

The Oppenheimer Group - Modern Slavery Report

1 Introduction

- 1.1 At the Oppenheimer Group, we are committed to acting ethically and with integrity in all of our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business. We strive to work ever more closely with our suppliers to ensure their workforce, and the workforce of their supply chains are treated with respect and dignity. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products responsibly.
- 1.2 This is our first modern slavery report pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9), made for the financial year ended **December 31, 2023**. We acknowledge that stamping out modern slavery and human trafficking risk is a process that will take time. Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain.

2 Our organisational structure, business operations and supply chains

- 2.1 For purposes of this report, the Oppenheimer Group comprises Grandview Ventures Ltd. (the top parent company) and its subsidiaries David Oppenheimer and Associates General Partnership, Grandview Brokerage Limited and Coronet Investments Ltd (collectively, "Oppenheimer").
- 2.2 Grandview Ventures Ltd. is sole shareholder of Grandview Brokerage Limited, which is the sole shareholder of Coronet Investments Ltd. All three are holding companies registered in British Columbia and none have any employees.
- 2.3 David Oppenheimer and Associates GP, the only reporting entity of the Oppenheimer Group that is an operating company, is a General Partnership registered in British Columbia and Alberta. It is owned by Grandview Brokerage Ltd. and Coronet Investments Ltd., and is an importer and distributor of fresh produce. Its activities include the import, transportation, warehousing, sales, marketing, and distribution of fresh produce to retailers and wholesalers throughout Canada.
- 2.4 The fresh produce Oppenheimer sells through its operating company is sourced from growers and suppliers located in countries including Argentina, Australia, Brazil, Canada, Chile, China, Columbia, Greece, India, Italy, Japan, Mexico, Morocco, New Zealand, Peru, South Africa, Spain, USA and Uruguay. Our supply chain includes ancillary services that contribute to our main produce brokerage operations, such as transportation, repacking, and warehousing.
- 2.5 To learn more about our business, please see www.oppo.com.

3 Our risk profile

- 3.1 We believe that risks of forced labour and child labour are low within our own business operations. Our team members are employed in Canada, where employment is freely chosen and there is a relatively low prevalence and social acceptance of child labour.
- 3.2 That said, we do recognise that risks of modern slavery may be higher in our supply chain, especially in sectors such as transportation and agriculture, which are supplied by providers from outside Canada and the US. Since the workers supporting our business indirectly on farms and in transportation businesses are not employed directly by Oppenheimer, we have less control and visibility over their working conditions and employment terms. We will continue our efforts to map our supply chain and classify supplier risks to identify and improve our understanding of modern slavery risks.

4 Our policies

- 4.1 Oppenheimer's Code of Business Conduct and Ethics (the "Code") reflects our commitment to:
- (a) ensuring transparency with our suppliers,
 - (b) staying mindful as to what steps can be taken where necessary to combat slavery, including forced labour, child labour and human trafficking, and
 - (c) enforcing effective systems and controls to prevent modern slavery from taking place in our business and supply chain.
- 4.2 The Code expressly states that Oppenheimer will not knowingly tolerate the use of forced, debt bonded, indentured labour, involuntary prison labour, slavery or human trafficking in its supply chain.
- 4.3 The Code also includes a whistleblower policy and anonymous breach reporting hotline for employees to report suspected Code violations. These reports are both reviewed by Oppenheimer's Talent and Culture department as well as independently by the compliance officers of our parent company, Dole plc. Appropriate action is taken to investigate any such reports and corrective action is taken in accordance with our policy requirements.
- 4.4 A copy of our Code can be found on our website at: <https://oppy.com/app/uploads/2024/05/oppy-code-business-conduct-ethics2024.pdf>.

5 Our due diligence processes

- 5.1 Oppenheimer seeks to do business with suppliers that have similar values, ethics and moral business practices, including those related to human rights. Oppenheimer will not tolerate any form of modern slavery and human trafficking within its supply chain.
- 5.2 Oppenheimer currently has in place the following processes to mitigate risks of forced labour and child labour in its supply chains:
- (a) We evaluate new and existing suppliers with site visits and credit checks to ensure all suppliers comply with our values and will not trade with any supplier who does not do so.
 - (b) We include, in Sales and Marketing Agreements concluded with produce suppliers, an obligation to comply with the industry standards set out in the Ethical Charter on Responsible Labor Practices published by the International Fresh Produce Association, a copy of which can be found at <https://www.ethicalcharter.com/english/>.
 - (c) We require our employees to adhere to the Code.
 - (d) We provide adequate protection for whistleblowers.
- 5.3 We are constantly in the process of reviewing and improving our approach to supplier due diligence with the aim of ensuring a more robust action plan to address modern slavery risks. Some additional processes currently being developed include, but are not limited to:
- (a) Risk assessment questionnaires to be requested from new and existing suppliers, the results of which will then direct us to whether and when further investigation is required. Included in that assessment will be the consideration of country-specific risks as well as the responses and evidence provided by the supplier in support of their questionnaire, such as any code of conduct that includes anti-child labour and forced labour provisions.
 - (b) Appropriate contractual obligations reinforcing Oppenheimer's and its suppliers' commitment to compliance with both internal policies and any modern slavery legislation.

- (c) Specific training on modern slavery, in addition to the current mandatory annual training on the Oppenheimer's Code of Business Conduct and Ethics which prohibits our own and our suppliers' use of forced labour and child labour. This training will be mandatory for those staff interacting directly with our suppliers and sourcing new products or services globally in support of our business, including our grower relations and produce category management teams.

6 Remediation measures

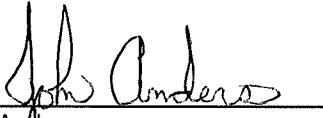
- 6.1 We have not discovered any instances of modern slavery in our business and supply chains. Therefore, we have not been required to take remediation measures and no remediation measures have led to loss of income to the most vulnerable families.

7 Effectiveness in combatting modern slavery risks

- 7.1 As Oppenheimer continues to explore and implement further measures to prevent and mitigate modern slavery risks in our operations and supply chains, we will develop a framework to enable us to assess our effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains.

8 Approval

- 8.1 This report is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes Oppenheimer's joint modern slavery report for the financial year commencing on January 1, 2023 and ending on December 31, 2023
- 8.2 This report was approved by the Board of Directors of Grandview Ventures Ltd. pursuant to subparagraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 24, 2024.
- 8.3 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.

By: 
John Anderson
Chairman, CEO and Managing Partner
Date: May 24, 2024

