

OVERVIEW

Legal name:	Westbrook Greenhouse Systems Ltd.
Financial Reporting Year:	November 1, 2022 – October 31, 2023
Business Number:	105627269
Entity Categorization:	<ul style="list-style-type: none">• Corporation that has a place of business in Canada, does business in Canada and has assets in Canada• Meets the following criteria for one of its two most recent financial years:<ul style="list-style-type: none">– \$20 million or more in assets– \$40 million or more in revenue
Sector/industry:	Manufacturing
Location:	Beamsville, Ontario

STEPS TO PREVENT & REDUCE FORCED LABOUR AND CHILD LABOUR IN OUR SUPPLY CHAINS

Bill S-211 came into effect on January 1, 2024, following the end of Westbrook’s previous financial year (November 1, 2022 – October 31, 2023).

During FY2023, Westbrook Greenhouse Systems did not take any formal actions to prevent or reduce the risk of forced labour or child labour in our supply. Over the past several months, we have focused on the following activities:

- Understanding Bill S-211 and how it applies to our business;
- Reviewing our supply chain to identify potential risks;
- Developing and implementing policies and processes for evaluating suppliers and managing risk.

We will report on our actions taken to address forced labour and child labour in our supply chain during FY2024 in next year’s report.

1. STRUCTURE, ACTIVITIES & SUPPLY CHAINS

a) Structure

Westbrook Greenhouse Systems Ltd. (“Westbrook Systems”) is a corporation and a wholly owned division of The Floral Group Limited, a privately owned corporation based in Beamsville, Ontario. Westbrook Systems is led by President, Raymond Bryer.

Westbrook Trailers, a wholly owned division of Westbrook Systems, is led by President, Will Vermeer.

Westbrook Systems (including Westbrook Trailers) employees 70 full-time employees in Canada.

b) Activities

Westbrook Systems engages in the following business activities:

Sales & Marketing:

Westbrook Systems promotes and sells custom greenhouse structures, greenhouse heating/mechanical systems, benches and other greenhouse fixtures to commercial and production greenhouses in Canada and the US. In FY2023 Westbrook Systems sold approximately 100 custom greenhouse structure projects and 21 heating/mechanical systems.

The Westbrook Trailers division promotes and sells light duty utility trailers for general and recreational purposes to mass market retailers in Canada and the US. Westbrook Trailers also sells trailer parts and accessories directly to consumers online. In FY2023 the Westbrook Trailers division sold approximately 8,500 trailers.

Design & Engineering:

Westbrook Systems designs and engineers custom greenhouse structures and greenhouse heating/mechanical systems to meet customer needs and local building code requirements.

The Westbrook Trailers division designs and engineers light duty utility trailers.

Procurement:

Westbrook Systems sources and purchases materials and parts for the production of greenhouse structures, as well as heating/mechanical system components and other greenhouse fixtures for resale to our customers.

The Westbrook Trailers division sources and purchases materials, parts and components for the fabrication of trailer parts and the assembly of utility trailers.

Production:

Westbrook Systems fabricates parts and greenhouse structural components from steel and aluminium using various presses, cutting machines and welding equipment, as well as trailer parts for the Westbrook Trailers division.

The Westbrook Trailers division fabricates trailer parts from steel and aluminium using various presses and cutting machines. The fabricated parts, along with purchased parts and components are assembled on an assembly line to produce a finished trailer.

c) Supply Chains

Westbrook Systems' Tier 1 suppliers are predominantly located in Canada and the US., with one greenhouse glass supplier located in China. Our largest suppliers by dollar value include suppliers of structural steel, aluminum, plastic film/polycarbonate and heating/mechanical systems components.

The Westbrook Trailers division's Tier 1 suppliers are predominantly located in Canada and the US, with two fastener suppliers located in China. Other Key suppliers by dollar value include Westbrook Systems (steel trailer parts), as well as suppliers of galvalume, trailer parts, axles, wheels and tires.

Please refer to the attached Supply Chain Map for Westbrook Systems and the Westbrook Trailers division.

2. POLICIES & DUE DILIGENCE PROCESSES

Westbrook Systems recognizes the importance of maintaining a robust policy framework to combat forced labour and child labor in our supply chains. We have developed and implemented the following policies and processes:

a) Human Rights Policy

Westbrook Systems' Human Rights Policy includes our commitment to ethical sourcing and addresses, among other topics, Freedom from Forced Labour and Child Labour and Expectations of Westbrook Systems' Supply Chain. Please see below for the full text of our Human Rights Policy:

Respect for human rights is a fundamental value of Westbrook. The Company is committed to conducting business in an ethical and responsible manner that respects the human rights of all employees and those of our customers, vendors and other business partners. The Human Rights Policy incorporates the principles of the Ontario Human Rights Code and the United Nations' International Bill of Human Rights. Human rights are fundamental rights and freedoms that all people are entitled to, regardless of race, nationality, ethnicity, language, religion, gender or any other protected status. In honouring this commitment, Westbrook seeks to prevent and mitigate adverse human rights impacts

in its global operations and remediate any adverse human rights impacts it may cause or contribute to.

It is every employee's responsibility to maintain a work environment that reflects respect for human rights and is free from discrimination and harassment.

Employment Equity

Westbrook is an equal opportunity employer and employs people without regard to race, ancestry, place of origin, colour, ethnic origin, language, citizenship, creed, religion, gender, sexual orientation, age, marital status, physical and/or mental disability or financial ability. All employment practices – from hiring to termination – are to be free of illegal discriminatory practices.

Diversity and Inclusion

Westbrook values and advances the diversity and inclusion of all employees and believes that the workplace should reflect the diversity of the communities in which we work and live. The company is committed to using an efficient, non-discriminatory and systematic method of recruiting, selecting, hiring, integrating and retaining qualified members of employment equity groups. Where and when appropriate, Westbrook will give current employees diversity training to ensure that the workforce is properly informed of diversity practices in the workplace.

Duty to Accommodate

Westbrook has a duty to accommodate an employee's request for accommodation to the point of undue hardship to the Company. Employees might make accommodation requests due to physical and/or mental disabilities or under any other protected grounds under the Human Rights legislation in the province of work. It is Westbrook's policy to respond to individual workplace accommodation requests in a timely, and confidential manner. Employees who indicate a need for workplace accommodation can expect Westbrook to treat them with dignity and respect. Employees who require accommodation are expected to inform their Supervisor Human Resources of the request for accommodation. Westbrook may require documentation from the employee to verify and assess an accommodation request. Information will be limited to the facts relevant to identifying appropriate accommodation alternatives.

There may be instances where the Company is unable to fulfill an employee's accommodation request. In this case, Westbrook will provide a written explanation to the employee requesting accommodation.

Freedom from Discrimination and Harassment

Westbrook strives for a workplace that is free from discrimination, harassment, or other forms of wrongful treatment. Workplace decisions are made without regard to personal

characteristics protected under applicable laws and Westbrook policy, including race, age, gender identification, sexual orientation, religion, disability or other protected grounds. The Company does not tolerate discrimination, harassment, or retaliation of any kind.

Freedom from Forced Labour

Westbrook prohibits the use of all forms of forced, bonded, indentured, or compulsory labor in its business operations and supply chain. While these practices may be present where business partners rely upon migrant workers and other workers who are particularly vulnerable to exploitation, the Company will take measures to conduct due diligence to assess and address risks of forced labour in its own operations and in its supply chain.

Freedom from Child Labour

Westbrook prohibits the use of child labour in its business operations and supply chain. In accordance with the ESA, the minimum age for employment at Westbrook is 15 years old. Workers under the age of 18 are permitted to work only under the following circumstances:

- outside of regular school hours or during school breaks;*
- in positions that do not expose them to hazardous conditions;*
- with appropriate supervision and training to ensure their safety.*

Any concerns related to the employment of minors, including issues of safety, compliance with labour laws, or inappropriate work assignments, should be reported to Human Resources immediately for prompt resolution.

Right to Just and Favourable Work Conditions

Every Westbrook employee deserves to be treated with dignity and respect and has the right to just and favorable working conditions. Westbrook's policies and practices reflect this conviction. The Company provides fair remuneration, benefits, hours and working conditions.

Right to a Safe Workplace

Westbrook is committed to protecting the health and safety of its employees and workers in the workplace as outlined in its Health and Safety policy. This policy is supported by provincial, national and global health and safety standards that detail the requirements to evaluate risks, implement controls, and comply with legal requirements to safeguard the health and safety of those involved in its operations.

Right to a Clean, Healthy & Sustainable Environment

Westbrook believes that all communities have the right to a clean, healthy, and sustainable environment, and is committed to respecting this right. Westbrook will maintain compliance with all applicable laws related to the protection of the environment.

Expectations of Westbrook's Supply Chain

All members of Westbrook's supply chain are expected to operate their businesses in a responsible and ethical manner, respecting human rights. The Company reserves the right to conduct due diligence to assess the human rights policies and practices of its supply chain partners and to discontinue business with those who do not meet its expectations for responsible, ethical business practices.

b) Supplier Survey

We have distributed a survey to all current Westbrook Systems (including Westbrook Trailers) suppliers to gain insight into their policies and procedures for combatting forced labour and child labour in their business operations and their supply chains. The data collected from this survey is used to identify potential risks and areas for further due diligence.

c) Supplier Code of Conduct

We have established a Supplier Code of Conduct that explicitly prohibits forced labor, child labor, and other forms of exploitation within our supply chains. All suppliers are required to return a signed copy of the document, signifying that they agree to uphold these standards. Where there is an indication that a supplier has violated our code of conduct, we will perform due diligence and determine an appropriate course of action to mitigate any risk identified.

d) Supplier Contracts

Where Westbrook Systems has entered into formal contracts with suppliers, these contracts are reviewed and revised (where necessary) to ensure that the contract terms align with Westbrook's policies and procedures to combat forced labour and child labour.

e) Due Diligence

We have developed due diligence procedures to identify and assess the risk of forced labor and child labor in our supply chains. These measures include periodic supplier evaluations, risk assessments, and site inspections/audits where necessary.

f) Supplier Onboarding

As Westbrook Systems engages with new suppliers, we will:

- Raise awareness of the importance of ethical sourcing practices;
- Require the supplier to complete a Supplier Survey to understand their current policies and practices with respect to combatting forced labour and child labour;
- Provide the supplier with a copy of our Supplier Code of Conduct, requiring them to adhere to our standards for ethical sourcing.

3. ASSESSING & MITIGATING RISK

a) Risk Assessment

To date Westbrook Systems has not identified any instances of forced labour or child labour within our supply chain.

On an ongoing basis, we take the following actions to assess the potential risk of forced labour and child labour in our supply chain include:

- Reviewing all existing and new suppliers against resource materials published by the US Bureau of International Labor Affairs, UNICEF and World Vision Canada to identify any Westbrook suppliers in regions or industries where there is a high risk of forced labour or child labour;
- Reviewing data collected from our Supplier Survey to identify suppliers who are aware of forced labour or child labour practices within their supply chain and/or who do not have policies or procedures in place to combat forced labour or child labour.

In the event that an instance of forced labour or child labour is identified, we will take immediate action. Depending on the nature and severity of the situation, this action may include notifying the supplier and allowing them an opportunity to rectify the situation to our satisfaction, taking remedial action or terminating the business relationship with the supplier.

4. REMEDIATION MEASURES/REMEDICATION OF LOSS OF INCOME

To date, based on our assessment, the risk of forced labour and child labour in our supply chains appears to be very low. Therefore, we have not implemented any remediation measures at this time. Similarly, we have not implemented any measures to remediate the loss of income to vulnerable families as a result of any measure taken to eliminate the use of forced labour or child labour within our supply chains.

In the event that we identify an instance of forced labour or child labour, it will be taken seriously and investigated promptly and, if warranted, remediation measures will be developed and implemented.

5. TRAINING

To date we have provided training to all employees involved in procurement (total – 4) on the issue of forced labour and child labour. This training was developed internally and covered the following topics:

- Definitions and examples of forced labour and child labour;
- Review of Westbrook Systems' Human Rights Policy;
- World regions/industries that pose the greatest risk for forced labour and child labour;
- Due diligence processes;
- Risk assessment and risk mitigation.

6. ASSESSING EFFECTIVENESS

In FY2023 we did not take any actions to assess the effectiveness of our efforts to combat forced labour and child labour. Going forward we will continuously monitor and evaluate our efforts to combat forced labor and child labor in our supply chains. This may include regular reviews of our policies and procedures, as well as assessments of our suppliers' compliance with our standards.

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 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.

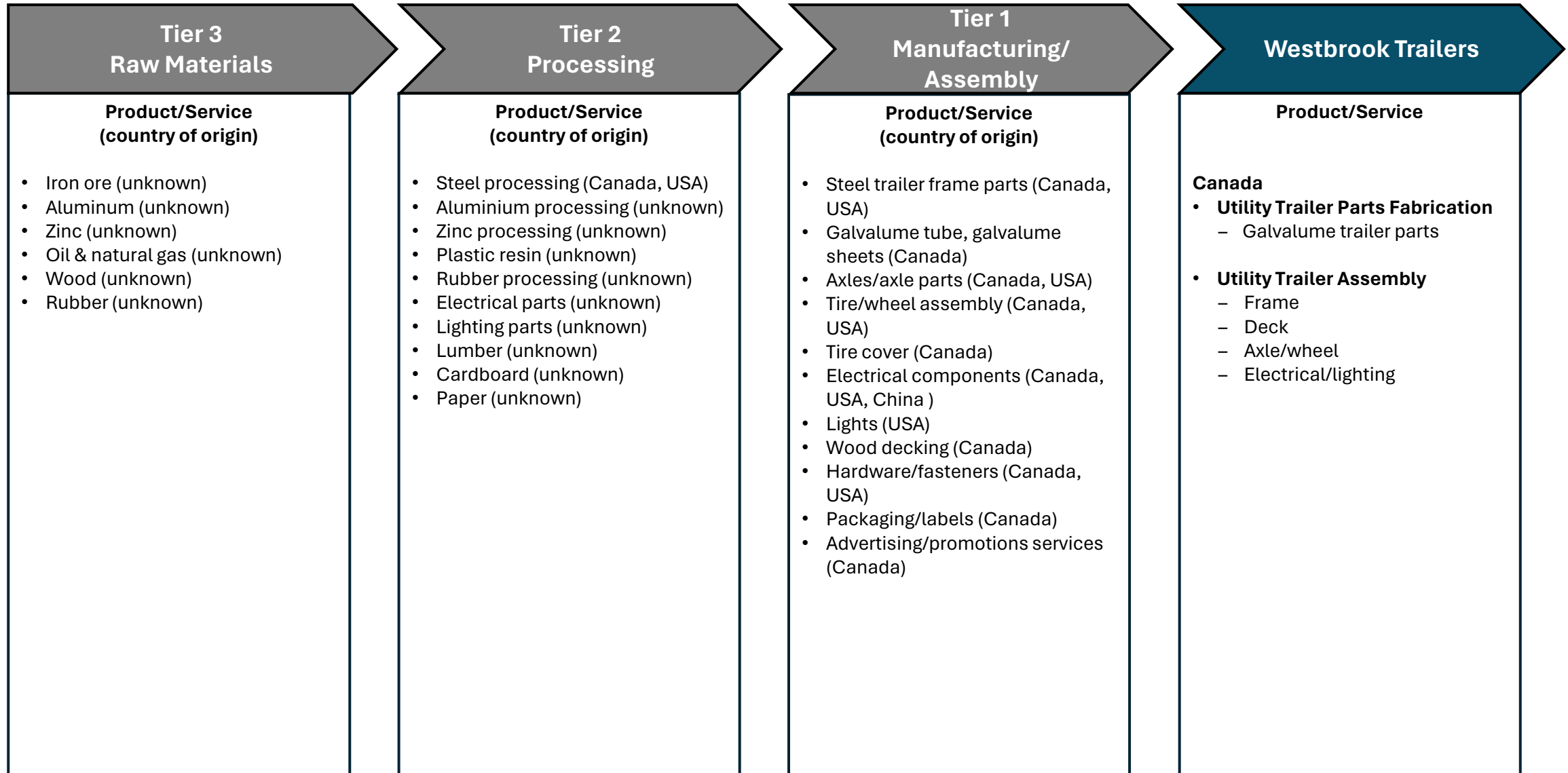
I have the authority to bind Westbrook Greenhouse Systems Ltd.

A handwritten signature in black ink, appearing to read "K. Reynolds".

Kristin Reynolds
Director, Human Resources
Westbrook Greenhouse Systems Ltd.
May 27, 2024

SUPPLY CHAIN MAP

Westbrook Trailers Division



SUPPLY CHAIN MAP

Westbrook Greenhouse Systems

