



# 2024 ANNUAL REPORT

## Modern Slavery Act

### PURPOSE

This annual report for the 2024 financial reporting year has been created by Jem D International Partners LP, doing business as Red Sun Farms (“Red Sun Farms”) for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Act”).

### OUR COMMITMENT

Red Sun Farms continues to be committed to preventing and reducing the risk that forced labour or child labour is used at any step in its production or importation of goods in Canada.

### STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Red Sun Farms is an Ontario based partnership, headquartered at 2400 Graham Side Road, Kingsville, ON Canada, N9Y 2E5. Originally created in 2003, the partnership was formed so that two existing Canadian corporations, J-D Marketing (Leamington) Inc. and Golden Jem Produce Inc., each family-owned produce companies with decades of experience, could carry on business together under one entity. A third partner, Red Sun Farms Canada Inc., whose principals represent one of the partnership’s largest growers, was added to the ownership group in 2012.

Red Sun Farms endeavors to close the gap between growers, retailers, and consumers as one of the largest vertically integrated greenhouse produce suppliers in North America. We operate year-round programs focused on the production and distribution of fresh tomatoes, cucumbers, and peppers.

Our supply chain includes a combination of related-party greenhouses, and contract growing partners operating in Canada, the United States, and Mexico. Red Sun Farms distributes product through multiple cold storage facilities strategically located across both Canada and the United States, and we service a wide range of retail, wholesale, and foodservice customers.

### STEPS TAKEN BY RED SUN FARMS IN 2024

To prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada, Red Sun Farms maintained related policies and due diligence processes that were in force throughout the 2024 financial reporting year. These policies and processes helped to both directly and indirectly mitigate the risk of forced or child labour within its own internal organization and in its supply chain.

### POLICIES AND DUE DILIGENCE PROCESSES

Red Sun Farms maintains several policies and processes which affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- (a) Implementing a Human Rights Policy (the “Policy”) which applies to all employees and contractors involved in Red Sun Farms’ operations across the produce supply chain. The Policy contains the following:
  - Red Sun Farms’ commitment to international forced and child labour standards such as the International Labour Organization’s Core Conventions.
  - An explicit prohibition on the use of forced labour, child labour, bonded labour, and/or involuntary prison labour in all of Red Sun Farms’ operations and supply chains.



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- A mandate to comply with all legal requirements regarding working hours.
  - A mandate to conduct regular human rights due diligence assessment to identify, prevent, and mitigate any potential human rights risks related to Red Sun Farms' operations and supply chains.
  - A provision to allow for accessible and transparent grievance mechanisms for all employees, suppliers, and stakeholders to report concerns related to any and all human rights violations.
- (b) Implementing a company-wide and confidential Ethics and Compliance Portal (the “**Portal**”), which is governed by Red Sun Farms’ “Ethics and Compliance Reporting Policy and Procedure.” This confidential, secure platform was designed to empower Red Sun Farms employees to report any concerns or potential violations of our code of ethics, and/or company policies, which would necessarily include any perceived or actual instances of forced and/or child labour.
- (c) Maintaining and utilizing a “New Hire Checklist” which mandates that all new employees provide Red Sun Farms with government issued photo identification.
- (d) Maintaining a recruitment policy which requires HR staff to review, verify, and retain a copy of an employee’s government issued photo identification.
- (e) Maintaining a Supplier Approval Letter of Guarantee (the “**Letter**”). The Letter explicitly asks produce suppliers if they are in compliance with the Act, and an answer is required for Red Sun Farms to approve the prospective supplier relationship.
- (f) Social compliance audits (“**SMETA**”) performed by partner farms in Mexico that makeup a majority portion of Red Sun Farms’ supply each year. The SMETA audit is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay, and forced and/or child labour.
- (g) Ensuring during onboarding that Mexican tomato growers have AMHPAC licences. AMHPAC has taken steps to address these issues and promote responsible labor practices among its members. This includes promoting compliance with labour laws and regulations, as well as international labour standards such as those set out by the International Labour Organization. AMHPAC has also worked with its members to raise awareness about the importance of respecting labour rights, including the prohibition of child labor and forced labor.
- (h) Ensuring that all relevant regulatory requirements in Canada are followed within the organization, including compliance with the *Employment Standards Act* (Ontario), *Criminal Code of Canada*, and all international labour standards.

### **FORCED LABOUR AND CHILD LABOUR RISKS**

Red Sun Farms has started the process of identifying risks of forced labour and child labour through its policies, processes, and procedures. It is aware that there may be higher risks associated with certain regions, goods, and industries.

### **REMEDATION MEASURES**

Red Sun Farms has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

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## REMEDICATION OF LOSS OF INCOME

Red Sun Farms has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any remediation measures for loss of income.

### TRAINING PROVIDED TO EMPLOYEES

In the 2024 reporting year, Red Sun Farms did not provide training to its employees specific to forced labour or child labour. Moving forward, it will be assessing what related training may be appropriate.

## ASSESSING EFFECTIVENESS

Red Sun Farms does not currently have specific policies and procedures in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its activities and supply chain. However, as outlined above, the policies and procedures that are currently in place do reduce the risk that child labour and/or forced labour is present in Red Sun Farms' activities and supply chain.

## 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 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

**IN WITNESS WHEREOF** the authorized signing officer(s) of Jem D International Partners LP have executed this report as of the effective date of the signatures set out below.

**SIGNED**

May. 26-2025  
Date

JEM D INTERNATIONAL PARTNERS LP

Per: [Signature]  
Name: Jim DiMenna  
Title: President

**I have authority to bind **Jem D International Partners LP****