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## **FORCED LABOUR IN CANADIAN SUPPLY CHAINS**

### **2025 FISCAL YEAR REPORT**

#### **INTRODUCTION**

Ruthven Greenhouse Construction, Vine Fresh Acres Ltd. and Lebo Farms Ltd. are in the construction and agriculture industry located in Leamington, Ontario Canada.

For the purpose of clarity Ruthven Greenhouse Construction Ltd, Vine Fresh Acres Ltd. and Lebo Farms Ltd. shall be referred to as RGC, Vine Fresh and Lebo in the context of this joint report.

This joint report outlines RGC, Vine Fresh and Lebo's processes and progress made towards preventing and reducing the risks of forced labour and child labour in the financial reporting year of 2024 and is the first version of this annual report.

#### **REPORTING CONTEXT**

RGC, Vine Fresh Acres Ltd. and Lebo Farms Ltd. 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 all operate with the same owners. This Joint Report is made pursuant to the Act and was approved by the Director of RGC ,Vine Fresh and Lebo, Jake Neufeld on April 24, 2026.

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

RGC, Vine Fresh Acres Ltd. and Lebo Farms Ltd. are all headquartered in Leamington ON Canada. RGC, Vine Fresh and Lebo currently comprises of a team of over 400 combined employees. RGC constructs greenhouses, while Vine Fresh and Lebo grow and sell fresh produce including English cucumbers, mini cucumbers, and a variety of peppers.

### **A. OUR SUPPLY CHAIN**

We regularly talk to all vendors about all laws and requirements as part of our policies. Making sure they adhere to all Company standards.

### **B. POLICIES AND DUE DILEGENCE**

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 RGC, Vine Fresh and Lebo's core values. RGC, Vine Fresh and Lebo do not tolerate any form of forced labour, bonded labour, indentured labour and slave labour, or human trafficking. RGC, Vine Fresh and Lebo does not tolerate the hiring of child labour any circumstances.

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

RGC, Vine Fresh and Lebo'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.

RGC, Vine Fresh and Lebo strive to continue to identify emerging risks.

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

RGC, Vine Fresh and Lebo have not identified any specific instances of forced labour or child labour, as such, measures have been implemented to remediate any forced or child labour. If an occurrence of child labour is identified, the child will be removed from the workplace and provided with viable alternatives. We will follow the UNGC ILO conventions 138 and Labour Convention 182.

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

Currently, RGC, Vine Fresh and Lebo have not identified and loss of income to be remedied, however, we are dedicated to contributing and supporting local donations and efforts to support the unhoused.

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

No measures have been taken by RGC, Vine Fresh and Lebo to remediate the loss of income to the most vulnerable families as no loss of income has been identified.

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

RGC, Vine Fresh and Lebo currently have policies and due diligence processes in place related to forced labour and child labour. RGC, Vine Fresh and Lebo provide mandatory training to employees upon onboarding to educate and inform about all employment laws and requirements regarding forced labour and child labour.

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

RGC, Vine Fresh and Lebo have not taken action to assess the effectiveness in preventing and reducing the risk of forced labour and child labour outside our workplace.

## REPORT 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 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.



**Jake Neufeld**

Chief Manager

April 24, 2026

“I have the authority to bind Vine Fresh Acres Ltd, Lebo Farms Ltd. Ruthven Greenhouse Construction Ltd.”