



📍 834 Mersea Rd. 4
Leamington, ON. N8H 3V6
☎ 519-326-7589

Report

May 31st, 2024

To: Minister of Public Safety and Emergency Preparedness

From: Great Lakes Greenhouses Inc

Financial Year: January 1st, 2023, to December 31st, 2023

Great Lakes Greenhouses Inc is a company operating in Canada. We are a grower of Hydroponic Agriculture produce such as tomatoes, peppers and cucumbers. We sell and distribute to customers in Canada and the USA. Also, we purchase produce from companies in Canada, US, and Mexico. Great Lakes Greenhouses Inc hire domestic and offshore workers from Mexico, Jamaica and the Philippines.

In 2023, we have not much in written policy in relation to forced and child labour. The rules and guidelines in the offshore labour program such as the LMIA (labour marketing impact assessment) mitigate the risk of hiring forced and child labour. First, a register recruitment agency screens all applicants from foreign countries. Then a list of screened applicants are then given to us to choose from. Documentations such as passports, work experience, proof of identification with full name and date of birth are all reviewed before the workers are hired. No person under the age of 20 is hired. For local workers (Canada), an application process must be completed including full name, DOB, experience and proof of identification. No person under the age of 18 is hired.

For our supply chains, we purchase from different countries and domestically as well. In 2024, we have commenced a supply chain attestation questionnaire which is sent out to our vendors. It is mandatory for each of our vendors to fill out and return to us. Please see attached "Supply chain attestation against forced and child labour. "

In 2024, as part of our employee's training, we are educating our employees regarding forced and child labour.


Peter Najem, CPA
CFO



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BILL S-211

REPORT ATTESTATION

Reporting Entity: Great Lakes Greenhouses Inc.

Previous Reporting Year End: December 2023


In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the "**Act**"), and in particular section 11 thereof, I, the attesor named below, hereby attest that I have reviewed the information contained in the attached report for the Reporting Entity listed above.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the attached report is true, accurate and complete in all material respects for the purposes of the Act, for the Reporting Year listed above.

Attested to by me at Leamington, Ontario, on this 31st day of May 2024.

Printed Name: Peter Najem _____

Title: _____ CFO _____

Signature:  _____
I have authority to bind the Reporting Entity.



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POLICY AGAINST FORCED LABOUR / CHILD LABOUR

Approved By: Peter Najem

Approved Date: May 10th, 2024

Review Date: May 10th, 2024

POLICY STATEMENT

Great Lakes Greenhouses Inc. (the “**Company**”) is committed to maintaining strong ethical business standards across its operations. The Company expects the same commitment from all others that it conducts business with. In accordance with Canadian laws and regulations, the Company is continuously taking steps to ensure those involved in its Supply Chain are not involved in any form of illegal or unethical employment practices, including but not limited to, Forced Labour and/or Child Labour.

Further, as a producer of agricultural goods in Canada, the Company recognizes that it plays an important role in fighting against Forced Labour and Child Labour, and is committed to exercising reasonable care to ensure that it complies with *The Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c.9 (the “**Act**”), and all other applicable laws and regulations which monitor or enforce the prohibition against importing goods produced by Forced Labour and/or Child Labour.

PURPOSE

The Purpose of this Policy is to:

- a) adhere to the strict prohibition of the use of Forced Labour and/or Child Labour in the international and domestic supply chain;
- b) commit to avoiding any business or other relationships with any entity, supplier, purchaser, manufacturer, agent, or any other business, that uses or is suspected of using Forced Labour and/or Child Labour at any stage of their production process or their Supply Chain;
- c) establish an Attestation requirement to vet new and existing Actors for Forced Labour and/or Child Labour risks through questionnaires, inspections, audits, and by other means; and



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- d) establish a complaint process for commencing and conducting investigations and inspection audits, if necessary, and ceasing business with Actors if the Company concludes or has reason to believe that they or their subcontractors are using Forced Labour and/or Child Labour.

SCOPE

This Policy applies to the Company and its suppliers, contractors, subcontractors, and agents, and any other party who is engaging in business with the Company (collectively referred to as “Actors”).

POLICY

The Company will not support, condone, or conduct business with any entity that makes use of Child Labour or Forced Labour.

The Company requires that any Actor in Canada will comply with the laws of Canada. For any Actor operating outside of Canada, the Company requires that such Actors ensure that those individuals who are working within their Supply Chains are at least the Global Minimum Age and that they comply at all times with the relevant minimum age and labour laws of such jurisdictions.

Failure to comply with this Policy, or the refusal to sign the Attestation, will result in the Company ceasing to conduct business with the Actor. The Company will take all necessary and relevant steps to ensure that it ceases all current and future business with such Actor in a prudent and responsible manner, in keeping with its contractual and legal obligations.

REPORTING AND COMPLAINT PROCESS

If at any time Actors should engage in or become aware of Forced labour and/or Child Labour within their Supply Chain after signing an Attestation, they must notify the Company of the breach as soon as possible, and file and submit a new Attestation. Failure to notify the Company will be treated as a failure to comply. Where there is a suspected breach of the Act, or any other relevant legislation, the Company will comply with its legal obligations in reporting such concerns to the relevant legal authority.

DEFINITIONS

“Child Labour” is defined as labour or services provided or offered to be provided by persons under the age of 18 years and that (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada; (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (d) constitute the Worst Forms of Child Labour as defined in



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article 3 of the *Worst Forms of Child Labour Convention, 1999*, adopted at Geneva on June 17, 1999.

“Forced Labour” is defined as labour or service provided or offered under circumstances that (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

“Global Minimum Age” means the basic minimum age at which children can start working and is defined by ILO Convention No. 389 as being the age of 15. However, this may vary in accordance with a country’s institutions and development, as well as the level of hazard imposed by the working environment, and on the understanding that such country has complied with the applicable ILO declaration and approval processes.

“Supply Chains” is defined as networks of businesses, people, activities, information, and resources involved in producing or distributing goods or deliver services from a supplier to a consumer.

“Worst Forms of Child Labour” have been defined by the international community as hazardous work likely to harm children’s health, safety or morals, and slavery-like practices such as forced labour. The ILO Convention 182, *the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour*, was ratified by Canada in 2016 and forms the framework for outlining acceptable working conditions of all persons under the age of 18 years old. The convention also calls for the elimination of slavery or slave-like practices, including the sale or trafficking of children, or subjecting children to debt bondage or forced labour.

SUPPLY CHAIN ATTESTATION AGAINST FORCED & CHILD LABOUR

To assist Great Lakes Greenhouses Inc. (the "Company") in its commitments to eliminate Forced Labour and Child Labour, the Company requires each of its suppliers to respond to the following questions:

1. Do you certify that all materials that are incorporated into your products which are supplied to the Company comply with Canada's Federal laws and international commitments regarding Forced Labour and/or Child Labour, including but not limited to, those concerning modern slavery, human trafficking, worst forms of child labour, and debt bondage?

- Yes
- No. If No, Explain. _____

2. Do you certify that you do not use or condone illegal or unethical employment practices?

- Yes
- No. If No, Explain. _____

3. Do you certify that all employees, contractors or labourers in your Supply Chain are, to the best of your knowledge, at least the minimum age as required by the Act?

- Yes
- No. If No, Explain. _____

4. If the answer to the above was 'No', do you certify that all employees, contractors or labourers in your Supply Chain are, to the best of your knowledge, over the minimum working age of the jurisdiction in which they are working?

- Yes
- No. If No, Explain. _____



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5. Do you certify that all employees, contractors, or labourers are paid at least the minimum wage of the jurisdiction in which they are working and are paid for their labour at least monthly?

- Yes
- No. If No, Explain. _____

6. Do you currently have a policy or program in place to ensure that Forced Labour and/or Child Labour does not exist in your operations and supply chain?

- Yes
- No. If No, Explain. _____

7. Do you have policies regarding the minimum working age and minimum wage of all employees?

- Yes
- No. If No, Explain. _____

8. Do you have established and actively enforced company standards on Forced Labour and/or Child Labour for all employees, labourers, and contractors, particularly those who are in charge of Supply Chain management?

- Yes
- No. If No, Explain. _____

9. If the answer to the above question was 'Yes', do you assert that all of your employees, labourers and contractors, particularly those who are in charge of Supply Chain management, have been trained to understand the company standards as established above and how to mitigate the risk of certain factors in your respective Supply Chains?

- Yes
- No. If No, Explain. _____

10. Do you employ Temporary Foreign Workers ("TFW")?

- Yes
- No.



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11. If the answer to question 10 is 'Yes', do you have a policy on ethical recruitment practices to ensure that TFWs are protected from Forced Labour and/or Child Labour?

- Yes
- No. If No, Explain. _____

ATTESTATION

I, the undersigned, hereby acknowledge and confirm that, to the best of my knowledge and belief, (a) the above information is accurate and true; (b) the below noted company operates in compliance with the Act; and (c) the below Noted Company will abide by all of the terms, conditions, and principles outlined in the Company's Policy Against Forced Labour and Child Labour.

Company Name: _____

Representative Name: _____

Representative Title: _____

Representative Signature: _____

Date Signed: _____