



11729 River Line, Thamesville, ON | 519-692-3477 | greenhillproduce.com

FLIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

2024 REPORT

This report constitutes the first report prepared by Greenhill Produce (Thamesville) Ltd. (“Greenhill Produce”) under Canada’s new **Fighting Against Forced Labour and Child Labour in Supply Chains Act** (the “Act”). The Act aims to combat forced labour and child labour within the supply chains of goods imported into Canada.

This report outlines the steps taken to prevent and reduce the risk that forced labour or child labour in any step of good imported into Canada by Greenhill Produce (Thamesville) Ltd. The report will be published annually to chronicle our ongoing journey to protect human rights and reduce the risk that forced labour or child labour is being used in Greenhill Produce (Thamesville) Ltd. operations and supply chains.

Structures, Activities and Supply Chains

Greenhill Produce was founded in 2000 with a six-acre hydroponic greenhouse growing red, yellow, and orange sweet bell peppers. It is an incorporated company, located in Thamesville, Ontario. Over the last 20 years, Greenhill Produce has expanded to over 150 acres of high-tech greenhouses spanning multiple locations growing sweet bell peppers. Although Greenhill Produce has grown over the years, it remains a family-run business with a focus on fostering culture and working together to overcome obstacles and challenges. On average Greenhill Produce employes approximately 300 employees each year, made up of locals and temporary foreign workers from Jamaica, Guatemala, and Mexico.

With an emphasis on efficiency and adopting modern technologies, Greenhill Produce has made significant investments in automation and robotics to ensure customers receive the highest level of food safety and maximum shelf life. Greenhill Produce is continuously adopting emerging technologies, automation, and robotics pushing the boundaries by consistently innovating processes and standards. Greenhill Produce sells sweet bell peppers to several distributors.

Greenhill Produce strives to work with suppliers, consultants and other third-party businesses who share our values of social, ethical, and environmental responsibility. Our main suppliers provide a wide range of goods and services, which include:

- Packaging Supplies
- Growing Materials
- Central Pack Equipment & Maintenance
- Greenhouse Equipment & Maintenance
- Janitorial Supplies



11729 River Line, Thamesville, ON | 519-692-3477 | greenhillproduce.com

Policies and Due Diligence Processes

1. Code of Conduct

Respect for human rights is a fundamental value. Greenhill Produce commits to supporting and promoting human rights that benefit our customers, employees, and the communities in which we live and operate.

When customers buy goods from Greenhill Produce (Thamesville) Ltd., we want them to be confident that those products have been produced under acceptable conditions in compliance with local and international standards. Compliance with these standards means the goods shall have been produced:

- Lawfully, through fair and honest dealing
- Without exploiting the people who made them
- In decent working conditions
- Without harming the environment

2. Supplier Code of Conduct

The above Code of Conduct document was used as the basis for the Supplier Code of Conduct as many of the same standards apply to Greenhill Produce suppliers.

It is expected that the business activities of Greenhill Produce (Thamesville) Ltd.'s vendors, suppliers and service providers follow all applicable international, national, and local regulations for labour, sustainability, and environment as they apply to their company.

3. Corporate Human Rights Policy

Greenhill Produce is a primary producer of greenhouse peppers for food consumption. Our principles include:

- Producing a nutritious and safe product for human consumption
- Treating employees and the supply chain equally fairly and without discrimination
- Promoting economic growth and safeguarding consumers' trust in our brand.

Greenhill Produce identifies all stakeholders, internal and external, as equal and entitled to human rights as outlined in the United Nations Guiding Principles (UNGPs). Safeguarding human rights and human rights defenders across the supply chain is recognized as fundamental.

Providing fresh and safe products is the first step of business at Greenhill Produce. We recognize that social accountability is necessary and includes both our locations and the suppliers/partners we work with. Protecting human rights within our organization can be achieved using an informed and dedicated team. To evaluate our suppliers, we request documentation for annual review.



11729 River Line, Thamesville, ON | 519-692-3477 | greenhillproduce.com

Forced Labour and Child Labour Risks

We foster collaboration with our suppliers, emphasizing the importance of upholding the highest standards of quality and ethics, as outlined in our comprehensive policies and codes of conduct. Together we strive to ensure that our practices align with ethical principles and contribute to a sustainable and responsible supply chain. We count on our management team to ensure processes' compliance and efficient prevention of risks.

- During the previous financial year, we conducted a comprehensive review and enhancement of our policies and procedures to strengthen our practices and address any potential gaps in our practices. Due diligence policies and processes were developed and implemented for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.
- The management team revised training materials to incorporate updated protocols and regulations applicable to Ontario workers.
- Grievance mechanisms were developed and implemented. All employees received mandatory training on this procedure in 2023 and new hires will be trained upon hire.
- Mandatory training and awareness materials on forced labour and/or child labour was developed and implemented for all employees at Greenhill Produce.

1. Among our personnel

We believe that the risk of forced labour or child labour among our personnel is small. Our management team oversees the application of our human resource policies. Our recruiting processes ensure compliance with the standards currently in force in Canada, where 28% of our personnel come from.

The remaining 72% of our workforce is hired on the Canadian Agricultural Stream Program. Greenhill Produce works with a third-party staffing company to hire these employees. The third-party staffing company completes in-depth interviews, evaluations, and age verifications of all employees.

2. Within our supplies chains

Recognizing the importance of ensuring ethical practices throughout our entire supply chain is essential. Currently, our procedures for assessing the risk of forced labour or child labour are primarily focused on the personnel at Greenhill Produce and immediate suppliers. While we maintain direct oversight over our production process, ensuring compliance with labour standards, we recognize the potential risks associated with the sourcing of packaging materials from external suppliers. Risk may also vary at different levels of the supply chain. Identifying and addressing the indirect suppliers may present challenges that require additional measures.

As we fulfill orders each season, we remain vigilant, actively engaging with our suppliers to uphold ethical standards through our supply chain. Furthermore, our direct engagement with customers, who come to us for our peppers, ensures transparency and accountability in every transaction. By continuously evaluating and reinforcing our supply chain practices, we strive to mitigate the risk of forced labour or child labour, fostering a sustainable and responsible approach to production.



3. Audits

In July of 2023, Greenhill Produce underwent a Social Compliance Audit to uphold the safety and well-being of our workforce, safeguarding them from exploitation. The audit was benchmarked against the ETI base code, comprising nine key principles: the freedom of workers to choose employment, respect for freedom of association and the right to collective bargaining, provision of safe and hygienic working conditions, prohibition of child labour, payment of living wages, prevention of excessive working hours, elimination of discrimination, provision of regular employment, and the prohibition of harsh or inhumane treatment.

Remediation Measures

During the previous financial year, no instances of forced labour or child labour were identified in our operations or supply chain. Consequently, no remedial actions were required. Should such incidents arise in the future, we will implement appropriate remediation strategies.

Remediation of Loss of Income

Greenhill Produce has carefully evaluated the impact of our actions to eliminate forced labor and child labor risks and determined that vulnerable families have not experienced any loss of income as a result. Our assessment confirms that the steps taken have been effectively implemented without negatively affecting the financial stability of these families. Consequently, no additional measures have been necessary in this area.

Training

Our Supplier Code of Conduct outlines expectations of supplier performance and educates suppliers on the prohibition against forced labour and child labour and how to report suspected human rights and other violations. Greenhill Produce requires this Code to be acknowledged prior to beginning a partnership with the supplier.

Greenhill Produce is committed to eliminating the risk of child labour and human rights violations by providing comprehensive training to all contractors regarding the company's expectations and policies.

We also train our own employees on forced labour and child labour; this training is mandatory and completed upon hire. All levels of employees receive this training, which was developed internally.

Assessment of Efficiency

Greenhill Produce has introduced certain measures over the last financial year aimed at reducing the risk that forced labour or child labour will be used in our activities and our supply chains. We have not yet taken any measure to assess the efficiency of these measures.



11729 River Line, Thamesville, ON | 519-692-3477 | greenhillproduce.com

Approval and Attestation

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 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 aspects for the purposes of the Act, for the reporting period listed above.

Full Name: Justin Geertsema

Title: Vice President

Date: May 31, 2024

Signature: 

I have the authority to bind Greenhill Produce (Thamesville) Ltd.