

This statement is made pursuant Bill S-211 An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”). It constitutes PRT Growing Services Ltd. (“PRT” or “the Company”) and its subsidiary, slavery and human trafficking statement in respect of the financial year ending March 31, 2024.

Modern slavery – including but not limited to forced labour and child labour – and human trafficking are contrary to our Purpose, Vision and Values. We do not tolerate slavery or human trafficking in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect PRT employees, contract workers and members of the boards of directors of PRT to act with integrity and comply at all times with the letter and spirit of the laws, regulations and rules that apply to PRT in the jurisdictions where we operate. If instances arise where these expectations are not met, we will review and respond.

PRT is dedicated to ensuring that the way we conduct our business reflects our values and our belief that everyone should be treated with dignity and mutual respect in an environment that is free from harassment and discrimination. We are committed to practices that combat modern slavery and human trafficking, and to working with and encouraging any suppliers to uphold the principles in this statement. Slavery and human trafficking are contradictory to our Purpose, Vision and Values. We do not tolerate slavery or human trafficking within our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect PRT employees, contract workers and members of the boards of directors of PRT and all its subsidiaries to act with integrity and comply at all times with the letter and spirit of the laws, regulations and rules that apply to PRT in all the jurisdictions in which we operate.

At PRT, we understand the unique responsibility of the private sector in these efforts and are committed to expanding our work to understand and address any modern slavery risks that may arise in the course of our business. If instances arise where these expectations are not met, we will respond in an appropriate manner.

### **Our structure, operations and supply chain**

PRT Growing Services Ltd is a Canadian company incorporated in the Province of Ontario with operations in Canada.

PRT is the largest grower of conifer seedlings for reforestation and afforestation in Canada, producing and supplying approximately 270M+ container grown seedlings annually for the Canadian market. We currently operate 16 Nurseries in Canada. Our typical growing cycle involves the following steps: Sowing (Jan-April), Thinning/Weeding (2-3 months post sowing), Harvest/Lift (Oct-Mar).

In Canada, in most cases, PRT is contracted to grow seedlings for customers. Customers provide the seeds and own the seedlings throughout the entire growing process. Customers are predominantly integrated forestry companies and provincial government bodies that require seedlings in order to meet government mandated replanting requirements. Customers do not own the underlying land on which they replant. Integrated forestry companies have timber licenses that allow them to cut, with a statutory requirement that they replant the site within a specific timeframe (typically 2 years). All seedlings in Canada are grown in 2’Lx1’Wx1’H containers (“Containers”) that have growing cavities of various sizes.

## **Our Framework and Policies**

We are committed to maintaining a fair and ethical workplace for all our staff, free of bullying, harassment, discrimination and violence. We prohibit the use of all forms of forced labour and any form of human trafficking. We are committed to conducting our business in a lawful and ethical manner.

Our Code of Business Conduct and Ethics and Anti-Harassment and Bullying Policies sets out guiding principles on professional conduct and establishes that in performing their job duties, PRT employees should always act lawfully, ethically, and in the best interests of PRT.

These policies are grounded in our purpose and values and sets out PRT standards and expectations for the behavior and business practices of our employees, contingent workers, directors, and officers. We revise these policies at least every two years. The current version of the Code includes a statement on our approach to human rights and ethical labour practices, and we expressly state our company:

- Complies with local labour laws and practices and maintains our own high ethical standards of worker treatment;
- Does not condone or use forced or child labour or engage in human trafficking or slavery; • Does not condone human rights violations;
- Engages workers on the basis of a recognized employment or independent contractor relationship in accordance with local law;
- Provides workers with clear information about wages and benefits before they are hired; and
- Respects workers' rights to associate freely, join or form unions or works councils, and bargain collectively in accordance with local law.

Our employees, contingent workers, directors, and officers are required to submit an acknowledgment that they have received and read a copy of these policies and understand their obligations to comply with the principles and policies outlined in it.

## **Our Due Diligence Process**

### **Group Risk Management**

We are committed to embedding human rights considerations into decision-making across the Company and into our policy and governance framework. The Audit Risk Finance Committee (“ARC”) of the Board of Directors oversees PRT’s risk management program. This program is intended to ensure our policies, procedures and control measures are adequate to manage risks and keep them within the limits of the Company’s risk appetite.

The Board of Directors is also responsible for ensuring that the risk management framework takes environmental, social and governance (ESG) risks into account so that they can be adequately identified, monitored and integrated into existing risk management processes. ESG criteria are integrated into PRT’s processes. The Human Resources group is mandated to ensure human resources management strategies and organizational culture are aligned with PRT’s ESG practices and strategies.

### **Vulnerable Groups**

Our workforce typically consists of both full time hourly and salaried employees (approximately 250 FTEs) combined with a much larger number of local seasonal hourly employees (900) and contract farm labour workers (400).

Modern slavery experts and leading nongovernmental organizations play a key role in helping us identify modern slavery risks associated with our supply chain and operations. While modern slavery can be found among any population, we recognize certain groups are particularly vulnerable, including:

- Domestic and foreign migrant workers;
- Contract, agency, and temporary workers;
- Refugees, asylum seekers, ethnic/religious minorities and displaced persons; and
- Young or student workers

### **Our Supply Chain**

We performed a supply chain mapping exercise to identify the material suppliers related to the most material categories of purchased goods. Our supply chain includes acquisitions from local, regional, national and international suppliers, primarily suppliers of agricultural inputs such as peat, fertilizer and packaging from local suppliers. We understand that some parts of our supply chain present a stronger need for focused efforts to assess and address modern slavery risk. We evaluated our supply chain to understand the highest risks to workers and prioritize our efforts. We evaluate these risks using internal and external data, and guidance from external stakeholders, including industry experts, civil society groups, and nongovernmental organizations. Our relationships with our suppliers and monitoring of their practices for modern slavery indicators also allow us to better understand our modern slavery risks. We look for modern slavery indicators that can suggest heightened risk, based on our understanding each product's production lifecycle, identifying the geographies where raw materials or production occurs and whether there are strong labour protection laws in place, presence of workers who are part of vulnerable populations, a supplier's failure to deliver on a promised term of employment, restriction of worker movement, a supplier's retention of identity documents, debt bondage indicators such as charging recruitment fees, and mandatory overtime. Where we lack adequate information to assess risk, we have sent a questionnaire to our suppliers to better understand their processes and controls to reduce the risk of forced and child labour in their supply chains. This data informs our efforts to respond to those risks.

PRT has not identified incidents of modern slavery or child labour and therefore did not take any measures to remediate forced labour or child labour. Consequently, there was no loss of income resulting from having to take the form of any remediation measures.

### **Training and Risk Awareness**

In 2023, through our external legal partners, we delivered a global risk awareness seminar to all employees in risk gatekeeping roles in Operations, Human Resources and Compliance.

The awareness training consisted of:

- The origins of S-211, its purpose, the legislative process and the current political context.
- Which businesses and organizations are subject to S-211.
- First steps for businesses to take in preparing to comply with S-211.
- Practical advice on reports under S-211

- Insights for businesses on managing forced labour and child labour supply chain risks

PRT recognizes that tackling modern slavery requires a continuing year-on-year commitment and will continue to undertake due diligence in our supply chain and review and improve procedures to help identify and prevent the risks of modern slavery or human trafficking.

### **Assessing our Effectiveness**

We assess our effectiveness to be appropriate for our business size and risk, but given the importance of this topic, we intend to continue to assess and refine key performance indicators to measure our success in operationalizing our commitments and continuously improve our approach to human rights

### **Our consultation and governance process**

In preparing this Statement, the PRT engaged with each of the reporting entities covered by this Statement, and with other entities it owns or controls. It also consulted with key areas of our organization to prepare this Statement, including Procurement, Human Resources, Corporate Finance and Administration and our ownership group. These teams operate across our enterprise, including across the subsidiaries to which this Statement applies. This consultation process has supported our enterprise-wide approach to modern slavery.

### **Attestation pursuant to section 11 of the Canadian Act**

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities subject to the Canadian Act. 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.



George So,  
May 31, 2024

I have the authority to bind PRT Growing Services Ltd.