

2820853 ONTARIO INC.

621 Mersea Road 11, Leamington, Ontario N8H 3V8
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Re: Canada's Modern Slavery Act Statement Filing

Purpose of This Report:

This report highlights the actions of 2820853 Ontario Inc. has taken to ensure that no forced labour, child labour nor modern slavery exists at the 2820853 Ontario Inc. The report has been prepared pursuant to Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). The use of the words, "we," "us" refers to 2820853 Ontario Inc.

Our Company and Operations:

2820853 Ontario Inc. is based in Ontario where the head office is located in Kingsville, Ontario Canada at the same address of the operations.

We supply fresh produce including tomatoes, cucumbers and strawberries. We grow our own product and release custody of product to our customer. Our supply chains consist primarily of seeds and other growing supplies which we mainly purchase from Canadian suppliers.

Modern Slavery Risk Assessment and Mitigation:

To assess and mitigate risk, we undergo strict rules following Service Canada integrity guidelines, Employment Standards Act for both the greenhouse and packhouse and carry out Government audits. Currently some of our farms have begun to conduct Ethical / Social Compliance Audits that cover all our policies including, Labour Standards, Health and Safety Business Ethics and Environment. Using risk assessments and social audits from the certified ethical farms, this enables 2820853 to identify potential areas of risk and non-compliance in our operations. In our risk assessments we have not identified any cases of forced or child labour.

The agricultural sector carries an inherent risk for forced labour in supply chains. The risks are strongest in:

1. the use of agency workers and migrant labour; and
2. labour in field growing operations

Policies and Due Diligence Process in Relation to Forced Labour:

We operate strictly in accordance with the legislation in the countries in which we recruit from and our 2820853 Ontario Inc. Code of Conduct requires that our suppliers do the same. Our policies and protections for workers are regularly reviewed and as well we update them to provide additional protections to workers. Our policies include:

- Our Supplier Code of Conduct
- Our Employee Handbook and Policies on non-discrimination
- Compliance with local laws relating to Farm Labour Contracts

- Health and Safety Policies and Procedures
- Signed memo by the CEO and posted for all visitors

Our Due Diligence Includes:

- Service Canada government integrity audits
- Appropriate Social Compliance Audits including:
 - SMETA best practices and standard.

Audits will verify the worksite and any living accommodations to ensure that employment is freely chosen, child labour is not used, living wages are paid, working hours are not excessive, regular employment is provided, and no hard or inhuman treatment occurs.

- Review of all employee files verifying age of worker.
- Team of Human Resources trained by compliance on employee files, verifying age of employee.
- Updating the Supplier Code of Conduct and posted at every entrance to the farms.
- Feedback and Anonymous Reporting suggestion boxes.
- Reporting to JHSC members living within worker accommodations.
- Reporting by phone.
- Annual training conducted by Human Resources Compliance Manager to all Human Resources personnel.
- Recruitment verified by the Director of Human Resources.

Our employment practices that ensure no forced labour nor child labour is used include:

- No charging of recruiting fees
- No holding of paychecks or savings
- No holding of passports or other documents
- Freedom of movement and gathering
- Contracts translated into the contractor's language
- Reporting and tipline posters hung in bunkhouses at the farms
- Suggestion boxes, anonymous reporting.

- Confidential interviews with auditors
- Social Compliance audits that include confidential interviews with auditors.

Steps Taken in Prevention and Risk Reduction

Supplier Code of Conduct which forbids forced labour and child labour, signed by CEO.

Beginning to book all farms for SMETA/ Ethical compliance audits.

In 2025 Service Canada random audits completed on farms to verify recruitment and Ethical Audits being conducted for all farms.

Employee Training

All Human Resources are trained and assess labour and human rights risks or manage farm workers took 2820853 Ontario Inc. updated Code of Conduct training. This training is mandatory for employees working in these aspects of our business and conducted on a yearly basis.

Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families that Result from any Measures taken to Eliminate the Use of Forced or Child Labour in our Activities or Supply Chains

We have not identified any lost income for vulnerable families resulting from our measures taken to eliminate the use of forced or child labour in our activities and supply chain. Should we identify any instances of this nature in the future, we will investigate and consider remediation plans appropriate to the circumstances and in accordance with international standards. Remediation plan and policy in place at 2828053 Ontario Inc.

Effectiveness

2820853 Ontario Inc. did not find any instances of forced labour or child labour in operations or supplier operations in 2025. We continue to operate in accordance with our policies and best practices for labour, social compliance and health & safety. 2820853 Ontario Inc. has not yet taken any actions to assess the effectiveness of our policies and best practices and intends to do so at a later stage as per annual review protocols.

Communication and Reporting:

A copy of this Report is available in Public Safety Canada's Forced Labour in Canadian Supply Chains Report Registry at Public Safety Canada. Additionally, this Report is posted on the Mastronardi Produce website.


Attestation

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of 2820853 Ontario Inc.

In my capacity as Chief Executive Officer of 2820853 Ontario Inc., and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

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 2820853 Ontario Inc.

Signed by:
Per: 
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Name: Chris Mastronardi

Title: CEO

Date: May 7, 2026