

BILL S-211

[An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff](#)

Modern Slavery Statement for the Financial Year ended 2023

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by Bradford Greenhouses Ltd. to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing January 1, 2023 and ending December 31, 2023.

Bradford Greenhouses Limited is committed to fighting forced labour and child labour in our supply chains. To meet this commitment, the company continually monitors its structure, activities, and supply chains to assess and reduce risks associated with forced labour and child labour.

To further support this commitment, Bradford Greenhouses Limited has implemented an Illegal Labour Policy to establish a framework for managing related processes.

Group Structure and Activities

As a family-owned Canadian Controlled private corporation, Bradford Greenhouses Limited is owner-operated and is governed by a board comprised of four family members.

Structurally, Bradford Greenhouses is organized into four operating divisions (2 retail, 1 wholesale, 1 Corporate) that is supported by a corporate administrative group spread out across head office and division locations. Bradford Greenhouses Limited was incorporated in 1975. Bradford Greenhouses Incorporated was created in 2022, as a wholly-owned subsidiary of the parent company, Bradford Greenhouses Limited.

Our product offerings are diverse as we offer garden (annuals/perennials/soils/tooling) and lawncare products directly from our 2 retail locations directly to consumers. Our wholesale division sells plants and cuttings to both large retailers and smaller garden centers.

Supply Chain

Bradford Greenhouses sources its products and services from a wide range of suppliers. The supply base is highly concentrated in Canada but we also source from non-domestic countries such as China and Hong Kong, Denmark, Holland, and the United States.

Risks in Supply Chain

Bradford Greenhouses Limited is committed to fighting forced labour and child labour in our supply chains. To meet this commitment, the company will continually monitor its structure, activities, and supply chains to assess and reduce risks associated with forced labour and child labour.

Bradford Greenhouses Ltd.

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To further support this commitment, Bradford Greenhouses Limited has implemented an Illegal Labour Policy to establish a framework for managing related processes. Employees who may be exposed to instances of forced labour or child labour in supply chains will receive Illegal Labour Policy Training to inform them about the harm forced labour and child labour can cause, as well as provide the information and guidance necessary to notice or determine whether forced labour or child labour is used at any point in a supply chain.

- Identified risks in our supply chain
 - Use of seasonal labour in foreign plant production (cuttings and seeds)

Actions Taken

- Bradford Greenhouses Limited is firmly committed to protecting individuals from the exploitations of illegal labour practices, such as child labour, forced labour, slavery, and human trafficking; such practices are not tolerated by Bradford Greenhouses Limited and are strictly prohibited in all forms.
- Bradford Greenhouses Limited holds itself accountable to the highest ethical standards and will comply with and exceed all relevant and applicable local and international laws pertaining to illegal labour practices. In doing so, Bradford Greenhouses Limited never knowingly contracts with or carries on a business relationship with any organization or employer that does not adhere to the same standards or is in violation of any relevant or applicable labour laws.
- Bradford Greenhouses has not yet added language in supplier agreements, but we have created an attestation which we will start to send to our suppliers/vendors as follows:

Attestation of Compliance with Forced Labour Laws

(Vendor/Supplier Name) hereby attests and certifies that:

1. It does not, and will not, engage in or support any form of forced labour, including, but not limited to, child labour, bonded labour, debt bondage, involuntary prison labour, slavery, human trafficking, or any other form of coerced labour, as defined under Canadian law and international standards.
2. It ensures that all workers have entered into employment voluntarily and have the freedom to terminate their employment at any time without penalty, given reasonable notice in accordance with applicable laws and regulations.
3. It provides all workers with clear, understandable information about their rights and responsibilities, including terms of employment, wages, and working conditions, in a language they understand.
4. It does not retain any personal identification documents, financial guarantees, or deposits from workers as a condition of employment.
5. It complies with all applicable Canada labour laws and regulations, as well as international standards set forth by organizations such as the International Labour Organization (ILO).

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6. It maintains accurate and complete records of its employment practices and is prepared to provide such documentation upon request for auditing purposes by Bradford Greenhouses Ltd. (BGHL) or its designated representatives.

By signing below, (Vendor/Supplier Name) acknowledges and agrees to comply with this attestation and understands that any violation of these commitments may result in the termination of the business relationship with BGHL.

This attestation is valid for the duration of the business relationship between BGHL, its subsidiaries and (Vendor/Supplier Name), subject to periodic review and renewal as deemed necessary by BGHL.

Risk Assessment

Describe the policies in place in order to mitigate the risks identified above.

- BGHL has not completed any steps to identify risks to date (i.e. on-site audits, interviewing employees within the supply chain, annual questionnaires for supplier to complete).
- It is our intention to implement the vendor/supplier attestation

form.

Remediation

Describe any remediation measure in place to address the issues of forced/child labour.

- BGHL does not currently have any remediation plan in place should a forced/child labour be identified within a company.
- As noted in our Illegal Labour Policy, any reports of forced/child labour should be brought forward to the Human Resources Manager.

Training

- At this time, training has not been provided to employees regarding BGHL's Illegal Labour Policy, remediation, and identifying risks within our supply chain. Effectiveness Assessment
 - BGHL has not yet put in place any steps/methods to measure the effectiveness of our Illegal Labour Policy.

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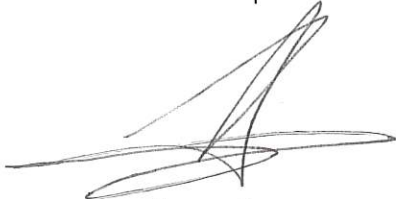
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Attestation

Date: May 28, 2024

Re: Attestation-Fighting Forced Labour and Child Labour in Our Supply Chain Report

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.



Len Ferragine
Treasurer, Owner | Bradford Greenhouses Ltd.

I have the authority to bind Bradford Greenhouses Ltd.

Bradford Greenhouses Ltd.

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