

A REPORT PURSUANT TO:

Section 11 of the Fighting Against Forced Labour
and Child Labour in Supply Chains Act

ON BEHALF OF:

Concorde Group Corp.,
LID Brokerage & Realty Co. (1977) Ltd.,
and Krown Produce Inc.

Section 11(2) Joint Report



Annual Report
January 1st to December 31st, 2023

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I. ABOUT THE REPORT

This joint report (“**Report**”) has been prepared on behalf of Krown Produce Inc., LID Brokerage & Realty Co. (1997), and their parent company, Concorde Group Corp. (collectively and hereinafter referred to as “**Concorde Group**”) pursuant to subsection 11(2) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C., 2023, c.9 (the “**Act**”). Although this Report will refer to reporting entities as “Concorde Group”, this Report relates to each of the reporting entities.

This Report constitutes the first report prepared by Concorde Group pursuant to the Act on the steps taken, during its previous financial year ended December 31, 2024, to prevent and reduce the risk that forced labour or child labour is used at any steps in the production or transport its goods imported into Canada by Concorde Group and its subsidiaries. This Report will be published and updated annually to document our ongoing commitment to improve our processes, protect human rights, and battle the use of forced labour and child labour.

II. OPENING STATEMENT

The division of Concorde Group that imports goods into Canada is its produce division, which is often referred to as Krown Produce. One of Krown Produce’s primary mandates is to continue to be a trusted supplier of fresh produce and other food products for Canadian families through its unwavering commitment to first-class products and reliable service. In the provision of quality fresh produce from around the globe, Concorde Group recognizes that risks of forced labour and child

labour (also referred to as modern slavery) exist and acknowledges that understanding and managing these risks requires a collaborative approach with our suppliers, our workforce, and other external stakeholders. We remain committed to educating our workforce on the risks and effects of forced and child labour in an effort to both identify risks of such activities and to encourage mitigation and prevention efforts. While these efforts will evolve over time, they will be persistent.

III. REPORTING CONTENTS

A. Subsection 11(3)(a) – Structure, Activities, and Supply Chains

Structure and Mandate:

Concorde Group Corp. is the parent of a private conglomerate of Canadian-controlled companies, known as “The Concorde Group of Companies”, including Krown Produce Inc. and LID Brokerage & Realty Co. (1977) Ltd. Within the diverse business verticals that make up The Concorde Group of Companies is a produce division, known as “Krown Produce” and “The LID Company” (hereinafter and collectively referred to as “**Krown Produce**”), that is proud to be a leading supplier of fresh produce and other food products in Western Canada. For over 50 years, Krown Produce, has pioneered and led in the supply of fresh produce from around the world to retailers, wholesalers, and distributors.

Concorde Group is proud to employ over 500 individuals from across Western Canada and beyond. Each company which

forms part of Concorde Group is managed by a senior leadership group that all report to the Executive Team of Concorde Group Corp., which includes Concorde Group Corp's President & CEO, L. David Dubé.

The employees of Concorde Group are passionate about providing the best possible products and service to their customers in a manner that always exceeds expectations. These guiding principles have allowed Concorde Group to continue to grow and to invest in its communities. We are proud of Concorde Group's rich history of philanthropy and continue to follow the incredible lead of Concorde Group founders, Leslie and Irene Dubé, in this regard. Community support and philanthropy form an important part of Concorde Group's mandate.

Krown Produce is also proud to be associated with a number of recognized organizations, such as Canadian Produce Marketing Association, CPMA Canadian Food Safety Fund, International Fresh Produce Association, and B.C. Produce Marketing Association.

Activities and Supply Chains:

Concorde Group is involved in a diverse range of businesses, including real estate development and management, restaurant operations and management, sports and entertainment management, fresh produce sales and logistics, and a host of other enterprises. This Report is required as a result of Concorde Group's import and distribution activities; however, the measures and protocols identified in this report apply to each of Concorde Group's business operations.

With respect to Concorde Group's produce business operations, Krown Produce imports fresh fruits and vegetables of almost any kind and volume from several countries around the world. Although some of Krown Produce's imports are sourced outside of Canada, Krown Produce is proud to support North American growers and producers by sourcing the majority of its products through its Canadian and American partners, including from its own growing operations in Western Canada.

The Krown Produce supply chains consist of thousands of suppliers that provide goods, materials, and services to Krown, including growers, transportation service providers, and various other contractors, subcontractors, vendors and consultants. Krown's suppliers play a key role in our ability to meet our environmental, social and governance goals. Many of these suppliers have worked with Krown for decades and have become trusted business partners. It is to this end that Krown is able to attest to the character and ethical standards of its suppliers who are proud to:

- endeavour to be leaders in their respective industries;
- remain committed to the highest ethical standards;
- observe policies and procedures similar to those identified in this report; and
- share in Krown's core values of providing exemplary service and top-quality products in a manner that respects human rights and promotes safety, integrity, and community well-being.

For the financial year ending December 31, 2023, the overwhelming majority of suppliers from which goods were imported into Canada by Krown Produce were domiciled in countries that have enacted comprehensive human rights and employee protection legislation, such as the United States of America, Australia, and New Zealand. Krown's goods are then distributed primarily throughout western Canada to customers that range from largescale retail grocers to owner-operated restaurants.

B. Subsection 11(3)(b) – Policies and Due Diligence Processes

Our Policies and Standards:

The directors and executive team of Concorde Group have always led the organization with business and management practices that aim to support human rights and encourage social responsibility. Some of these practices have been formalized through written policies and others are in the process of being implemented as formal policies as the organization continues to grow and develop. The following will highlight some of these policies that help serve the goal of the Act in fighting child labour and forced labour.

Code of Conduct Policy

Concorde Group is continuing to revise its *Code of Conduct*, which outlines expectations with respect to conflicts of interest, protection of proprietary information and company assets, legal compliance, proper workplace behaviours, and will also emphasize our dedication to upholding human rights. For the

purpose of this Report, our *Code of Conduct* will continue to be revised in the upcoming year to specifically implement a zero-tolerance stance against any form of human rights violation, including the use of forced labour and child labour in our operations or supply chains. Additionally, the *Code of Conduct* will provide protections to those individuals who report, in good faith, any violation of our *Code of Conduct*.

The Code of Conduct will be reviewed annually by our Executive Team and the Board of Directors to ensure it continues to adequately uphold our mandates, including our stance against forced labour and child labour.

Supplier Code of Conduct

As stated previously in this Report, Concorde Group enjoys close, longstanding relationships with most of its suppliers and we are proud to work with suppliers who share in our vision for ethical and responsible business practices worldwide. That being the case, we still recognize the potential for risk of forced labour and child labour in our extended supply chain and we are committed to taking steps to address those risks. In this regard, Concorde Group continues its efforts to formalize and revise its *Supplier Code of Conduct* (the “**Supplier Code**”), which will be provided to all suppliers that source product from areas that are identified as “high risk” through the processes and protocols set out in this Report. Additionally, the Supplier Code will be incorporated in supplier contracts.

The Supplier Code will outline Concorde Group's expectations regarding the ethical standards and business practices of our suppliers, including standards regarding human rights, employee and public safety, social and environmental

responsibility, anti-corruption, and compliance with applicable local and international laws. The Supplier Code will also include specific requirements related to forced labour and child labour, such as:

- Suppliers are prohibited from threatening or subjecting workers to harsh or inhumane treatment, which includes but is not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company facilities.
- Suppliers must not engage in human trafficking or any form of slave labour, forced labour, bonded labour, indentured labour, or prison labour.
- Labour provided to suppliers must be voluntary, and workers must have the freedom to resign from their employment upon reasonable notice.
- Suppliers shall evaluate the risks of forced labour and child labour in their supply chains and take appropriate actions to responsibly eliminate any instances of child labour they discover.
- Suppliers shall follow the *Minimum Age Convention, 1973 (No. 138)* for acceptable ages of employment, which sets a minimum age for admission to general employment at 15 years, with an allowable exemption at 13 years of age for light work and a prohibition for hazardous work until 18 years of age.
- Supplier employees must not be required to surrender any government issued identification, passports or work permits as a condition of employment.
- Suppliers are responsible for ensuring that third-party agencies supplying workers comply with the Supplier Code and applicable laws.
- Suppliers are prohibited from engaging with businesses known to violate human rights, including through the use of forced labour or child labour.

Suppliers will be expected to preserve documentation to demonstrate compliance with the Supplier Code in accordance with applicable local and international laws, and the terms of their contract with Concorde Group. Concorde will also reserve the right to request that suppliers provide additional information for the purpose of confirming compliance with the Supplier Code.

Lastly, and although the ultimate goal is to ensure compliance with the Supplier Code, Concorde Group recognizes the complexities involved in eliminating Forced Labour and Child Labour; and, as such, Concorde will reserve the right to retain the services of third-party agencies to support suppliers and their employees as they work to comply with the Supplier Code.

Due Diligence Processes:

As part of Concorde Group's dedication to combatting forced labour and child labour, we perform continual due diligence assessments throughout our supply chain to proactively identify, address and mitigate potential human rights issues. Our formal

policies, codes of conduct, and employee education programs will support the following due diligence procedures to evaluate risks within our supply chains:

- If a supplier is identified as being at risk for forced labour or child labour through Concorde Group's assessment procedure outlined below, a questionnaire will be provided to the supplier to identify, manage and monitor human rights issues, and the responses will be reviewed by dedicated personnel.
- Concorde Group works with its external consultants and legal counsel to incorporate in procurement contracts provisions which incorporate the Supplier Code and compliance with relevant local and international laws. As detailed above, the Supplier Code expressly prohibits the use of child labour, forced labour, human trafficking or any other form of modern slavery. Concorde reserves the right to request that suppliers provide additional information for the purpose of confirming compliance with the Supplier Code.
- Supplier reviews and periodic discussions that address human rights, as well as forced labour and child labour, will be conducted with Concorde Group's significant suppliers that are determined to carry a high risk of forced labour or child labour.
- Concorde Group is revising its onboarding education for new employees to cover its revised Code of Conduct and the Supplier Code. For employees that may be exposed to suppliers that carry a risk of forced labour or child labour, specific education will be provided in an effort to

help those employees identify such risks and understand the consequences of such business practices.

- Concorde Group's external consultants are retained to advise Concorde's executive team of risks with any particular supplier or region from which Concorde Group imports goods. This information supports the training and education provided to Concorde Group employees who are instrumental in helping to identify risks of forced labour and child labour.
- As a supplier of fresh produce to western Canada for over 50 years, Concorde Group is passionate about procuring product from trusted suppliers with whom which they have enjoyed a longstanding relationship. As such, Concorde employees regularly visit supplier facilities and communicate directly with supplier principals. Although such visits and communications are not specifically part of the due diligence processes outlined in this Report, they provide a level of trust and comfort with supplier operations that should not be understated.

C. **Subsection 11(3)(c) – Identify and Assessing Risks of Forced Labour or Child Labour**

As the entire Concorde Group workforce is governed by the federal and provincial laws within Canada, or the federal and state laws of the United States of America, there is a very low risk of forced labour or child labour within the Concorde Group workforce. For this reason, our due diligence and assessment protocols are focused on risks within our global supply chain;

however, the efforts to educate our employees on identifying risks in the supply chain will also serve as regular reminders to employees of the ethical and social responsibility standards that are expected of Concorde Group.

Concorde Group's only identifiable risk of exposure to forced labour and child labour is through its supply chain – and, fortunately, only a very small portion of its supply chain carries any risk since Concorde Group's imports into Canada are sourced largely from countries with comprehensive legislation protecting human rights and employees. In addition, even for those suppliers that are domiciled in countries known to carry a risk of child labour and forced labour, most of those such suppliers have longstanding relationships with our organization and regularly welcome our employees to visit their facilities. Nevertheless, we recognize the potential risks of forced labour and child labour in our extended supply chain and the challenges in addressing those risks.

As the number of suppliers to Concorde Group that carry a risk of forced labour and child labour are very small based on the countries within which they operate, the task of identifying such risk can be a shared effort between Concorde's employees, executive team, and external consultants. We also work with our legal advisors to add provisions in contracts with suppliers that incorporate our Supplier Code of Conduct. In addition, our external consultants are instructed to advise Concorde's executive team of risks with any particular supplier or region from which Concorde Group imports goods, which assists in the training and education provided to Concorde Group employees. For example, external consultants have worked with Concorde Group's executive team to ensure suppliers from Brazil are not included on the "Dirty List" published by the Brazil

Government's Division of Surveillance for Eradication of Slave Labour.

During employee onboarding, all employees of Concorde Group are required to review all company policies and procedures applicable to their specific position. For employees that may be exposed to suppliers that carry a risk of forced labour or child labour, specific education will be provided in an effort to help those employees identify such risks and understand the social consequences of such business practices. We continue to work with external legal counsel to further develop our policies and training to ensure our employees are empowered with the most accurate information and the confidence to promote our policies and mandate of ethical business practices.

If an employee, director, or officer of Concorde Group identifies a material risk of forced labour or child labour within our supply chain, company policy encourages the reporting of such risk to senior management with the promise of anonymity and other protections offered to the reporting party. Thereafter, the risk is assessed by Concorde Group's executive with the assistance of external consultants and a plan of action is determined based on Concorde's internal escalation procedure.

D. Subsection 11(3)(d) – Remediation Measures re: Forced Labour or Child Labour

Concorde Group is proud to partner with suppliers who are committed to the same policies identified in this Report which strive to not only combat Forced Labour and Child Labour, but also to promote the highest ethical standards, continually strive for improvement, and actively improve local communities

through volunteer and philanthropic endeavours. Fortunately, the need for remediation measures within the supply chain for Concorde Group and Krown was not identified during the most recent reporting period through Concorde Group's due diligence and review protocols. Although the need for remediation was not identified, we will continue to review our policies and due diligence processes; educate our employees, directors, and shareholders; and, promote best business practices in an effort to continue the battle against child and forced labour within the Concorde Group supply chain and beyond.

E. Subsection 11(3)(e) – Remediation Measures for Lost Income

As indicated in the preceding section, we did not identify any instances of forced or child labour in Concorde Group's activities or supply chains for the most recent reporting year. As a result, no measures were required to eliminate the use of forced labour or child labour; and, no measures were required to remediate loss of income for the most vulnerable families that could result from any measures to eliminate forced labour or child labour.

F. Subsection 11(3)(f) – Training for Employees, Directors, and Officers

As mentioned earlier in this Report, all employees of Concorde Group are required to review all company policies and procedures applicable to their specific position during the onboarding process, including the *Supplier Code*. As part of our commitment to uphold human rights throughout our

organization and supply chain, Concorde Group's directors and executive group continue to review and revise current policies while also developing new ones to further mitigate risks to human rights globally. Concorde Group believes that even if a risk of child labour or forced labour is never encountered in its supply chain, educating our employees on such issues will still assist in the global effort against such business practices.

Concorde Group continues to work with external consultants and legal counsel to further develop training and educational materials that address emerging risks of forced labour and child labour so that our employees are equipped with the most current information as they continue to assess our operations and supply chains for such risks. During the most recent reporting period, Concorde Group was focused on reviewing and revising current training material while also working with legal counsel to develop educational material that specifically addresses forced labour and child labour. In 2024, we anticipate providing specific education for all employees on the risks of forced labour and child labour in addition to the material provided through internal policies, such as the *Supplier Code*.

G. Subsection 11(3)(g) – Assessing Effectiveness of Policies and Due Diligence Processes

Concorde Group continues to believe it is the responsibility of all businesses to operate ethically, responsibly, and with a view to always improve. Concorde welcomes the opportunity created by the Act to improve its internal policies and processes to further combat the risks of forced labour and child labour within its supply chain. While the focus in this regard during the past reporting period was directed to reviewing current policies and

developing new ones, we will be implementing an annual assessment process to ensure that the policies, processes, and education detailed in this Report are as effective as possible and can be enhanced in the future to address emerging risks and trends.

For over 50 years, Concorde Group has been successfully assessing its business practices and processes to ensure it remains a leader in the industries in which it operates. As part of our mission to remain an industry leader, we are committed to perpetuating our responsible and ethical business practices, which include the further development of policies and processes to assist in the effort to end forced labour and child labour. As these policies and processes are enhanced and developed, our executive team will assess their effectiveness on an annual basis and work with legal counsel to ensure such policies and process can adapt to emerging trends and remain as effective as possible.

IV. APPROVAL AND ATTESTATION

A. Approval

This Report has been approved by the Board of Directors of Concorde Group Corp. in accordance with the requirements for joint reports pursuant to subsection 11(4)(b)(ii) of the Act.

B. Attestation

For and on behalf of Concorde Group Corp., LID Brokerage & Realty Co. (1977) Ltd., and Krown Produce Inc.:

“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.”



L. David Dubé
President & CEO

May 28, 2024

(I have the authority to bind the corporations listed above)