



Greenway  
Greenhouse  
Cannabis  
Corporation

# ***Fighting Against Forced Labour and Child Labour in Supply Chains Act Compliance*** **Annual Report 2026**

**Prepared By:**

Suzy D'Alimonte – Operations Manager  
Greenway Greenhouse Cannabis Corporation

**Approved By:**

Jamie D'Alimonte – Chief Executive Officer  
Greenway Greenhouse Cannabis Corporation

# Fighting Against Forced Labour and Child Labour in Supply Chains Annual Compliance Report

## Introduction

This report has been created in compliance with Bill S-211, *Chapter 9 An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff*. This report is submitted as a joint report on behalf of Greenway Greenhouse Cannabis Corporation. This report is required Under Part 2, Section 11, and will include the following information in compliance with Subsection 3 (a-g) of this Act as it relates to the entities subject to reporting:

- their structures, activities, and supply chains
- their policies and their due diligence processes in relation to forced labour and child labour
- the parts of their business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk
- any measures taken to remediate any forced labour or child labour
- any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour in its activities and supply chains
- the training provided to employees on forced labour and child labour
- how the entities assess their effectiveness in ensuring that forced labour and child labour are not being used in their business and supply chains

This report will include and/or reference supporting evidence from the previous fiscal year related to corporate efforts made by the reporting entities to prevent forced and child labour activities both internally and in our supply chain.

## Reporting Entity Information

This report applies to the following entity:

**Greenway Greenhouse Cannabis Corporation**

**Business Number:** 744878315

**TSX Ticker:** GWAY

**Sector:** Agriculture

**Reporting Year:** April 1, 2024 to March 31, 2025

## **Corporate Structure, Activities, and Supply Chain**

Greenway Greenhouse Cannabis Corporation is a publicly traded corporation located in southwestern Ontario. Operations of this company consists of the growing, cultivation, and sale of bulk cannabis to Canadian companies for further production.

Greenway employs temporary foreign workers through accredited programs to carry out general laboring duties related to primary plant production. Primary plant production is comprised of the growing, maintaining, and harvesting of a cannabis.

Greenway Greenhouse Cannabis Corporation is federally licensed for the activities as described in this report.

## **Due Diligence**

Corporate Policies have been created and implemented by Greenway Greenhouse Cannabis Corporation including but not limited to Policy # 048 Forced and Child Labour (see Appendix A, page 6-8).

The Forced and Child Labour Policy outlines company standards and which prohibits both forced labour and child labour, and supports only responsible employment practices. This includes ensuring that all employees hired are legally allowed to work in Canada and at our company, and that at no time in the course of their employment will any terms or agreements be made that puts any person in a position where their freedom to leave their employment is compromised.

## **Risk Assessment and Mitigation**

A Forced and Child Labour Risk Assessment has been conducted which addresses specifically ethical hiring practices and employment (see Appendix B, page 9). Forced Labour and Child Labour has been identified as very low risk. While it is possible that any company could practice unethical hiring and recruitment practices, forced labour and/or child labour practices, the probability is low if this occurring for multiple reasons.

Aside from implementing morally sound policies inspired by fundamental human decency, we aim to abide by Canadian and Provincial Legislation which prohibits activities that contravene the protection of persons and employees, where offenses of violating applicable laws are highly actionable. Both monetary and reputable damages are a risk to any company that would participate in forced labour and child labour activities with an impact of high severity, and therefore it is not in the best interest of the business to participate in these socially irresponsible business practices. Internally, the psychological damage to the working victims of

these practices, as well as the lowering of overall company morale, further add to the devastating loss a company could face.

Greenway Greenhouse Cannabis Corporation utilizes legitimate hiring techniques and platforms such as Indeed.com for job advertising, and reputable programs such as SAWP and FARMS for the hiring of temporary foreign workers. Employment contracts are provided to employees and agreed upon before the beginning of employment where age and legality is verified in the hiring process, and terms of employment are finalized and agreed upon mutually. Greenway Greenhouse Cannabis Corporation does not hire persons under the age of 19 years of age. No original documentation is retained by the employer, only copies of necessary identification is taken for record and is stored in a safe manner to protect confidentiality. Employees are free to leave employment at any time they so choose.

### **Remediation Procedures**

In the event that we find that the controls that we have in place have failed, and we have an incident of child labour, forced labour, and/ or human trafficking to address, it will be immediately reported to the authorities. While an investigation takes place, the companies understand that costs related to ensuring the safety and well-being of the person that has fallen victim to child labour, forced labour, and/ or human trafficking will be the responsibility of the employer. This could include a hotel room, food, clothing or any other basic needs that must be met until such time that the worker victim can be released from the employer's responsibility safely.

All employees are encouraged to report any complaints, either directly or anonymously, to ensure all issues are addressed. Complaints and reported violations will lead to an investigation and corrective action to ensure that this failure is not repeated moving forward.

### **Training**

Employees receive training on our labour related policies including but not limited to the Forced and Child Labour Policy upon hire. Refresher training is provided to all employees each year related to all areas of employment including but not limited to workers' rights and labour related policies. Greenway Greenhouse Cannabis Corporation is dedicated to effectively communicating information to all employees for the protection and well-being of all workers.

### **Verification of Effective Practices**

All policies and procedures are reviewed annually and revised as needed. The Forced and Child Labour Risk Assessment is to be reviewed annually as well. Consideration is given to reports and complaints from employees that may have been made in order to best revise any controls that

may show signs of inefficiency. There has not been any incidents of forced labour or child labour at Greenway Greenhouse Cannabis Corporation. Incidents of this nature would result in an extensive investigation, corrective action, and the implementation of more effective preventative measures to ensure that this incident is not repeated.

Furthermore, Health Canada conducts audits that assess multiple areas of the operation including but not limited to site personnel and company security. Health Canada conducts verification activities for all of our Good Production Practices (GPPs), including our Pre-employment and Termination Policy and Procedures, Security Policy and Procedures, and our Ethical and Unethical Business Conduct Policy. All activities in our operation have been verified to be in compliance with applicable regulations.

### **Action Plan**

Moving forward, Greenway Greenhouse Cannabis Corporation will continue to review and revise policies and procedures annually and as necessary, with a goal of continuous improvement. As the company continues to grow, we will ensure our commitment to ethical employment standards are met, by only using legitimate means, and reputable partners for hiring practices. We will do our part in the fight against Forced Labour and Child Labour, by assessing suppliers and other partners in the supply chain, as well as our internal personnel, and reporting any unethical practices to the appropriate authorities in accordance with our Policies and Procedures.

## Appendix A

Greenway Greenhouse Cannabis Corporation	 Greenway Greenhouse Cannabis Corporation	Policies and Procedures
<b>Corporate Policy Manual</b>		
Created: January 5, 2024 Revised: January 2, 2026	Created By: Suzy D'Alimonte Approved By: Jamie D'Alimonte	Policy # 048

### Anti-Forced/ Bonded Labour and Anti- Child Labour Policy

**Purpose:** To establish that Greenway Greenhouse Cannabis Corporation is committed to ensuring all workers hired are legally permitted to work for our company, of appropriate age as required by law, and are working at our company of their own free will. This policy is written in compliance with 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*, as well as any and all application laws and regulations related to Forced Labour and Child Labour.

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**Scope:** This policy applies Greenway Greenhouse Cannabis Corporation.

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#### Definitions:

**child labour:** means labour or services provided or offered to be provided by persons under the age of 19 years and that:

- (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999. (travail des enfants)

**forced labour:** means labour or service provided or offered to be provided by a person under circumstances that:

- (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- (b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930. (travail forcé)<sup>1</sup>

<sup>1</sup> <https://www.parl.ca/DocumentViewer/en/44-1/bill/s-211/royal-assent#:~:text=This%20enactment%20enacts%20the%20Fighting,them%20or%20in%20their%20supply>

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**Bonded Labour:** Labour that is forced upon a worker or demanded from a worker in order to repay a loan or other type of debt.

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**Forced Labour Policy:**

- All employees that apply to and work for Greenway Greenhouse Cannabis Corporation are hired following a process of application of their own free will.
- Temporary Foreign Workers are hired through a reputable program approved by governing entities, including SAWP and FARMS.
- Workers maintain control of all personal possessions and documentation including but not limited to legal documents, passports, licenses, and visas.
- There is no deduction from any worker's pay or retention of original documentation or property related to recruiting fees or otherwise, compelling workers to remain employed by the companies.
- Supervisors, managers, and company owners are prohibited from intimidation, discrimination, psychological abuse or tactics, or physical abuse or tactics, and cannot force a worker to remain at work or employed by the companies.
- All wages, deductions, loans and/or pay advances are disclosed and agreed up with the worker in writing, and are in compliance with Canadian and Ontario Laws. Terms of loans or pay advance repayments will be managed in a manner that does not bound the worker to the employer.
- Workers will not be forced to work, forced to stay employed with the companies, or be obligated to remain in the facility or under the company's employment.
- Bonded Labour and Prison Labour is prohibited at the company.
- The companies will verify upon hiring that each person hired is legally allowed to work for the companies, and has not been subject to slavery or human trafficking.
- If slavery or human trafficking has been suspected, the companies will call the local authorities to ensure an investigation may be conducted, and the person receives the assistance required to ensure their safety.

**Child Labour Policy:**

- No person under the age of 19 shall be hired for full-time employment. Full-time employees will be compensated in accordance with Ontario Employment Standards, and trained in accordance with the Occupational Health and Safety Act, R.S.O 1990.
- All employees are to be screened and approved by management, where employment contracts will be agreed upon between company and employee prior to the employee's start date.

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- Employees are required to provide proof of working eligibility such as a SIN number for payroll purposes, a working VISA or proof of status, Photo Identification, and/or any other verification as requested at the discretion of the company. Employees must register appropriately in order to gain employment with the companies listed in the scope of this policy.
- If Child Labour is found within the workforce, intervention and investigative measures will be conducted immediately, and the company will seek resolution in the best interest of the Child. The appropriate Authorities will be contacted, and corrective action following the investigation and root cause analysis of the event will apply. All measures taken will be documented.
- Corrective actions include but are not limited to:
  - Ensuring the child discontinues work
  - Verifying age, home and family
  - Ensuring child is reunited with family and/or relatives/community if this is a safe option
  - The development and implementation of a remediation plan considering the needs and desires of the child and their family
  - Ensuring the child has monetary provisions equal to their current wage, or legal minimum requirements for employment, whichever is higher, up until a date when they are no longer a child
  - Provide support through access to education, connection to an organization to offer counselling, health services or any other necessary services to ensure the welfare of the child.
  - Explanation of the legal requirements and restrictions on working ages of children and assurance, if they wish, they will be reemployed when they reach age, if applicable.
  - Ensuring that no child found working at Greenway Greenhouse Cannabis Corporation will be disrespected, discriminated against, or threatened during the process of remediation.

These protocols are implemented completely, and monitored by management for each company listed in the scope of this policy.

**Conclusion:** Greenway Greenhouse Cannabis Corporation strives to adhere to all applicable governing laws, in order to ensure that our companies follow strong ethical business and social practices.

**Responsibility:** Company Owners, Senior Management, Health and Safety Department

**Frequency:** This policy is reviewed annually unless otherwise necessary.

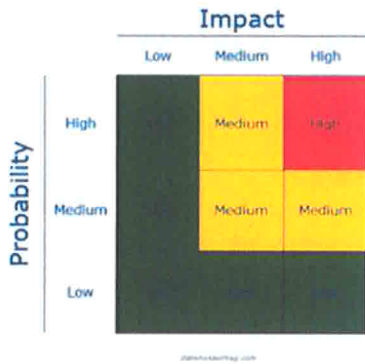
Changes Tracking		
Details of Change	Reason for Change	Date of Change
Added the definition of Bonded Labour	Discovered need for clarification during annual review.	Jan. 3, 2025

## Appendix B




### Greenway Greenhouse Cannabis Corporation Forced and Child Labour Risk Assessment

Identified Risk	Impact	Mitigation	Probability	Risk Score
<ul style="list-style-type: none"> <li>Unethical hiring and recruitment practices may include use of child labour, use of prison labour, discriminatory hiring practices, hiring illegal workers, "off-the-books hiring", and/or participating in any slave trading or slave labour activities.</li> </ul>	<ul style="list-style-type: none"> <li>Severe Impact.</li> <li>Child, prison, and/or slave labour is a severe violation of the worker's human rights, and devastating to their well-being, development, and/or physical and mental health.</li> <li>Legal and financial consequences as a result of unethical hiring and recruiting severely impacts the business and all employees.</li> <li>Legal and financial devastation of a company can result, should authorities investigate and confirm that these practices have taken place.</li> <li>Allowing for underage employees to access product carries additional legal/ criminal ramifications.</li> <li>Business and community reputation would be impacted, loss of partnerships.</li> <li>Lower company morale.</li> </ul>	<ul style="list-style-type: none"> <li>Management utilizes legitimate hiring practices through web-based job advertising, (i.e., Indeed.com).</li> <li>Advertised/ Policy that we are equal opportunity employers. (See Accessibility Policy and Hiring Policy).</li> <li>Temporary Foreign Workers are hired through a legitimate third-party company, (i.e., FARMS, SAWP), where it is confirmed that workers are legally allowed to work in Canada.</li> <li>Required Personnel GPPs and Security GPPs audited by Health Canada verifies compliance.</li> <li>Contracts provided.</li> </ul>	<ul style="list-style-type: none"> <li>Low</li> </ul>	1



Approved By: Suzy D'Allimonte  
Print Name

  
Signature

Operations Manager  
Title

Date: January 2, 2026

Reviewed: January 3, 2025

## Approval and Attestation

**This approval and attestation apply to the following entity:**

Greenway Greenhouse Cannabis Corporation  
1478 Seacliff Drive  
Kingsville, ON  
N9Y 2M2

Reporting Year: April 1, 2024 to March 31, 2025

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In accordance with the requirement 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.

Jamie D'Alimonte

Name (Print)

Chief Executive Officer

Title

January 2, 2026

Date

  
\_\_\_\_\_  
Signature – I have the authority to bind Greenway Greenhouse Cannabis Corporation