

Pure Flavor Farms LP

Modern Slavery Act Statement 2024



This document constitutes Pure Flavor Farms LP (hereinafter referred to as “Pure Flavor”) Modern Slavery Act Statement, covering our fiscal year of January 1, 2024 to December 31, 2024. This statement is made pursuant to Section 11 of Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act).

Modern slavery practices of any form, including forced labour and child labour, are contrary to Pure Flavor’s values and philosophy. We have zero tolerance for any form of forced labour or child labour in our operations and supply chain. We are committed to ensuring that all employees across our business and all our suppliers act ethically and responsibly as we work towards minimizing the risk of forced labour and child labour within our operations and supply chain.

Our Structure, Activities, and Supply Chain

Pure Flavor is the next generation of greenhouse vegetable growers who share a commitment to put quality, flavor, innovation, and consumers first while also providing a safe and respectful environment for all employees. Our passion for sustainable greenhouse growing, dedicated support for our customers, and commitment to conducting ethical business practices is built on a foundation drawn from generations of growing expertise.

We live our brand promise by supporting healthier lifestyles for consumers, communities, our partners, and our employees. Our company culture is built on the expertise and experience from our diverse and talented workforce comprised of full-time employees, part-time employees, contract employees, and temporary employees including foreign workers. We currently have over 1500 employees, approximately 45% of which are temporary foreign workers.

Pure Flavor’s Head Office is strategically located in Leamington Ontario. We grow, package, and distribute our high-quality produce to leading retailers and foodservice customers located across North America.

Our Facilities

Pure Flavor has five state-of-the-art greenhouse facilities located across Ontario and the United States. Through precise climate, irrigation, plant nutrition, and lighting controls, we can sustainably grow a variety of fresh fruits and vegetables year-round including tomatoes, peppers, cucumbers, eggplant, and strawberries. All our greenhouse operations offer on-site bunkhouses to accommodate our temporary foreign workers. The only exception to this is our Illinois, USA location where we rent housing units for our temporary foreign workers.

Strategically located in key regions throughout Ontario and the United States, our five distribution and cross-dock facilities serve as packaging operation centers to support our family of growers. Our distribution centers feature advanced packing automation allowing us to efficiently supply our produce to our customers. Our cross-docks are located near the Mexico/USA

border in Texas, as well as in Michigan, minutes away from the Canada/USA border. These facilities help expedite our product to customers in every region by providing temporary warehousing for product both entering and leaving Canada or the United States.

Pure Flavor is committed to ensuring that the safety of its employees, consumers, and environment are kept at the highest priority level throughout our operations. As such, we employ the highest and most rigorous standards of food safety and sustainability practices possible at all facilities including Good Agriculture Practices (GAPs) and Integrated Pest Management (IPM); with every greenhouse and distribution center inspected and audited on a regular basis.

Our Supply Chain

Pure Flavor's supply chain is a significant aspect of our operations and meeting our company objectives, values, and commitment to supplying sustainable greenhouse-grown produce across North America. As such, we understand the importance of, and ensure, that our suppliers share the same values and company objectives as Pure Flavor.

Our suppliers are made up of a variety of growers and vendors, which we engage with by means of a contract, consignment, or through the open market. They are primarily located across Canada, the United States, and Mexico.

Our supply chain includes sourcing of raw materials to grow our produce such as seeds and fertilizers, third-party sourced produce, equipment and parts for our greenhouses and distribution centers, packaging and office supplies, freight services, IT services, utilities,

and other materials and services to meet our business needs.

Our Policies and Due Diligence Processes

Pure Flavor believes that setting a standard for our employees begins at the top of the organization (Tone at the Top). We believe it is important to have information communicated in a clear and concise manner. To ensure effective communication, we have developed, and are continuing to improve, a suite of policies for our employees. This helps to ensure expectations are explicit regarding forced labour, child labour, modern slavery, and in general, human rights. These policies were established to promote a respectful and inclusive corporate culture and are available to our employees through our internal systems.

Standard Code of Conduct

Pure Flavor is committed to an operating philosophy and a Standard Code of Conduct that is based on fairness and concern for all people. This philosophy and our Standard Code of Conduct governs our relationships internally between all employees, and externally with suppliers and customers.

The goal of the Standard Code of Conduct is to reinforce a positive work environment where we all conduct ourselves appropriately and are treated with dignity and respect. The Standard Code of Conduct applies to all employees of Pure Flavor, including full-time, part-time, and temporary staff.

Establishing and maintaining our culture, and ultimately preserving a positive work

environment, is dependent on all employees living by our Standard Code of Conduct. Given the importance we place on this Code, employees that violate any of the standards set within will be subject to discipline, up to and including termination.

The Ontario Human Rights Code

The Ontario Human Rights Code, “the Code”, is an Ontario provincial law that states every person has a right to equal treatment without discrimination or harassment because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status, or disability.¹ Our management team is dedicated to complying in every aspect of the workplace environment and employment relationship including job applications, recruitment, training, transfers, promotions, apprenticeship terms, dismissal and layoffs. Pure Flavor prohibits any discrimination regarding rate of pay, overtime, hours of work, holidays, benefits, shift work, discipline, performance evaluations, and overall treatment during their employment.

Anti-Bribery Policy

The Anti-Bribery Policy describes how Pure Flavor is committed to the prevention, deterrence and detection of fraud, bribery, and all other corrupt business practices. We are dedicated to conducting our business with honesty, integrity, the highest ethical standards, and in compliance with all anti-bribery laws and regulations. This policy applies to all employees and communicates their obligations, and any disciplinary actions

should an employee be found to be engaged in fraud, bribery, or corruption.

Whistleblower Policy

The Whistleblower Policy’s purpose is to provide direction to the employees of Pure Flavor regarding the communication of real or suspected activities considered to be illegal, dishonest, or a violation of an important Company or public policy. The policy is intended to encourage and support an employee to report to their supervisor or Human Resources if they have knowledge of, or a concern of, illegal or dishonest fraudulent activity. The policy also provides protection to the employee regarding confidentiality and retaliation.

Remediation Policy

The Remediation Policy provides a framework regarding the management and remediation of real or suspected instances of modern slavery, including forced labour and child labour, in Pure Flavor’s operations and supply chain. The policy defines a set of principles which must be applied to every reported instance of modern slavery, whether suspected or real. This set of principles ensures that the remediation is victim centered, uses a case-by-case approach, ensures the victim has access to relevant third-party support, and ensures privacy and security of the victim.

Additionally, the Remediation Policy describes the process which must be taken for managing and remediating a real or suspected reported instance of modern slavery. The process includes details on how to investigate the claim, propose and

¹ <https://www.ohrc.on.ca/en/ontario-human-rights-code>

implement an appropriate remediation plan, and mitigate and prevent future harm.

Our Due Diligence

Proof of Age

To help prevent child labour from occurring in our operations, we have all employees sign the Proof of Age form upon being hired. In accordance with privacy laws, this form asks the employee to provide identification to Pure Flavor to examine, and in some cases, keep a photocopy of their proof-of-age identification with their last name blacked out and kept in their personnel file indefinitely.

The Ethical Trading Initiative – ETI Base Code

The ETI Base Code is an internationally recognized code of labour practices and was founded on the conventions of the International Labour Organization. This code includes standards on forced and child labour stating specifically, “employment is freely chosen” and “child labour shall not be used.”²

Pure Flavor uses this Base Code as a minimum and not a maximum standard. We comply with national and other applicable law and, where the provisions of the law and this Base Code address the same subject, we apply the provision which affords the greater protection.

Pure Flavor provides a copy of the ETI Base Code to all employees when they are hired. We obtain a receipt form that they are required to sign acknowledging they have received a copy of the ETI Base Code and are

aware that they may contact Human Resources at any time should they have any questions or concerns regarding the Base Code.

Supplier Audits

Many of our growers in Mexico, as well as Canada and the United States, complete third-party social compliance audits including Sedex Members Ethical Trade Audit (SMETA) and Fairtrade audits. These audits focus on four main pillars, namely Labour Standards, Health & Safety, Environment and Business Ethics. The scope of these audits was referenced against the ETI Base Code with a few additions. Pure Flavor retains a copy of the completed audits for our records.

Supplier Code of Conduct

Pure Flavor strives to procure materials in a manner that is ethical and with the utmost integrity. As such, the Supplier Code of Conduct sets out principles and expectations as to how our suppliers conduct themselves and their business dealings with Pure Flavor including: compliance with applicable laws and regulations, labour and human rights including modern slavery, health and safety, environmental responsibility, and data privacy. All our suppliers are required to adhere to the principles/requirements outlined in the Supplier Code of Conduct and sign the document for our records.

² <https://www.ethicaltrade.org/eti-base-code>

Our Forced Labour and Child Labour Risks

Pure Flavor does not tolerate forced labour or child labour. We aim to ensure forced labour and child labour are not being practiced by providing a safe environment which promotes raising awareness and concerns. We have policies in place to minimize the risk of forced labour and child labour from occurring within our operations or supply chain. As such, Pure Flavor considers the risk of forced labour or child labour occurring within our own operations to be low.

Pure Flavor has a comprehensive risk assessment and due diligence process for suppliers. It starts with gathering relevant data from our suppliers using our Supplier Self-Assessment Questionnaire (SAQ). This questionnaire is required to be completed by our suppliers annually or immediately after signing the Supplier Code of Conduct during the onboarding process. The risk assessment uses this data in combination with the latest global modern slavery data to create a risk profile for each supplier.

Any supplier who has a risk profile which has an unacceptable level of risk identified after a manual review is subject to enhanced due diligence. If the supplier fails to remediate or take reasonable due diligence actions, Pure Flavor holds the right to take additional mitigation actions which may include suspending or terminating the Supplier's relationship with Pure Flavor in accordance with applicable contracts and the Supplier Code of Conduct.

Pure Flavor considers the risk of forced labour or child labour occurring within our supply chain to be low given the results of our risk assessment.

Our Remediation Measures

Pure Flavor encourages all employees to report any actual or possible misconduct with regards to forced labour, child labour, or any of our policies to their manager, senior management, or Human Resources, so issues can be investigated and resolved quickly. Our Standard Code of Conduct explicitly states the expected behavior of all employees in the workplace, including following all company policies, and reporting any misconduct. Should any reports of real or suspected instances of modern slavery occur, our Remediation Policy outlines the principles and processes which must take place.

No reports have been made regarding the use of forced labour or child labour, and therefore no remediation measures were taken in 2024.

Remediation of Loss of Income

Pure Flavor recognizes that unintended consequences can arise because of eliminating and reducing the risk of forced labour and child labour including the loss of income to vulnerable families. Evaluating if a loss of income has occurred is a part of the remediation process outlined in our Remediation Policy.

We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Our Training

Pure Flavor understands the importance of proper training and implementation of our policies upon which establishing and maintaining our culture, and ultimately preserving a positive work environment, is dependent on all employees living by our Standard Code of Conduct. As such, we require all new employees to review and sign an acknowledgment that they have received the employee handbook, which includes our Standard Code of Conduct and all our other policies. Additionally, our orientation contains slides, videos, and other materials regarding indicators of violations of labour and human rights including harassment, health and safety, and proper working conditions.

Pure Flavor also launched our new Learning Management System which serves as a platform for all our learning and development initiatives, offering a wide range of courses and resources to help our employees grow both personally and professionally. Included in the platform is an ESG training course which is required to be completed by all employees and includes content on modern slavery risk in our operations and supply chains. Links to all relevant resources and policies were included in the course to ensure transparency and awareness.

Assessing Our Effectiveness

Pure Flavor seeks to avoid human rights violations, such as forced labour and child labour, within our operations and supply chain and are committed to upholding

standards and policies to help mitigate our risk of modern slavery occurring.

We have defined and started tracking key performance indicators (KPIs) to measure our effectiveness in ensuring that forced labour and child labour are not used in our activities and supply chain. These KPIs were developed using the data from our risk assessment and are reviewed annually following the completion of the risk assessment. Additionally, the KPIs will be compared to our 2025 fiscal year results to ensure that our efforts are having a positive impact and are aligned with business activities, regulatory developments, industry standards, and best practices.

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 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.

Marc Hill
Chief Financial Officer
May 29, 2025



I have the authority to bind Pure Flavor.