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|  | Armstrong Top Pack Limited 500 County Road 18 Leamington, ON N8H 3V5 | |
| | Report | Revision 2 |

**Fighting Against Forced Labour and Child Labour in Supply
Chains Act**

S.C. 2023, c. 9

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Efforts to Comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act at Armstrong Top Pack Limited

This report outlines the measures Armstrong Top Pack Limited has taken, and continues to take, to combat forced and child labour within our supply chains. As a produce packing warehouse that receives and prepares for distribution greenhouse-grown peppers, cucumbers, and tomatoes across Canada and the USA, we are committed to ensuring that our business operations align with the highest ethical standards.

This report covers activities from January 1, 2025, to December 31, 2025.

Organisation Structure

Armstrong Top Pack Limited is the reporting entity for the purposes of this report. Armstrong Top Pack Limited’s direct activities include receiving, inspecting, grading, sorting, packing, storing, and preparing greenhouse-grown produce for distribution. Armstrong Top Pack Limited works with suppliers, service providers, and related companies that support the broader sourcing, sale, and movement of product. This report focuses on the activities and supply chains of Armstrong Top Pack Limited. Where related operational activities are described, they are included to provide supply chain context and do not imply that all affiliated companies are reporting entities under the Act.

Production

- Produce is grown by third-party greenhouse farms that operate independently from Armstrong Top Pack Limited.

Packing and Processing


- Upon arrival at Armstrong Top Pack Limited’s facility, produce undergoes quality inspection, grading, sorting, and packing according to customer specifications.

Distribution

- Packed produce prepared for distribution to retail and wholesale customers across Canada and the United States using company logistics operations and transportation partners.

Armstrong Top Pack Limited maintains relationships with a range of suppliers and service providers within its supply chain. These relationships may include:

- Long-term supply partnerships with greenhouse growers
- Contractual purchasing agreements for produce commodities
- Seasonal or spot purchases depending on crop availability
- Third-party logistics providers responsible for transporting goods

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- Both long and short-term partnerships with packaging suppliers

While the company performs its core packing and operational functions internally, certain functions may involve external partners, including:

- Transportation and freight services
- Agricultural suppliers providing produce commodities
- Packaging suppliers providing packing materials

These suppliers operate independently and are responsible for their own employment practices; however, Armstrong Top Pack Limited expects suppliers to operate in compliance with all applicable labour laws and ethical labour standards.

Commitment to Labour Standards and Ethical Practices

Armstrong Top Pack Limited employs 439 individuals and is fully committed to upholding the highest standards in labour practices by strictly adhering to the Employment Standards Act (ESA) and all applicable provincial and federal labour laws. Our policies and procedures are designed to prevent any form of forced or child labour while ensuring a safe, ethical, and inclusive work environment.


In support of the requirements outlined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act, the company has strengthened its internal reporting and accountability framework by implementing a formal Whistleblower Policy and a Grievance Policy. These policies provide employees with clear and accessible mechanisms to raise concerns related to workplace practices, including potential human rights violations. Both policies are formally implemented, included in annual training, and incorporated into the company's onboarding process to ensure all employees understand their rights and available reporting channels.

In addition, this report has been posted internally, referenced within the Employee Handbook, and all employees have been trained on its contents with signed acknowledgements confirming their understanding.

Prevention of Forced and Child Labour

The company has not identified any cases of forced or child labour within its operations, as it maintains strict policies and preventive measures, including:

- All employees are provided with detailed offer letters and job descriptions outlining their roles and responsibilities. Employees review and sign these documents before commencing employment to ensure mutual understanding.
- When promotions or role changes occur, new offer agreements are signed to clearly define expectations for both parties.

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- The company has several internal policies to promote ethics and transparency in its core business. It regularly reviews all policies and procedures to reflect its commitment to compliance with relevant laws and regulations.
- All employees receive an Employee Handbook at the start of their employment, which outlines company policies, including the Code of Conduct, Health & Safety (H&S) standards, ethical guidelines, and ESA-compliant provisions regarding wages, working hours, and rest periods. Employees sign an acknowledgment of receipt and understanding of these policies.
- The Employee Handbook now also includes the company's Whistleblower Policy and Grievance Policy, which provide structured processes for employees to report concerns confidentially, without fear of retaliation.
- All workers enter into employment voluntarily and are free to terminate their employment at any time.

Due Diligence and Monitoring


The company conducts due diligence through a variety of compliance initiatives to ensure ethical labour practices, including:

- SEDEX Members Ethical Trade Audit (SMETA) 4-pillar
- Verification that the company does not engage in or tolerate forced labour or child labour.
- Assessment of employee work-life balance, safety standards, and ethical practices.
- Confidential employee interviews to ensure an unbiased review.
- Service Canada Integrity audits and inspections are periodically conducted for Temporary Foreign Workers (TFWs).

Each employee is trained and encouraged to report any concerns to their supervisor, manager, Human Resources, or the CEO. For situations where employees may feel uncomfortable reporting internally, the company provides a third-party contact that is posted and accessible to all employees to ensure anonymity and protection from retaliation.

In addition, the Whistleblower Policy provides a formal process for confidential reporting of concerns, while the Grievance Policy provides employees with a structured process for addressing workplace issues or complaints. Both policies reinforce the company's commitment to transparency, accountability, and protection from retaliation.

The company adheres to a strict progressive discipline policy, ensuring that any substantiated complaints are addressed promptly. Investigations are conducted in a timely manner, with priority given to the protection of employees involved in the investigation.

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Ethical Recruitment Practices

To further safeguard against forced labour, the company adheres to the following practices:

- It prohibits the charging of any recruitment or placement fees to employees.
- Employees retain possession of their identification documents, passports, and work permits at all times.
- Paycheques are issued weekly without delay or deductions beyond legal requirements.
- For Temporary Foreign Workers (TFWs) who do not read or understand English, contracts are translated into their native language to ensure they fully understand the terms and conditions.

Annual Employee Training and Awareness

The company conducts annual employee training to maintain awareness of:

- Violence, Harassment, and Discrimination Prevention, ensuring a respectful and inclusive workplace.
- Promoting workplace safety and encouraging employees to report any hazards or concerns.

Maintaining a Healthy Work-Life Balance

The company prioritizes its employees' well-being by implementing policies that promote:

- Fair working hours and scheduled breaks in accordance with ESA.
- Open communication channels for discussing work-life balance concerns.

Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families Resulting from Efforts to Eliminate the Use of Forced or Child Labour in Our Activities or Supply Chains

To date, we have not identified any instances where vulnerable families have experienced lost income due to our measures aimed at eliminating forced or child labour in our activities or supply chains. However, should any such instances arise in the future, we are committed to thoroughly investigating the situation and implementing appropriate remediation plans, in line with international standards.

Company Culture

Armstrong Top Pack Limited seeks to maintain a workplace culture based on respect, inclusion, safety, and open communication. These values support the company's efforts to prevent forced labour and child labour by reinforcing fair treatment, accessible reporting channels, and accountability.

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Ongoing Commitment to Improvement

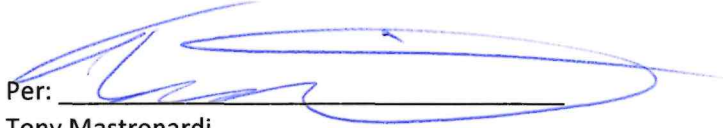
The company remains dedicated to continuous improvement in ethical practices. It regularly reviews and updates its policies, conducts internal investigations and external audits, and provides ongoing training to reinforce a culture of compliance and respect for human rights.

The company has developed a Supplier Code of Conduct and a Supplier Self-Assessment Questionnaire (SAQ) as part of its enhanced supplier due diligence framework. The Code of Conduct outlines expectations related to ethical labour practices, including the prohibition of forced labour and child labour, while the SAQ is designed to assess supplier compliance with these expectations, including recruitment practices, worker treatment, and adherence to applicable labour standards. The company has begun the process of communicating these requirements and will continue rolling them out to all suppliers, with expectations for acknowledgment and participation. Responses from the SAQ will be reviewed to identify potential risks and inform ongoing monitoring and corrective actions where necessary.

Approval and Attestation

This report was approved by the Board of Directors of Armstrong Top Pack Limited on behalf of itself, pursuant to section 11(4)(b)(ii) 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 Armstrong Top Pack Limited.

Per: 
 Tony Mastronardi

President
 Dated: May 27, 2026