Star Produce Ltd.

Fighting Against Forced Labour and Child Labour in Supply Chains – Bill S-211

May 2026

INTRODUCTION

Star Produce Ltd. ("Star") respects the rights of workers and complies with all applicable labour laws in the countries and jurisdictions that we operate. The use of any form of forced or unlawful child labour anywhere in our own operations or supply chain is prohibited. In addition, Star expects and is committed to ensuring that all contractors and suppliers refrain from the use of forced or unlawful child labour in their operations and logistic chains.

PART 1 - STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Star Produce Ltd. is an importer, grower, distributor, wholesaler and processor of fresh fruits and vegetables based in Western Canada. Star commenced business operations in 1989. Star's head office is located at 2941 Portage Avenue in Saskatoon, Saskatchewan. Star has additional sales offices located in Winnipeg, Calgary, Kelowna, and Surrey. In addition, Star operates distribution and packing warehouses in Surrey, Osoyoos, Calgary, and owns a 10-acre lettuce growing greenhouse facility in Coaldale, Alberta.

Star is licensed to import fruits and vegetables into Canada under the DRC (Dispute Regulation Corporation) which took over licensing from Agriculture Canada. All of Star's warehouse, growing, and distribution facilities are registered under the Safe Food for Canadians Regulations and our operations are overseen by the Canadian Food Inspection Agency (CFIA). Star utilizes a Global Food Safety Initiative (GFSI) food safety system across our facilities. Regular external food safety audits are conducted on all our facilities by the CFIA and various customer-based entities. The facilities also undergo internal and external Occupational Health and Safety, and Environment, Social and Governance audits. All freight services including trucking, vessel and rail are hired from independent carriers. Star conducts business in five (5) distinct divisions as set forth below:

THE OPERATING DIVISIONS OF STAR PRODUCE LTD.

a) **Star Produce Buy/Sell Division:** The Star Produce Division acts as an importer, wholesaler, and distributor of virtually all types of fruits and vegetables supplying both the retail and food service markets in Canada and the United States. The Star Produce Division also operates two large warehouses and distribution centres in Vancouver (Sun Processing) and Calgary (Galaxy Processing) which acts as storage, processing, and distribution facilities for all divisions in the Star Group. The Star Buy/Sell Division focuses on marketing table grapes, citrus, field tomatoes, tropical fruits, and melons of various varieties.

b) **Consolidated Fruit Packers Division (CFP):** The CFP head office is located in Kelowna, BC. CFP also operates a fruit packing shed in Osoyoos, BC. CFP represents numerous BC farmers and fruit packers and focuses on the sale of BC grown blueberries, apples, cherries, pears and stone fruit in Canada for export in the summer and import in the winter.

c) **Sliced FC Division:** Sliced FC purchases fruits and vegetables from its sister companies in the Star Group and washes, cuts, and packages the fruit and vegetables into ready to eat forms for both the retail

and food service markets in Western Canada. Sliced FC operates a high care cut floor in the Galaxy Processing building at 2626 Country Hills Blvd. Calgary, AB.

d) **BC Hot House Foods Division:** BC Hot House Foods Inc. offices are located in the Sun Processing facilities in Surrey, BC. BC Hot House Foods focuses on greenhouse grown products including tomatoes, cucumbers, peppers, eggplant, and strawberries. In addition, BCHH sources hot house grown produce supply from greenhouse growers and distributors in Canada, Europe, the United States, and Mexico.

e) **Whole Leaf Division:** Whole Leaf operates a 10-acre greenhouse in Coaldale, AB, growing approximately 15 million heads of lettuce a year. Whole Leaf also operates a 64,593 sq. ft. lettuce processing and salad making facility at 4956 – 52nd Street Southeast in Calgary, Alberta, under the name Inspired Greens. Whole Leaf sells whole head lettuce. Inspired Greens sells cut and washed lettuce in clamshell and bagged formats along with ready to eat salads to various retailers, and food service providers.

PART 2 – DESCRIPTION OF STEPS TAKEN TO PREVENT AND REDUCE THE RISKS OF FORCED OR CHILD LABOUR

The following are the steps taken by Star Produce Ltd. to prevent and reduce the risks of forced or unlawful child labour at any step of the production of goods in Canada or the import of goods into Canada:

- Star has developed Code of Conduct and Hiring polices that protect against and ensure that we do not hire individuals under the minimum working age outlined in employment standards in the jurisdiction of operation.
    - During the hiring process, Star requires identification, valid SIN numbers, and conducts a background criminal record check on all accepted applicants. This is a means of substantiating age and eligibility of our employees.
    - Star requires employees to return a signed employment agreement which lays out the terms and conditions of employment prior to commencing work. Employees have the ability to move freely and retain control over their personal identification documents at all times. This ensure we are not in any way engaging in forced labour.
- We are audited by numerous governmental and customer organizations with regard to food safety and labour practices. Star complies with all existing provincial and federal employment regulations. Star is Certificate of Recognition (COR) certified in all facilities in Alberta and are working towards COR certification in British Columbia.
- All of the farms we represent in Canada have to have formal food safety inspections completed yearly and be Canada Good Agricultural Practices (GAP) certified. The Canadian farms we represent are also all subject to provincial and federal employment laws.
- Star Produce has mapped our supply chain via country and commodity imported against the United States Bureau of International Labour Affairs ("ILAB") list of goods by supplying country, which lists goods it has reason to believe were produced by forced or child labour. We frequently visit growing, packing, and supplier facilities and have seen no indication of forced or unlawful child labour.
- All of our foreign suppliers are required to have yearly internationally recognized food safety audits and proper food safety certifications prior to being allowed to deal with Star.

- In addition to food safety certifications, Star has also begun to require our foreign suppliers of fruits and vegetables to sign a Supplier Code of Conduct where they certify that they comply with all local labour legislation and state that they will oppose or refrain from any form of human trafficking, forced or unlawful child labour.
- Star Produce offers mandatory training to specific employees detailing how to recognize the signs of forced or unlawful child labour.

PART 3 –SUPPLEMENTARY INFORMATION

POLICIES AND DUE DILLIGENCE PROCESSES

Star Produce is committed to identifying and responding to the real and potential adverse impacts of activities throughout our supply chain. Star Produce has embedded responsible business conduct into policies and management systems. Our Code of Conduct and Ethics policy addresses the business conduct we expect of our employees. Our Supplier Code of Conduct policy addresses the business conduct we expect from our suppliers. Our Hiring policy has specific provisions regarding child labour, forced labour and foreign labour. Site visits and external audits are conducted frequently to observe and identify any breach in our policies or procedures.

FORCED LABOUR AND CHILD LABOUR RISKS

Star Produce has considered the ways in which our activities and supply chains could potentially cause, contribute to or be directly or indirectly linked to actual or potential risk that forced labour or unlawful child labour is used in our supply chains. Star Produce has mapped our supply chain via country and commodity imported against the United States Bureau of International Labour Affairs (the "ILAB") list of goods by supplying country, which lists goods it has reason to believe were produced by forced or unlawful child labour. We are not aware of any violation of the Act in our supply chain. We have attended numerous times at our growing, packing, and supplier facilities and have seen no indication of forced or unlawful child labour being used.

REMEDIATION MEASURES

Star Produce has reviewed our supply chain and are not aware of any families that have experienced adverse impacts as a result of steps we have taken to eliminate forced or unlawful child labour risks. Therefore, no remediation measures have been taken to date. If adverse impacts as a result of our actions are discovered, Star Produce commits to investigating remedies for these adverse impacts for affected families to ensure that human rights harms are counteracted.

REMEDIATION OF LOSS OF INCOME

Star Produce has reviewed our supply chain and are not aware of any families that have experienced a loss of income as a result of steps we have taken to eliminate forced or unlawful child labour risks. Therefore, no steps to remediate loss of income have been taken to date. If a loss of income as a result of our actions is discovered, Star Produce commits to investigating remedies for this loss of income for affected families to ensure that harms are counteracted.

TRAINING

Star Produce offers mandatory training to specific employees detailing how to recognize the signs of forced or unlawful child labour. Star holds training with our employees who travel and instruct all of our employees when visiting supplier sites to be aware of any potential forced or unlawful child labour. If forced or unlawful child labour is observed, it is the expectation of Star Produce that the employee reports that to the company immediately. Star employees are made aware that we would immediately cease to do business with any suppliers who are in violation of local labour laws or engage in any form of forced or unlawful child labour.

ASSESSING EFFECTIVENESS

Star Produce assesses our effectiveness in ensuring forced and unlawful child labour are not being used in our activities and supply chains by regularly updating, reviewing and auditing the organization's policies and procedures related to forced or unlawful child labour.

Attestation –Star Produce Ltd. - FY2025 - Fighting Against Forced Labour and Child Labour in Supply Chains

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

- Deric Karolat
- Chief Executive Officer
- May 11th, 2026
- Signature . I have the authority to bind Star Produce Ltd.