



Modern Slavery Statement

This statement is made on behalf of Rubicon Organics Inc. (TSXV: ROMJ) (OTCQX: ROMJF) (“Rubicon Organics”, “Rubicon”, or the “Company”) and its subsidiary Rubicon Holdings Corp.. We are publishing this statement in accordance with *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)*. This statement summarizes the steps the Company has taken during 2023 to address the risks of forced labour and child labour is used by the Company or in its supply chain.

1. Introduction

Rubicon Organics is a licensed producer focused on cultivating and selling organic certified, premium cannabis. We are committed to a culture of honesty, integrity, and accountability, and we strive to operate in accordance with the highest ethical standards and all applicable laws and regulations.

2. Company Overview

Structure

Headquartered in Vancouver, British Columbia, Rubicon Organics Inc. exists under the laws of the Business Corporations Act (British Columbia) and its common shares are listed under the symbol “ROMJ” on the TSX Venture Exchange and under the symbol “ROMJF” on the OTCQX. Rubicon Organics has one wholly owned subsidiary, Rubicon Holdings Corp. (“RHC”) which is incorporated in British Columbia, Canada.

Rubicon Organics, through RHC, is a licensed producer under the Cannabis Act focused on providing premium organic certified cannabis for the recreational and medical-use markets in Canada. Rubicon Organics owns and operates a fully licensed 125,000 square foot high-tech greenhouse located on a 20-acre property in Delta, British Columbia.

Customers

The Company has direct supply agreements in place with the British Columbia Liquor Distribution Branch (“BCLDB”), the Alberta Gaming, Liquor and Cannabis Commission (“AGLC”), the Ontario Cannabis Stores (“OCS”), the Société Québécoise du cannabis (“SQDC”), Cannabis NB (“CNB”), the Yukon Liquor Corporation (“YLC”) and sells directly to Manitoba Liquor & Lotteries (“MBLL”), the Northwest Territories Liquor, Cannabis Commission (“NTLCC”), the Newfoundland Liquor Corporation (“NLC”), Nova Scotia Liquor Corporation (“NSLC”), and the PEI Cannabis Management Corporation (“PEICMC”). We have agreements with distributors in Saskatchewan who distribute the Company’s products to certain provincial distributors and retailers.

Rubicon Organics is focused on achieving industry leading profitability through its premium cannabis flower, product innovation and brand portfolio management, including three flagship brands: its super-premium brand Simply Bare™ Organic, its premium brand 1964 Supply Co™, and its cannabis wellness brand Wildflower™ in addition to the Company’s mainstream brand Homestead Cannabis Supply™.



Our Employees

Under our *Code of Business Conduct & Ethics* policy, employees of the Company must not only comply with applicable laws, rules and regulations but also must engage in and promote honest and ethical conduct and abide by the policies and procedures that govern the conduct of the business of the Company. The responsibilities of each employee include helping to create and maintain a culture of high ethical standards and commitment to compliance, and maintaining a work environment that encourages employees to raise concerns with management and promptly addressing employee compliance concerns.

We are committed to maintaining a fair and ethical workplace for all our staff, free of bullying, harassment, discrimination and violence. Our *Bullying and Harassment Policy* provides that employees must:

- Not engage in the bullying and harassment of other workers;
- Report if bullying and harassment is observed or experienced;
- Apply and comply with the Company's policies and procedures on bullying and harassment.

All forms of forced labour and any form of human trafficking would not be tolerated by the Company. We ensure compliance with all applicable employment legislation relating to employee recruitment and terms and conditions, including obtaining right to work evidence and ensuring that no staff are paid less than the applicable national minimum wage.

Our workforce includes Temporary Foreign Workers ("TFWs") from Guatemala that we recruit under Canada's Temporary Foreign Worker Program (TFWP). The TFWP allows the recruitment of Guatemalans through the Canadian government and the Guatemalan organization, Amigo Laboral, to address the skill shortage of Canada's agriculture sector. We are part of Government of Canada's Recognized Employer Pilot Program which is a program for employers that meet the highest standards for working and living conditions and worker protection.

Our Contractors

We use contract labour with the vast majority relating to farm labour to assist with peak times around harvests. We work with reputable contractors and assess if they are in good standing with Workers' Compensation Boards in Canada.

Supply Chain

We have performed a risk assessment of our supply chain and identified higher-risk areas in our supply chain where forced or child labour may occur. In 2023, for areas that we assessed as higher-risk, we further analyzed spend by vendor location including the specific locations of their manufacturing facilities. We engaged with certain suppliers where we procure materials sourced from higher-risk countries to assess their understanding of the Supply Chains Act and what policies they have in place. We look to build on these conversations in 2024 to further assess and manage the risk.

3. Training and Capacity Building

In 2023, we did not provide specific training on forced labour and child labour but are assessing training programs for employees involved in procurement and supply chain roles.



4. Conclusion

Rubicon Organics is dedicated to maintaining the highest standards of integrity and ethical conduct. Through proactive measures and ongoing collaboration with stakeholders, we are committed to preventing modern slavery and promoting human rights within our operations and supply chain.

A handwritten signature in cursive script, reading 'Margaret Brodie'.

Margaret Brodie, CEO

I have the authority to bind Rubicon Organics Inc

Date: May 31, 2024