

ANTI-SLAVERY STATEMENT

Modern slavery – including but not limited to forced labour and child labour – and human trafficking are contrary to our Mission, Vision, Strategies and Values.

We do not tolerate slavery or human trafficking in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect our employees, contract workers to act with integrity and comply at all times with the law, regulations and rules that apply to the jurisdictions where we operate. If instances arise where these expectations are not met, we will review and respond.

Our farms that are directly and indirectly owned by Greenwood Mushrooms Development Corporation are located in Ashburn and Port Perry Ontario. We grow and harvest retail grade fresh mushrooms that are enjoyed in the communities and surrounding areas in which we operate. Greenwood Mushrooms Development Corporation operating companies include Greenwood Mushroom Farm, Windmill Farms Inc, Ontario Mushroom Farms.

We are committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act.

Risks of modern slavery in our operations and supply chain

We recognize we may be indirectly linked to the risk of modern slavery as a result of our business activities, and we are aware that certain sectors in our portfolios may pose a higher risk of modern slavery.

Windmill is a leading controlled-environment agricultural platform that produces and sells organic, premium-quality white and brown mushrooms across North America. Windmill produces compost used in the mushroom growing process from agricultural by-products such as straw and manure. Mushrooms are grown in indoor facilities and then harvested and packaged by Windmill employees, which are then delivered to customers. Windmill Farm's supply chain of raw materials used in compost and mushroom production as well as packaging supplies involves purchasing a broad range of goods and services from predominantly local suppliers. We engage international suppliers when purchasing farming equipment and for building materials in the expansion of our facilities. We identify, assess and monitor areas in our supply chain where there may be a risk of slavery and human trafficking. Our principal supply chain includes suppliers raw materials used in the farming of mushrooms, farming supplies, and farming equipment.

We employ workers at our Ontario farms under the Canadian Temporary Foreign Worker Program, which allows Canadian employers to hire foreign workers to fill temporary jobs when qualified Canadians are not available. This program is regulated through the *Immigration and Refugee Protection Act* and the *Immigration and Refugee Protection Regulations* and is administered in partnership with Immigration, Refugees and Citizenship Canada (IRCC) and the Canada Border Services Agency (CBSA). We recognize that temporary foreign workers are a

group that are more vulnerable to exploitation and risks of modern slavery. We have processes and controls around the hiring, onboarding, and employment process for temporary foreign workers to ensure that we are fully compliant with our obligations as an employer under the Temporary Foreign Worker Program. We foster a working environment where all employees are treated equitably and without bias, ensuring fair compensation and benefits.

Supplier Risk Management

We have a risk assessment and due diligence process in place for suppliers including confirmation that suppliers acknowledge compliance with our expectations. We risk assess suppliers at the inception of the business relationship, if a supplier or the industry in which they operate is flagged for human rights risk, they will be subject to enhanced due diligence. Our Employee Code of Conduct requires all employees and contract workers to report actual or possible misconduct and encourages employees to speak to designated employee advocates, their manager, Human Resources or any senior leader if they are aware of any infractions against company policies. Any possible infractions will be reviewed and handled immediately and dealt with appropriately.

Our Training

Understanding and complying with our policies is a condition of working at Windmill Farms, and employees and contract workers must complete our training course and acknowledgment annually. In 2023, members of the management team and individuals involved in the procurement of products or services from third parties received training on modern slavery and forced labour in supply chains. We intend to implement mandatory annual course to train all employees and applicable contract workers to look for indicators of violations of human rights.

Our remediation processes

Assessing our effectiveness

We assess our effectiveness to be appropriate for our business size and risk, but given the importance of this topic, we commit to continuous improvement of our processes.

Approval

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.”

Stephen Simpson
Director

May 31, 2024

A handwritten signature in blue ink, appearing to be 'SS', with a horizontal line extending to the right.

I have the authority to bind Greenwood Mushrooms Development Corporation.

Conclusion

Windmill Farms remains committed to preventing slavery and human trafficking from taking place in our businesses and in our supply chains. We will continue to review our policies, procedures and practices periodically to determine any enhancements we can make to help prevent modern slavery and human trafficking.