

# 2023 MODERN SLAVERY REPORT

## INTRODUCTION

This modern slavery report (the “**Report**”) is produced by Organigram Holdings Inc. and its various subsidiaries, as described below, for the financial year ending September 30, 2023 (the “**Reporting Period**”) and sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Company.

This Report constitutes the first report prepared by the Company pursuant to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

## OVERVIEW OF ORGANIGRAM

### Entities Covered by this Report

In this report, the “**Company**”, “**Organigram**”, “we”, “us” and “our” refers to Organigram Holdings Inc. and its various subsidiaries. During the Reporting Period, the ultimate parent entity in the Organigram group of companies was Organigram Holdings Inc., a corporation incorporated under the *Canada Business Corporations Act* and listed on the Toronto Stock Exchange (TSX: OGI) and the NASDAQ Global Select Markets Exchange (NASDAQ: OGI).

During the Reporting Period, Organigram Holdings Inc. owned 100% of the shares in three licensed cannabis producers in Canada:

- Organigram Inc., incorporated under the *Business Corporations Act* (New Brunswick);
- The Edibles and Infusions Corporation, incorporated under the *Business Corporations Act* (Ontario); and
- Laurentian Organic Inc., incorporated under the *Canada Business Corporations Act*.

As of the last day of the Reporting Period, each of these subsidiaries were “entities” as defined in the Act. Immediately following the end of the Reporting Period on October 1, 2023, the three operating subsidiaries were amalgamated under the *Canada Business Corporations Act* to form a single entity as Organigram Inc.

This report is a joint report for Organigram Holdings Inc., Organigram Inc., The Edibles and Infusions Corporation, and Laurentian Organic Inc. as they existed during the Reporting Period. The information provided in this report generally applies to Organigram except where differences are noted.

## About Organigram and Our Activities

Headquartered in Toronto, Ontario, Organigram is a licensed cannabis producer that grows cannabis flower and manufactures cannabis-based products at three facilities across Canada. The Company's facility in Moncton, New Brunswick cultivates and produces indoor-grown cannabis flower, the facility in Lac-Supérieur, Quebec produces greenhouse-grown craft cannabis flower and hashish, and the facility in Winnipeg, Manitoba produces edible and extract cannabis products.

Organigram sells its products within Canada under several recognized brands including Edison, Shred and Monjour. Organigram also sells bulk cannabis flower internationally to legal medical cannabis markets including in Australia, Germany and Israel.

During the Reporting Period, the facility in Moncton, New Brunswick was operated by Organigram Inc., the facility in Lac-Superieur, Quebec was operated by Laurentian Organic Inc. and the facility in Winnipeg, Manitoba was operated by The Edibles and Infusions Corporation.

As of the end of the Reporting Period, the Organigram group of companies employed approximately 935 employees across its three facilities and corporate headquarters.

Further information about our business and activities can be found in our Annual Information Form dated December 15, 2023, which is available under the Company's issuer profile on the Canadian Securities Administrators' System for Electronic Document Analysis and Retrieval+ ("SEDAR+") at [www.sedarplus.com](http://www.sedarplus.com).

## Overview of our Supply Chain

The Company's supply chain consists of suppliers of product and non-product goods and services. Product goods we source include industrial equipment used in growing, drying, sorting and packaging cannabis and cannabis products. Non-product goods we source include raw cannabis and cannabinoids where required to meet our production needs, as well as goods used for packaging and shipping purposes such as plastic jars and pouches, rolling paper, filters, and cardboard packaging. Services sourced for our production process include laboratory testing and certification services for quality assurance purposes, licensed software for tracking and managing our cannabis inventory and production, quality auditing services, and transportation and logistics to transport our products to market. In total, we currently procure goods and services from approximately 110 suppliers.

Organigram seeks long-term relationships with major suppliers for the delivery of goods and services. Most of the goods and services that Organigram procures are sourced from suppliers with which we have existing contractual relationships.

Within our supply chain, we have built relationships with suppliers that serve the burgeoning legal cannabis industry in Canada and its unique needs. As a new industry in Canada producing a product that is illegal in many other parts of the world, many suppliers that provide goods and services specific to the cannabis are based nearby as well. Approximately 60% of suppliers we use in our manufacturing are based in North America.

We also have relationships with suppliers based in Europe that manufacture complex industrial equipment used in our facilities, and packaging traditionally used in the tobacco industry that is readily adaptable to the cannabis industry. Approximately 10% of the suppliers we use in our manufacturing are based in the European Union.

Where we are unable to source suitable goods domestically or from other G7 or European Union countries, some production inputs are sourced from suppliers that subcontract their production to businesses in regions that have been identified by The Global Slavery Index as being at a moderate or higher risk for forced labour and child labour, including China, India, Indonesia and Mexico.

## **OUR POLICIES AND DUE DILIGENCE PROCEDURES**

### **Our Code of Business Conduct and Ethics**

Our Code of Business Conduct and Ethics (the “**Code of Ethics**”) applies to Organigram’s directors, managers, officers, employees and consultants and provides guidelines for maintaining the integrity, reputation, honesty, objectivity and impartiality of the Company. The Code of Ethics covers a wide range of business practices and procedures, including setting out our expectations with respect to, among other things, compliance with laws, rules and regulations, illegal payments to government personnel, discrimination and harassment, health, safety and respect, and discrimination and harassment. A copy of our Code of Ethics can be found on our [website](#).

### **Our Whistleblower Policy**

Our Whistleblower Policy applies to Organigram’s directors, managers, officers, employees and consultants and provides a confidential method for any employee of Organigram to report a suspected violation of the Code of Ethics directly to the Chair of the Company’s Audit Committee (the “Chair”). The Whistleblower Policy sets out the procedure that the Chair shall follow in investigating reported violations, and protects employees who report a suspected violations from reprisals. A copy of our Whistleblower Policy can be found on our [website](#).

## Our Supplier Code of Conduct

Our Supplier Code of Conduct (the “**Supplier Code**”) applies to all supplier contracts that we enter into. The Supplier Code requires suppliers to represent and warrant their compliance with our policies and applicable legislation against bribery and corruption of political officials, insider trading, doing business with countries/regions under trade control sanctions, unauthorized use of intellectual property, and conflicts of interest. Recognizing the important role the Company plays in ensuring that our operations and products, and the supply chains that support these, operate to the highest ethical standards, in 2024, we updated the Supplier Code to prohibit the use of forced labour and child labour, as such terms are defined under the Act.

## Due Diligence

Organigram uses a risk-based approach to assess and manage its risk of forced labour and child labour in its supply chain. Our approach helps us prioritize our efforts and adjust our actions. Our methodology is to identify risks in our supply chain through a supplier and material survey conducted with a potential supplier prior to engaging in any purchasing. In assessing this survey, we consider country risk indicators, supplier’s category and type of products/ services offered by the supplier. Where appropriate, we may conduct additional diligence on a potential supplier to better understand potential risks or concerns. The decision to engage with a supplier, after conducting this due diligence is made by our senior leadership team on the advice of the applicable business groups and legal advice.

## ASSESSING AND MANAGING RISKS

As discussed above, Organigram engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced labour and child labour in our business and supply chains, we rely on the judgement and assessment of our supply chain and procurement professionals who search for, and evaluate, potential new suppliers with the support of the Company’s quality assurance, regulatory and legal departments as required.

To identify the business activities with the greatest exposure to these risks, we consider the following factors, among others:

- Reliance by supplier on a low skilled workforce,
- Dangerous or undesirable work involved in producing goods/services
- Long, complex or non-transparent supply chain
- Jurisdictional risks including poverty, conflict, and enforcement of international human rights standards

While we do not consider our activities and supply chains to carry a significant risk of forced labour or child labour given our workforce, policies and procedures, our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as product packaging and paper products used in our pre-rolled products,

as these goods are produced by suppliers in China, India or Indonesia. These suppliers are generally sub-contracted by suppliers based in Canada, the United States, or Europe that we deal directly with.

Where appropriate, Organigram seeks to source goods and services domestically within Canada in order to avoid the risks described above. As we continue to grow our business in Canada and internationally, Organigram intends to refine its approach to identifying and managing risks of forced labour and child labour in its supply chain.

## **REMEDATION MEASURES**

Our Supplier Code, our supplier due diligence process, and our framework for reporting ethical or legal violations, among other concerns, offer several avenues for our leadership to become aware of risks of forced labour and child labour in our supply chain. Based on our assessment of our activities and supply chain, as described above, in 2023, there were no measures taken to remediate any forced labour or child labour in our activities and supply chain, nor were any measures taken to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

## **ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

Organigram has in place a number of measures aimed at the prevention and reduction of the risk that forced labour or child labour is used in our business and supply chains, as further described above. While we have not yet taken any specific actions to assess the effectiveness of those actions, as our internal processes, systems and supply chains evolve, we will continue to take steps to monitor and assess the effectiveness of our actions in preventing and reducing risks of forced labour and child labour in supply chains.

## **TRAINING**

Organigram's employees receive regular tailored training on ethical topics and our policies, including our Ethical Code, Supplier Code and Whistleblower Policy. All new employees are assigned a mandatory onboarding training package on conduct and behaviour at Organigram. On an annual basis, all office employees are required to certify their abidance by these policies. Organigram's legal department has begun conducting presentations on the requirements of the Act to Company personnel and shall continue to do so in the future.

## **BOARD ATTESTATION**

This Report was approved pursuant to subparagraph 11(4)(b) of the Act by the Board of Directors of Organigram Holdings Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this 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 Organigram Holdings Inc. and Organigram Inc.

Per: (signed) "Beena Goldenberg"

Beena Goldenberg  
Chief Executive Officer, Organigram Holdings Inc.  
Director of Organigram Holdings Inc.

Date: May 21st, 2024