally, physically and socially.



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## Policy elements

### Young children

When it comes to young children (younger than [14]), we don't want to stand in the way of their health, schooling or free time. That's why we don't and won't employ anyone younger than [15 years] of age and require our subsidiaries to do the same, regardless of the country they're in.

We're also committed not to do business with any organization that employs children younger than [15].

#### *Legal exceptions*

*[Agriculture. Many laws make the distinction between agricultural and non-agricultural jobs. Agricultural job requirements for minors may be less strict, especially if a child works at a family-owned farm. In these cases, we'll follow the law when doing business with agricultural businesses and we'll make sure that children involved aren't placed in danger via regular audits and official documentation.]*

**Parental employment.** We might occasionally do business with family-owned businesses. Those businesses are usually allowed to employ the owner's children as long as the work isn't too hazardous (e.g. mining, manufacturing). We accept this regulation, but we'll still dissolve our contract if it comes to our attention that these children are exposed in danger or are working consistently during school hours.

**Occasional work.** Sometimes, parents bring their children to work to teach them skills and introduce them to a work environment. They may also hand them some tasks to complete (e.g. a painter may ask his child to help with a painting job he's taken). This is an acceptable practice, as long as it doesn't deprive children of school on a consistent basis or puts them in any danger. (For example, the painter shouldn't allow his son to inhale toxic paint or ask him to climb on scaffolding.)

### Older children

When it comes to employing children who are older than [15], we'll always follow the local, provincial and federal laws. As a general rule, these children can have a job, but they should never do work that jeopardizes their health and safety or affects their schooling and development.

With this rule in mind, we may employ children older than [15] as referenced in the Employment Standards Act.



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## Actions and Implementation

To make sure we enforce this policy and help eliminate child labor, we're committed to:

- Educating our staff on youth work laws and show them how to report child labor if they see or suspect it.
- Requiring hiring managers and Human Resources to avoid hiring minors under the legal age for working, as referenced in the Employment Standards Act.
- Keeping and validating documentation verifying our employees' age after they're hired. If we discover that we've hired a minor under the age of 15, we'll review applicable laws and adjust employment accordingly.
- We will request GRASP Certifications annually from our offshore business partners

## Children's welfare is everyone's business

We want to grow and thrive as a business, but we're also committed to do good by the community we belong in. We ask all of our employees and partners to follow this policy, not just because we demand it as an organization, but because securing a bright future for children is everyone's duty.

**Kirk Kemp**  
President  
Owner  
Algoma Orchards

**Eric Kemp**  
Chief Commercial Officer  
Owner  
Algoma Orchards

**Byron Kemp**  
Owner  
Algoma Orchards

**Date :**

*Disclaimer: This policy is meant to provide general guidelines and should be used as a reference. It may not take into account all relevant local, state or federal laws and is not a legal document. Neither the author nor Workable will assume any legal liability that may arise from the use of this policy.*





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### **Risk Assessment**

#### **Local Labour Hiring Packing House and Farms (Ontario)**

124 people in total. We hire fulltime and part time employees for both our packing house and farm operations.

#### **Mitigating Risk**

This is a low risk as we utilize the Employment Standards Act as our guideline for all hiring

#### **Local Labour Hiring Transportation (Ontario)**

We hire fulltime and part time employees for our transportation division

#### **Mitigating Risk**

This is a low risk as we utilize the Employment Standards Act as our guideline for all hiring

#### **Foreign Worker Program**

Each season we hire approximately 250 foreign workers from Mexico , Jamaica, Barbados, South Africa utilizing 2 established Government programs

- ✓ 2 year temporary foreign worker program
- ✓ 8 month seasonal agricultural stream program

#### **Mitigating Risk**

This is a low risk as we utilize the following agencies to source and administer program under agricultural guidelines:

- ✓ Foreign Agricultural Resource Management Services, Mississauga Ontario
- ✓ Working Link , Mexico

#### **Third Party Growers under the Algoma umbrella**

We partner with 33 growers located in Ontario. We purchase and pack their apples and provide marketing services selling their apples through Algoma to our retail partners. Their business model is similar to ours in that they rely on foreign worker programs to support their businesses for the harvest.

#### **Mitigating Risk**

This is low risk as these growers also utilize agricultural program and guidelines developed by government agencies.

- ✓ 2 year temporary foreign worker program
- ✓ 8 month seasonal agricultural stream program

In addition they hire local labour using guidelines as laid out in the Labour Standards Act





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#### **Vendor Suppliers (goods not for resale)**

Procurement of supplies and equipment for packing house, juicing and farm operations.  
We have 100 vendors that we purchase \$100,000 or more on an annual basis

#### **Mitigating Risk**

This is low risk as the majority of our procurement purchases are sourced within Canada.  
Any out of country equipment is purchased within the G7 countries where Labour regulations are well established similar to Canada

#### **Offshore Apple and Pear Sourcing**

We import apples and pears from Chile, New Zealand and Argentina to ship to our customers in Canada.  
In 2023 we imported 139 containers in total.

#### **Mitigating Risk**

This is a low risk as we utilize Paramount a third party distributor who sources from established reputable farms. All Farms are Food Safety certified and also have GRASP certification. We currently have 34 GRASP certifications on file for this offshore season. These certifications are renewed annually which we have on file. Our retail partners also hold us to a high level of accountability with their Corporate Social Responsibility policies. (Costco, Loblaw & Walmart)

#### **Action Steps as a result of poor behaviour**

We have not taken any action steps as a result of poor behaviour that would result in financial hardship to any business or person.

#### **Ongoing with our program to mitigate Risk**

- ✓ We will continue to abide by Labour Standards Act guidelines
- ✓ We will continue to request Grasp certifications annually for all Offshore apple and pear purchases prior to start of season. This is in alignment with our retail partner expectations.
- ✓ We will review the Labour Standards Act and its guidelines and Bill S-211 with our 34 grower partners at our annual meeting and one on one visits prior to harvest
- ✓ We will continue to purchase from reputable companies when purchasing goods for not resale for our pack house, Juicing operation and farming operations