

**Sunterra Quality Food Markets Inc.**

**2024 Report under the *Fighting Against  
Forced Labour and Child Labour in Supply  
Chains Act***

## Introduction

This report has been prepared by Sunterra Quality Food Markets Inc. (“**Sunterra**”) in response to the requirements under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for our financial year ending December 31, 2024 (the “**Reporting Period**”).

The Act requires Sunterra to report on our activities in relation to the production and sale of goods in Canada. Sunterra is not subject to reporting requirements under supply chain legislation in jurisdictions outside of Canada, and this report is therefore structured to meet the requirements of the Act.

Sunterra recognizes that the food retail industry plays an important role in preventing and assessing the risk of forced labour and child labour in Canada’s supply chain. We are seeking opportunities to continuously improve our due diligence, risk assessment, remediation and training processes.

Sunterra is committed to respecting, protecting and promoting the human rights of people impacted by our operations and supply chain.

## Organizational structure, activities and supply chain

### Structure

Sunterra is a privately owned food retail company. Sunterra has approximately 600 employees and our headquarters are located in Calgary, Alberta.

### Activities

Sunterra is devoted to nourishing customers with affordable, fresh, wholesome food. We provide quality meat, catering and a unique European-style grocery shopping experience through our retail operations, Sunterra Market. We have eight markets across Alberta, located in Calgary, Edmonton and Red Deer.

### Supply chain

Sunterra sources grocery items and food service ingredients from producers and suppliers, the majority of which are Canadian companies.

To support our markets across Alberta, our supply chain encompasses a diverse range of food suppliers, from fresh produce and packaged items, meats, cheese and dairy, each playing a critical role in sourcing fresh Canadian and local ingredients.

We engage approximately 450 local and Canadian suppliers of goods and services.

Sunterra directly imports cheeses and semolina flour from two suppliers in Italy. Sunterra also receives goods and services from six suppliers in the United States.

Local vendor profiles are provided on the Sunterra Market website, which can be accessed here: [www.sunterramarket.com/Vendors](http://www.sunterramarket.com/Vendors)

## **Steps to prevent and reduce the risks of forced labour and child labour**

In the Reporting Period, Sunterra did not take any specific steps to prevent and reduce the risks of forced and child labour. Within our operations, Sunterra takes steps to maintain compliance with all provincial, federal, and industry employment standards and laws applicable to our business.

## **Governance, policies and due diligence processes**

In the Reporting Period, Sunterra had not yet directly addressed the prevention and mitigation of forced labour and child labour in our operations and supply chains within our governance structure, policies, due diligence processes and risk management systems.

Sunterra has a Team Member Handbook that serves as a reference guide for all employees (“Team Members”) on our expectations, policies and procedures for professional, safe and ethical conduct, in compliance with laws, rules and regulations. Some of the policies embedded in the Handbook include Food Safety, Hygiene and Health, Anti-Discrimination and Violence in the Workplace.

Sunterra also has an Operations Health and Safety Statement that applies to all Team Members contractors, subcontractors, customers and suppliers, that outlines our commitment to creating and maintaining a healthy, safe work environment.

In the Reporting Period, Sunterra had not implemented risk assessment and due diligence processes to evaluate, prevent and mitigate human rights risks in our operations and with our suppliers.

## **Forced labour and child labour risk**

Sunterra considers our Canadian operations to be located in low-risk jurisdictions.

In the Reporting Period, we did not identify any risks of forced or child labour within our activities and direct suppliers; however, we have not started a formal risk assessment process.

## **Remediation measures and remediation of loss of income**

To date, Sunterra has not received any complaints relating to forced labour or child labour in our operations or supply chain, and as such has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

## **Employee training**

In the Reporting Period, Sunterra had not yet developed specific training materials or activities to increase awareness of and prevent forced labour and child labour in our operations or supply chains.

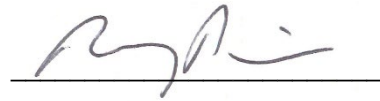
## **Assessing effectiveness**

In the Reporting Period, Sunterra had not yet developed an approach to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

## Approval and 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.

Dated in the Village of Acme, AB, this 28<sup>th</sup> day of May, 2025.

A handwritten signature in blue ink, appearing to read "Ray Price", is written above a horizontal line.

Ray Price, Director

I have the authority to bind Sunterra Quality Food Markets Inc.