



## Modern Slavery Statement

This statement is made on behalf of Rubicon Organics Inc. (TSXV: ROMJ) (OTCQX: ROMJF) ("Rubicon Organics", "Rubicon", or the "Company") and its subsidiary Rubicon Holdings Corp. We are publishing this statement in accordance with *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)*. This statement summarizes the steps the Company has taken during 2025 to address the risks of forced labour and child labour used by the Company or in its supply chain.

### 1. Introduction

Rubicon Organics is a licensed producer focused on cultivating and selling organic certified and premium cannabis products. We are committed to a culture of honesty, integrity, and accountability, and we strive to operate in accordance with the highest ethical standards and all applicable laws and regulations.

### 2. Company Overview & Supply Chain Structure

#### **Structure**

Headquartered in Vancouver, British Columbia, Rubicon Organics Inc. exists under the laws of the Business Corporations Act (British Columbia) and its common shares are listed under the symbol "ROMJ" on the TSX Venture Exchange and under the symbol "ROMJF" on the OTCQX. Rubicon Organics has one wholly owned subsidiary, Rubicon Holdings Corp. ("RHC") which is incorporated in British Columbia, Canada.

Rubicon Organics, through RHC, is a licensed producer under the Cannabis Act focused on providing premium and organic certified cannabis for the recreational and medical-use markets in Canada. Rubicon Organics owns and operates two fully licensed facilities; a 125,000 square foot high-tech greenhouse located on a 20-acre property in Delta, British Columbia, as well as a 47,500 square foot indoor cultivation facility located in Hope, British Columbia.

#### **Customers**

The Company has direct supply agreements in place with the British Columbia Liquor Distribution Branch ("BCLDB"), the Alberta Gaming, Liquor and Cannabis Commission ("AGLC"), the Ontario Cannabis Stores ("OCS"), the Société Québécoise du cannabis ("SQDC"), Cannabis NB ("CNB"), the Yukon Liquor Corporation ("YLC") and sells directly to Manitoba Liquor & Lotteries ("MBLL"), the Northwest Territories Liquor, Cannabis Commission ("NTLCC"), the Newfoundland Liquor Corporation ("NLC"), Nova Scotia Liquor Corporation ("NSLC"), and the Prince Edward Island Cannabis Management Corporation ("PEICMC"). We have agreements with distributors in Saskatchewan who distribute the Company's products to certain provincial distributors and retailers. Additionally, we supply products to medical cannabis distributors in Canada and international markets.

Rubicon Organics is focused on achieving industry leading profitability through its premium cannabis flower, product innovation and brand portfolio management, including three flagship brands: its super-premium brand Simply Bare™ Organic, its premium brand 1964 Supply Co™, and its cannabis wellness brand Wildflower™ in addition to the Company's mainstream brand Homestead Cannabis Supply™.



## ***Our Employees***

Under our *Code of Business Conduct & Ethics* policy, employees of the Company must not only comply with applicable laws, rules and regulations but also must engage in and promote honest and ethical conduct and abide by the policies and procedures that govern the conduct of the business of the Company. The responsibilities of each employee include helping to create and maintain a culture of high ethical standards and commitment to compliance and maintaining a work environment that encourages employees to raise concerns with management and promptly addressing employee compliance concerns.

We are committed to maintaining a fair and ethical workplace for all our staff, free of bullying, harassment, discrimination and violence. Our *Bullying and Harassment Policy* provides that employees must:

- Not engage in the bullying and harassment of other workers;
- Report if bullying and harassment are observed or experienced;
- Apply and comply with the Company's policies and procedures on bullying and harassment.

All forms of forced labour and any form of human trafficking would not be tolerated by the Company. We ensure compliance with all applicable employment legislation relating to employee recruitment and terms and conditions, including obtaining right to work evidence and ensuring that no staff are paid less than the applicable national minimum wage.

Our workforce includes Temporary Foreign Workers ("TFWs") recruited under Canada's Temporary Foreign Worker Program (TFWP). The TFWP allows employers to recruit workers from outside Canada through the Canadian government as well as through external recruitment organizations where appropriate, to help address labour needs in Canada's agriculture sector.

## ***Our Contractors***

We use contract labour primarily to support farm labour needs during peak operational periods, including harvests. We work with reputable contractors and conduct due diligence with both prospective and current contractors to support compliance with our agreements and applicable requirements. This includes assessing whether contractors are in good standing with Workers' Compensation Boards in Canada.

## ***Supply Chain***

For the Company's inaugural Modern Slavery Statement, a detailed assessment of modern slavery risks within our supply chain was undertaken to identify areas with a higher potential exposure to forced labour or child labour. For suppliers assessed as higher risk, we performed additional analysis of procurement spend by vendor location, including a review of the geographic locations of their manufacturing and operational facilities. We also engaged with a select group of suppliers sourcing from higher-risk jurisdictions to assess their awareness of the Supply Chains Act and to understand the policies and controls they have implemented to address modern slavery risks.

In 2025, the Company reviewed this risk assessment and determined that there were no material changes to our vendor composition or overall risk profile. Looking ahead to 2026, the Company plans to undertake another comprehensive review of its vendor base to ensure the assessment remains current and to inform future risk management and mitigation activities.

### **3. Training and Policies in Relation to Forced Labour and Child Labour**

In 2025, we did not deliver dedicated training on forced labour and child labour. At the time of this report, the Company is working on a pilot targeted modern slavery awareness training program, intended to be



implemented in the latter half of 2026, prioritizing employees in procurement, supply chain, and human resources roles. We anticipate the development of training content that may cover recognition of forced labour and child labour indicators, the Company's reporting obligations under the Supply Chains Act, and available grievance channels. The Company plans to disclose progress and outcomes of this training in its next annual statement.

#### **4. Remediation**

The Company has not identified any confirmed instances of forced labour or child labour in its operations or supply chain during 2025. Accordingly, no remediation actions were required in the reporting period. In the event that forced labour or child labour were identified, the Company would assess the situation through its leadership team, take corrective action with the relevant supplier or contractor, and where appropriate, engage with affected workers to understand what remediation may be needed.

#### **5. Assessing Effectiveness**

The Company's ability to formally assess the effectiveness of its modern slavery measures is currently limited, reflecting the early stage of program implementation. For 2025, effectiveness was assessed through an annual review of the vendor base, which confirmed that no new higher-risk suppliers were introduced into the supply chain. As the program matures, the Company expects to enhance its assessment framework by developing more defined qualitative and quantitative performance indicators.

#### **6. Conclusion**

Rubicon Organics is dedicated to maintaining the highest standards of integrity and ethical conduct. Through proactive measures and ongoing collaboration with stakeholders, we are committed to preventing modern slavery and promoting human rights within our operations and supply chain.

(signed) "Margaret Brodie"

Margaret Brodie, CEO & Director

*I have the authority to bind Rubicon Organics Inc*

Date: May 13, 2026