

1. Introduction

This Report is produced by Northfield Capital Corp. (“**Northfield**” or the “**Corporation**” or “**our**” or “**we**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”) and sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Corporation. This Report constitutes the first report prepared by the Corporation pursuant to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

2. Structure, activities and supply chains

Northfield is a publicly traded company incorporated under the laws of the Province of Ontario. Northfield’s Class A Restricted Voting Shares are listed on the TSX Venture Exchange under the symbol “NFD.A”. The address of Northfield’s registered head office is 141 Adelaide Street West, Suite 301, Toronto, Ontario, M5H 3L5.

Northfield is an investment company, with investment interests in resource, manufacturing and technology sectors. In particular, Northfield owns or has controlling interests in certain subsidiaries which carry on business as follows:

- o The Grange of Prince Edward Inc. operates a vineyard and winery in Prince Edward County, Ontario. Northfield Capital Corporations owns 56.7% of The Grange of Prince Edward Inc.
- o Distillery Network Inc. is a private company under the laws of the Province of Ontario and is currently in the growth and development stage of spirit distilling in Toronto, Ontario. Northfield Capital Corporation owns 57.6% of Distillery Network Inc.
- o 2756189 Ontario Inc., a wholly-owned subsidiary of Northfield Capital Corporation was incorporated for the purpose of managing corporate office expenditures.
- o Spruce Goose Aviation Inc. a wholly-owned subsidiary of Northfield Capital Corporation owns various aircrafts which are leases to True North Airways Inc. for the purpose of providing private chartered air services.

The Corporation as a well as the above noted entities each have limited employees and operation and operations are isolated to Ontario. Most of the limited products used by the Corporation (through its subsidiaries) are purchased in Ontario. It does however, purchase certain oak wine barrels from France. Also, Spruce Goose Aviation Inc. has purchased aircrafts from the US.

3. Policies, Governance and Due Diligence processes

Northfield has codes of conduct for employees and business partners, and a comprehensive governance framework required pursuant to the rules of the TSX Venture Exchange and prepared in accordance with Ontario securities laws best practices. Northfield strives to uphold the rights of customers and employees, as well as the many workers, including any migrant and temporary labourers, which it may hire for work at The Grange of Prince Edward Inc. through the Seasonal Agriculture Woker Program offered through foreign Agriculture Resource Management Services.

Northfield conducts limited due diligence on suppliers and has no reason to believe that there is risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere. See section 4 below for further details. Given the small scale of its operations and limited resources it does not believe additional steps are required at this time.

4. Steps to prevent and reduce risks of forced labour and child labour

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the high importance on respecting human rights while conducting our business activities everywhere we operate. We expect the same of our subsidiaries and business partners.

We view the risks of forced labour and child labour very low for our operations. However, in general terms, we took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- conducted a preliminary initial internal assessment of the risks of forced labour and/or child labour in our supply chains to enhance our supplier Third-Party due diligence process; and
- reviewed our due diligence process on our imports/acquisitions outside of Canada, which are limited, but included a review of modern slavery risks, with selected suppliers with the objective of testing the process and improving it as necessary.

5. Remediation Measures

Northfield's reporting mechanism for employees and or business partners to report ethical or legal violations, among other concerns, include a direct line of communication with the Board of Directors, who are identified on Northfield's website. Should a situation of non-compliance be identified, Northfield will work to develop and implement a corrective action plan to improve and remedy the situation.

6. Training

As applicable, Northfield's employees receive regular tailored training on ethical topics and our policies. When onboarding, employees are provided with an overview and training on our code of conduct and policies.

7. Assessing effectiveness

While we have not to date taken any formal actions to assess the effectiveness of our policies and procedures, we believe the risk is very low given the limited operations. However, as operations evolve and expand in the future, Northfield will continue to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains and if necessary adopt more formal processes.

8. Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity

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

I have the authority to bind Northfield Capital Corp.



Per: _____

Full Name: Robert D. Cudney
Title: President and Chief Executive Officer
Director of Northfield Capital Corp.
Date: 31 May 2024