



Report

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

Fiscal Year 2024

Introduction

At Sure Good Foods Ltd. (SGF), we have a zero-tolerance approach to forced labour and child labour, both within our organization and throughout our supply chain, including suppliers and customers. To reflect our values and ensure compliance with the applicable laws in the jurisdictions where we operate, we have implemented a number of policies and practices.

This report is prepared in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), which mandates that businesses disclose the steps taken during the fiscal year to prevent and reduce the risk of forced labour and child labour in their operations and supply chains. The information contained herein pertains to SGF and its subsidiaries subject to the reporting obligations under the Act, covering the fiscal year ending in 2024.

Steps Taken to Prevent and Reduce Risks

In 2024, SGF undertook several initiatives to minimize the risk of forced or child labour in our operations and supply chain. These actions included:

- Conducting an annual review of our business practices, with updates communicated company wide.
- Reviewing vendor applications to verify policies related to the prevention of forced and child labour.
- Providing ongoing training for employees on ethical labour standards.
- Adhering to standard operating procedures that include validating employee age, monitoring labour hours, and promoting workplace respect and compliance.

Structures, Activities and Supply Chains

Structure – SGF employs approximately 130 individuals across departments including sales, logistics, finance, and administration. Our headquarters is located in Mississauga, Ontario, and our operations are primarily based in Canada. We also maintain sales offices and representatives in Australia, Brazil, Mexico, the Netherlands, the Philippines, the UAE, and the USA.

Activities – Founded in 2000, SGF is a global trader of food products, with a focus on sourcing and distributing proteins and other food commodities. We purchase goods from a network of international suppliers and sell to customers in over 50 countries. Our key product categories include pork, poultry, beef, seafood, fruits, vegetables, and juice concentrates.

Supply Chain – Our supply chain involves procuring food products primarily from suppliers in Canada, Australia, Brazil, the United States, and Europe. We use third-party logistics providers to transport goods to our global customer base.

Policies and Processes

Business Conduct Policies – All SGF employees are expected to adhere to high standards of professional conduct as outlined in our Employee Handbook. This includes compliance with all relevant legal and ethical requirements. SGF explicitly prohibits any form of forced or child labour. Any concerns or suspected violations must be reported to management or the Human Resources team.

Supplier Conduct Policies – Our onboarding process for new suppliers and customers includes a rigorous screening to ensure compliance with our ethical and social standards. Regular reviews are conducted to confirm that all partners meet SGF’s expectations, particularly concerning labour practices.

Human Resource Policies – SGF evaluates prospective and current employees to maintain a safe and ethical workplace. Our Employee Handbook outlines various HR policies, supported by our Human Resources team and Joint Health and Safety Committee, to ensure workplace compliance and support.

Risk Assessment and Management

SGF acknowledges that certain segments of our global supply chain may present risks related to forced or child labour. To manage these risks, we have implemented the following controls:

- Enforcing sales and procurement policies that assess risk levels of suppliers and customers.
- Applying internal HR policies to prevent forced and child labour within SGF operations.
- Engaging in direct communication with suppliers and customers to identify and address potential compliance concerns.
- Encouraging the reporting of violations or issues.
- Suspending business relationships in the event of confirmed non-compliance, with reinstatement only after resolution and re-evaluation.

Measures Taken

There were no identified or reported instances of forced or child labour within SGF operations or its supply chain during the 2024 fiscal year.

Additionally, there were no reported cases where efforts to eliminate forced or child labour caused income loss for vulnerable families.

Trainings

To further enhance our compliance efforts, SGF plans to introduce additional training programs focused on the risks of forced and child labour. We also aim to implement an annual acknowledgment process requiring suppliers and customers to confirm their adherence to our labour standards.

Assessing Effectiveness

To evaluate the effectiveness of our efforts to prevent the use of forced and child labour, SGF undertakes the following:

- Annual review of internal policies and those of our suppliers and customers.
- Maintaining an open communication channel with Human Resources for employees to report concerns.
- Monitoring industry reports and insights provided by insurers and third-party specialists.
- Engaging with our global network of partners to discuss best practices in social compliance and ethical sourcing.

Attestation

SGF remains firmly committed to the eradication of forced and child labour from our operations and supply chains. We will continue to review and enhance our policies, procedures, and business practices to uphold this commitment.

In accordance with the requirements of the Act, I hereby attest that I have reviewed the contents of this report and confirm that the information provided is true, accurate, and complete.



Troy Warren
President
Sure Good Foods Ltd.

May 30, 2025

Date