



Report

Fighting Against Forced Labour and Child Labour in Supply Chains Act
("Modern Slavery Act")

Fiscal Year 2023

Introduction

At Sure Good Foods Ltd. (“SGF”), we do not tolerate forced labour or child labour in our organization, or in those of our suppliers and customers. We have put the following measures in place to reflect these values and to comply with the laws and regulations for the jurisdictions in which we operate.

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a report for SGF and its subsidiaries which have an obligation to publish a report under the Act. This report refers to the 2023 fiscal year end.

Steps Taken to Prevent and Reduce Risks

In 2023, SGF has taken the following steps to prevent and reduce the risk that forced labour or child labour is used within our organization and within our supply chain.

- Annual review of our business practices with updates communicated to our team.
- Review of vendor applications which state their policies around prevention of forced labour and child labour.
- Ongoing training for team members.
- Following standard procedures to ensure we prevent forced labour and child labour by validating the age of employment eligibility, tracking labour hours, and ensuring respect in the workplace.

Structures, Activities and Supply Chains

Structure – SGF employs approximately 130 people, including those in sales, logistics, finance, and administration. Our operations are primarily in Canada, with our head office located in Mississauga, Ontario. We also have sales offices and representatives in Australia, Brazil, Mexico, Netherlands, Philippines, UAE, and USA.

Activities – SGF has been operating since 2000, trading food products across the globe. We purchase food products, primarily proteins from suppliers worldwide, and sell to customers in over 50 countries. Our main products include pork, poultry, beef, seafood, fruits, vegetables, and juice concentrates.

Supply Chain – Our supply chain includes purchasing products from various suppliers, mainly located in Canada, Australia, Brazil, USA, and Europe. We utilize third party transportation companies to ship our products to our customers located around the globe.

Policies and Processes

Business Conduct Policies – We require employees to follow best practices around business conduct, which is outline in our Employee Handbook, as well as follow all applicable laws and regulations. SGF will not tolerate any activities that violate the law or engage in unethical business practices, including those around forced labour or child labour. We require all suspected violations or concerns around this to be reported to Management, or to the Human Resource team.

Supplier Conduct Policies – Our process to set up new suppliers and customers includes a thorough screening. We also regularly review our suppliers and customers to ensure they continue to meet our requirements, including those of social compliance. We expect all businesses in our supply chain to follow the same standards as SGF.

Human Resource Policies – We assess candidates and employees to ensure SGF is a safe workplace for everyone. We have many human resource policies outlined in our Employee Handbook, as well as a Human Resource team and Joint Health and Safety Committee to support issues or concerns.

Risk Assessment and Management

SGF recognizes that parts of our supply chain have a risk of forced labour or child labour. We manage this risk by following the steps below.

- Enforcing our sales policies to ensure risks are assessed regarding our suppliers and customers
- Enforcing our human resource policies to ensure there is no forced labour or child labour within our organization
- Communicating with our suppliers and customers to identify risks or non-compliance
- Requiring potential concerns to be reported
- If non-compliance is reported, we will suspend our business with the supplier or customer and once the violation has been resolved, assess if or when to continue the relationship

Measures Taken

There have been no identified or reported instances of forced labour or child labour within our activities and supply chain.

There have been no identified or reported instances of 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 chain.

Trainings

To progress and enhance our training around forced labour and child labour, we are planning to add additional training for our employees, as well as incorporate an annual document for our suppliers and customers to sign.

Effectiveness Assessment

To assess the effectiveness that forced labour and child labour are not being used in our business and our supply chain, we follow the steps below.

- Reviewing our policies, as well as those of our suppliers and customers annually to ensure compliance
- Open line of communication to the Human Resource team to have employees report concerns or issues, internal or external
- Following reports provided by industry and insurance specialists that provide updates and news on our suppliers and customers
- Discussing with our network of suppliers and customers on matters related to social compliance to review best practices

Attestation

SGF remains committed to preventing forced labour and child labour from taking place in our business and in our supply chains. We will continue to review our policies, procedures, and practices.

In accordance with the requirement of the Act, I attest that I have reviewed the information contained in the report, and that it is true, accurate and complete.



Troy Warren
President
Sure Good Foods Ltd.

May 10, 2024

Date