

Sunrise Farms

Fighting Against Forced Labour and Child Labour in Supply Chains



Last Updated: June 12, 2026

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 Sunrise Chick Sales Ltd. (collectively, “Sunrise Farms”). This joint report is based on the Fiscal Year ended April 25, 2026.

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 the United States of 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.

Sunrise Farms has implemented a comprehensive Whistleblower Service, which allows our employees 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 has ensured 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 has developed its Supplier Code of Conduct which requires its suppliers to review and attest to. This Supplier Code of Conduct includes commitments and confirmations that no forced labour or child labour is used in the 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 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 continually reviewing its supply chains 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;
- (e) Canvassing its suppliers to ensure they are taking steps to reduce or eliminate the possibility of forced labour and child labour being present in their workforce; and
- (f) Implementing a confidential and anonymous whistleblower service to report any human rights violations.

If Sunrise Farms identifies any non-compliant suppliers, 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 forced labour in our supply chains. Additionally, no loss of income to vulnerable families has been reported or identified as a result of measures taken to prevent or eliminate the use of forced labour or child labour. Should any instance of child or forced labour be identified within our operations or supply chain, Sunrise Farms will take the following immediate and long-term actions:

Immediate:

- (a) If we identify child labour in our operations, the child will be immediately removed from the work environment.
- (b) Partner with reputable local child-welfare non-government organizations to identify, refer, and monitor the placement of affected children into appropriate education or vocational training programs, to ensure the child's best interests are considered by professionals.

Long-term Remediation:

- (a) Coordinate with local organizations and educational institutions to ensure that affected children receive appropriate education and training.
- (b) Coordinate with local non-governmental organizations, community organizations, and if applicable, government agencies to facilitate family access to social assistance programs and educational resources.

Preventative Measures:

- (a) Evaluate and identify the risk of forced labour and child labour within our supply chain.
- (b) Track the effectiveness of forced labour and child labour prevention and remediation efforts.
- (c) Ensure our business and business partners comply with all laws and regulations related to forced labour and child labour.

5. 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 has developed 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.

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
June 12, 2026

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