

# Sunrise Farms

## Fighting Against Forced Labour and Child Labour in Supply Chains



Last Updated: May 29, 2024

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This joint report has been prepared in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), for Sunrise Poultry Processors Ltd., Grand River Foods Ltd., High Noon Investment Corporation, and Carleton Hatcheries Ltd. (collectively, “Sunrise Farms”). This joint report is based on the Fiscal Year ended April 27, 2024.

### INTRODUCTION

Sunrise Farms services customers in the retail, food service and industrial sectors primarily in the poultry industry. As a leader in the industry, Sunrise Farms invests in the latest equipment and technologies at our facilities across Canada to ensure our customers receive the highest quality products.

Over our 40 plus years of history, we have laid deep roots in our communities. We stand firmly against the use of forced labour or child labour in our organization and in those of our suppliers and subcontractors. We aim to work with suppliers and partners that share similar values and goals as us in this respect. Sunrise Farms strives to continually improve its processes and record keeping to ensure adherence to laws, rules, regulations, and best practices.

### 1. STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN

#### Structure

Sunrise Farms is a privately owned group of companies that operates across Canada. Although the Sunrise Farms companies are related, they all operate as independent entities. Sunrise Farms is a national business with approximately 3500 employees across Canada.

#### Activities and Supply Chain

Operationally, we are involved in the hatchery business, primary processing, further processing, and distribution primarily of poultry products in addition to various other food products. We sell the food we manufacture through retail, food service and industrial supply chains. The majority of our supply chains are based in Canada, with some other North American sources. We have a small amount of sales to countries such as the Philippines, Angola, Gabon, Sierra Leone, Guinea, Haiti, Ghana, and Trinidad and Tobago. We have imported products from around North America, Australia, New Zealand, Spain, Italy, Brazil, Uruguay, and Honduras. We maintain a high degree of integrity in our business and relationships with suppliers and partners.

### 2. POLICIES AND DUE DILIGENCE PROCESSES

Sunrise Farms has implemented and holds its employees accountable to its Code of Conduct and Ethics (the “Code”). The Code has been designed and implemented to promote integrity, honesty and ethical conduct, as well as promote compliance with all applicable laws, rules, and regulations. Further, the Code is intended to deter unethical business practices, which include practices such as modern slavery. Further, the Code explicitly expects strict adherence to all human rights law and related workplace legislation from employees. Some of our suppliers have also implemented their own supply chain codes

of conduct, which include forced labour and child labour policies which we actively agree to and engage with.

Additionally, Sunrise Farms has implemented a Respectful Workplace Policy, reiterating the company's commitment to providing a healthy and safe working environment where all its employees are treated with dignity and respect. The Respectful Workplace Policy prohibits unprofessional behaviour, harassment, bullying, discrimination and workplace violence by any employees, contractors, suppliers, clients, or anyone who interacts with the company. The Respectful Workplace Policy also outlines a process for raising a concern, investigation, and resolution.

Further, all of our employees are paid through a centralized payroll system, which requires the input of an employee's valid Social Insurance Number and birth date. If any of the information inputted into the centralized payroll system leads to a determination that a hired employee is underage, then our Payroll department would alert the Human Resources department which would then escalate and resolve the matter expeditiously.

Currently, Sunrise Farms is in the process of implementing a comprehensive Whistleblower Service, which upon its completion, will provide our current employees an avenue to anonymously and confidentially report any suspected forced labour or child labour in our workforce. The Whistleblower Service outlines the company's commitment to observing the highest ethical standards. Sunrise Farms will ensure all employees, directors, and officers are made aware of the existence and availability of the Whistleblower Service, and trained on its purpose and use.

Sunrise Farms intends on developing its own Supplier Code of Conduct which it will require its suppliers to review and attest to. This Supplier Code of Conduct will include commitments and confirmations that no forced labour or child labour is used in the particular supplier's business and that the supplier is taking appropriate steps to prevent such type of labour being used in their business. Sunrise aims to work with partners who share the same vision and commitment to continuously improve, and to ensure the human rights of those individuals in our supply chains are protected.

### **3. FORCED LABOUR AND CHILD LABOUR RISKS**

Sunrise Farms recognizes that its business is large and there are areas in its supply chain that present a risk of forced labour or child labour being used. Areas of Sunrise Farms' supply chain that carry an inherent risk of forced labour or child labour include:

- (a) Manufacturing floor of primary processing and further processing;
- (b) Hatchery operations;
- (c) Distribution of product via internal channels and contracted companies; and
- (d) Food and food ingredient imports and exports.

Sunrise Farms intends on reviewing its supply chains in greater depth to identify any risks.

Some of the ways in which Sunrise Farms manages the above noted risks are as follows:

- (a) Applying and enforcing the Code;
- (b) Engaging with our employees, suppliers and other stakeholders to identify risks;
- (c) Periodically reviewing supplier compliance to relevant laws and regulations;
- (d) Selecting suppliers that uphold the highest levels of legal compliance and are leaders in their industry; and
- (e) Implementing a confidential and anonymous whistleblower service to report any human rights violations.

If Sunrise Farms identifies any suppliers that undergo compliance issues, including relating to child labour or forced labour, health and safety issues, or improper employment practices, the company may suspend

or terminate its relationships with such suppliers, or assist them in remediating their compliance as appropriate.

#### **4. REMEDIATION MEASURES**

To date there have been no reported or identified instances of child labour or forced labour in our supply chains. As a result, Sunrise Farms has not taken any measures to remediate any forced labour or child labour in its activities and supply chains.

#### **5. REMEDIATION OF LOSS OF INCOME**

To date, there have been no reported or identified instances of any loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

#### **6. TRAINING**

The Code is an important and mandatory training tool that Sunrise Farms uses when onboarding new employees. All levels of employees at Sunrise Farms are expected to review the Code and attest to their understanding and agreement to the same. Sunrise Farms plans on developing its own Supplier Code of Conduct which will require its suppliers to certify their compliance on an annual basis, and to report any non-compliance immediately.

#### **7. ASSESSING EFFECTIVENESS**

To date, the company does not have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

#### **ATTESTATION**

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.



David Shoore  
Chief Executive Officer  
May 29, 2024

I have the authority to bind Sunrise Poultry Processors Ltd., Grand River Foods Ltd., High Noon Investment Corporation and Carleton Hatcheries Ltd.