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## **FORCED LABOUR IN CANADIAN SUPPLY CHAINS** **2023 FISCAL YEAR REPORT**

### **INTRODUCTION**

Nature Fresh Farms Sales Inc. and Nature Fresh Farms Inc. together form one of the largest independent greenhouse produce marketer and grower in Canada and is headquartered in Leamington, Ontario Canada.

For the purpose of clarity Nature Fresh Farms Inc. and Nature Fresh Farms Sales Inc. shall be referred to as Nature Fresh in the context of this joint report.

This joint report outlines Nature Fresh's processes and progress made towards preventing and reducing the risks of forced labour and child labour in the financial reporting year of 2023 and is the first version of this annual report.

### **REPORTING CONTEXT**

Nature Fresh Farms Inc. and Nature Fresh Sales Inc. are each corporate entities subject to the legal requirements in section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act) and are both part of the same corporate group with a common owner. This Joint Report is made pursuant to the Act and was approved by the sole Director of Nature Fresh, Peter Quiring on May 23, 2024.

### **OUR CORPORATE STRUCTURE AND BUSINESS ACTIVITIES**

Nature Fresh Sales Inc. was Incorporated in 2009 and is headquartered in Leamington, Ontario Canada at 33 Princess Street, Leamington, Ontario N8H 5C5. Nature Fresh Farms Inc. was created by amalgamation in 2007 and is located at 525 Essex Road 14 Box 400 Leamington, ON N8H 3V8. Nature Fresh currently comprises of a team of over 1000 Employees, and we grow, purchase, sell, and distribute fresh produce, including but not limited to tomatoes, bell peppers, cucumbers, and berries.



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Nature Fresh purchases greenhouse grown produce from Canada, USA and Mexico suppliers and markets and distributes that produce in Canada and USA to retail and wholesale customers.

## A. OUR SUPPLY CHAIN

Until this review exercise, Nature Fresh's supply chain risk analysis focused on the suppliers of goods and services that contribute to the final product, including packaging materials and procurement of fresh greenhouse grown produce. Our vetting of suppliers was governed mainly by ensuring that our suppliers met the standards set forth by the Global Food Safety Initiative (GFSI), by the Ethical Charter and by our customer requirements.

Going forward, suppliers of growing materials like substrate, clips, seeds, and conveyance equipment will be added to the supplier approval process. This addition made with the knowledge that some of these items may be sourced from higher risk global south countries.

## B. POLICIES AND DUE DILIGENCE

Our focus is to protect, respect and value all employees by following all employment laws, including those involving wages earned and hours worked. Violating those laws is not just a legal issue but goes against Nature Fresh's core values. Nature Fresh does not tolerate any form of forced labour, included bonded labour, indentured labour and slave labour, or human trafficking. Workers must be allowed to move around freely and leave their place of work when their shift ends. Nature Fresh does not tolerate the hiring of child labour under any circumstances.

Nature Fresh endorses the Ethical Charter of the International Fresh Produce Association, [Ethical Charter on Responsible Labor Practices](#), and in doing so, commits to workplace safety, respect for worker dignity, compliance with all applicable legal requirements and a commitment to building coordinated action across the industry on responsible labour practices.

Since 2019, as part of Nature Fresh's vendor onboarding process, vendors are provided with the 'Ethical Charter of Responsible Labor Practices Endorsement



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Document' for their review and signature. This document highlights the main principles of the Ethical Charter of Responsible Labor Practices, namely:

1. Respect for Laws at Work
  - a) Legal Compliance
  - b) Occupational Health & Safety
  - c) Wages & Benefits
  - d) Working Hours
  
2. Respect for Professional Conduct
  - a) Communication and Worker Protections
  - b) Ethical Recruitment
  - c) Management Systems and Continuous Improvement
  - d) Responsible Purchasing Practices
  
3. Respect for Human Rights
  - a) Employment is Freely Chosen
  - b) Freedom of Association
  - c) Humane Treatment and Non-Harassment
  - d) Non-Discrimination
  - e) Protection of Children and Young Workers

Nature Fresh asks the vendor to agree to implement and abide by the principles set out within. Implementation is tracked by our Compliance department.

### **C. FORCED LABOUR AND CHILD LABOUR RISKS**

Nature Fresh's greatest risk exposure to forced labour and child labour is through suppliers, and the primary sources of these risks come from procuring goods in higher-risk geographies and sectors. We recognize the potential risks of forced labour and child labour in our extended supply chain and the complexity and challenges in operationalizing modern slavery compliance.

We encourage our procurement department to seek growers/vendors from the global south who have implemented social responsibility certification.

Nature Fresh strives to continue to identify emerging risks.



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#### **D. OUR REMEDIATION MEASURES**

Nature Fresh has not identified any specific instances of forced labour or child labour, accordingly, no measures have been implemented to remediate any forced or child labour.

#### **E. LOSS OF INCOME MEASURES**

Currently, Nature Fresh has not identified any loss of income to be remediated, however, we remain dedicated to contributing and supporting local drives and donations to support the unhoused.

#### **F. REMEDIATION OF LOSS OF INCOME**

No measures have been taken by Nature Fresh to remediate the loss of income to the most vulnerable families as no loss of income has been identified.

#### **G. OUR TRAINING AND AWARENESS**

Nature Fresh currently has policies and due diligence processes in place related to forced labour and child labour. Nature Fresh provides mandatory orientation training to employees upon hire to educate workers and keep them informed with the laws and requirements regarding forced labour and child labour.

#### **H. ASSESSING OUR EFFECTIVENESS**

Nature Fresh has not taken action to assess the effectiveness in preventing and reducing the risk of forced labour and child labour outside our workplaces.



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## REPORT APPROVAL AND ATTESTATION

This report has been approved by written resolution by the sole director of each of Nature Fresh Farms Inc. and Nature Fresh Farms Sales Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in my capacity as the sole director of Nature Fresh Farms Sales Inc. and Nature Fresh Farms Inc., attest that I have reviewed the information contained in the Joint Report for the 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.

A handwritten signature in blue ink, appearing to read "Peter Quiring", is positioned above a horizontal line.

**Peter Quiring**  
Director

May 23, 2024

"I have the authority to bind Nature Fresh Farms Inc., and Nature Fresh Farms Sales Inc."

