



2023 MODERN SLAVERY ACT REPORT

As of January 1, 2024, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) in Canada requires disclosure statements to be made in a report on certain company details and efforts made to ensure slavery and human trafficking are not taking place in our supply chain or business. This report is produced by SunOpta Inc. (“SunOpta”) and covers SunOpta’s fiscal 2023, a 12-month period ending on December 30, 2023. The following report serves as a statement complying with the Act.

ABOUT SUNOPTA

SunOpta is an innovative and sustainable manufacturer fueling the future of food. With roots tracing back over 50 years, SunOpta drives growth for today’s leading brands by serving as a trusted innovation partner and value-added manufacturer, crafting organic, plant-based beverages, fruit snacks, nutritional beverages, broths and tea products sold through retail, club, foodservice and e-commerce channels. Alongside the company’s commitment to top brands, retailers and coffee shops, SunOpta also proudly produces its own brands, including [SOWN](#)[®], [Dream](#)[®], and [West Life](#)[™].

We manufacture and sell the following:

- private label products to retail and foodservice customers;
- branded products under co-manufacturing agreements to other branded food companies for their distribution;
- branded products under our own proprietary brands to retail and foodservice customers; and
- bulk ingredients for use by foodservice customers and other food manufacturers.

Our employees and 7 manufacturing facilities are located in the U.S. and Canada. Our corporate headquarters is located in Eden Prairie, Minnesota, together with our innovation center and pilot plant.

We work with a diverse value chain of 170 suppliers in more than 28 countries. The principal raw materials we use are grains (oat, rice), fruits (apple, coconut), vegetables (soybean, hemp), nuts (almond), sugar, and meat (broth). We also use substantial quantities of carton board, corrugated, plastic, and aseptic packaging materials, operating supplies, and energy. Most of these inputs for our U.S. and Canadian operations are purchased from suppliers in the United States and Canada. If inputs are not locally available in adequate supply, they may be imported from other countries. We do not sell any SunOpta branded product in Canada.

STEPS TO PREVENT AND REDUCE FORCED OR CHILD LABOUR

As part of SunOpta’s supplier approval process, SunOpta asks new direct ingredient suppliers and food contact packaging suppliers to answer a self-assessment of their compliance with the Supplier Partner Code of Conduct (the “Supplier Code”). The self-assessment asks about the social policies adopted by the supplier and the working conditions provided for its employees. SunOpta reviews the answers on the self-assessment and decides whether that supplier is aligned with SunOpta’s standards before SunOpta does business with the supplier. Included in the Supplier Code is the expectation that suppliers share in our commitment to the rule of law and to compliance with applicable laws, including those related to slavery and human trafficking.

In 2022, SunOpta joined Sedex (a platform connecting suppliers to customers and creating transparency into the social practices of the suppliers) and we began training and implementation of our suppliers into the platform in 2023. In 2023, SunOpta also reviewed and updated the Supplier Code. In addition, we translated the Supplier Code into Spanish to ensure supplier comprehension. We also include a checklist and signature attestation for suppliers to confirm their compliance with the Supplier Code.

POLICIES AND PROCESSES

In 2023, SunOpta adopted a Human Rights Policy Statement aligning its commitment to the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights. SunOpta is committed to supporting and promoting human rights with regard to our employees, business partners, and suppliers. SunOpta's commitment to Human Rights is addressed in detail in SunOpta's [Code of Conduct](#) ("Employee Code") and its [Supplier Code](#).

We conduct in-person visits with selected suppliers as part of our process of ensuring they meet SunOpta expectations. Not only are we reviewing ingredient quality, we also are looking at plant and personnel hygiene practices, how our suppliers execute documented programs, and the broader economic and social environments in the areas from which we source our ingredients.

Every year is different in a growing region. We seek to understand what might be happening in a particular season, including environmental, social and political conditions. There are many factors that can impact a crop: weather, availability and cost of inputs, farming practices, labour availability, pest pressure, etc. Supplier visits allow us to better understand challenges the growers are facing and inform our expectations for crop performance.

We strive to get our feet inside the facilities regularly with our suppliers to confirm that practices in person are satisfactory and safe. We utilize third-party audits and certifications for some, but there is always something to learn and discover by physically walking through a facility and watching a supplier's programs and processes in action.

When we are visiting sourcing locations, we are mindful of the local culture and political environment. This is important to ensure we are sourcing ethically harvested products and also helps us to understand the dynamics of a region that can be factored into a risk assessment for proactive management.

The Audit and Corporate Governance committees of SunOpta's Board of Directors oversee reported violations of the Employee Code, including violations relating to matters of human rights. The Board of Directors, Senior Leadership Team, and Sustainability Steering Committee oversee SunOpta's overall approach to Environmental, Social and Governance (ESG) matters.

IDENTIFICATION OF SECTORS WITH INCREASED RISK

No sector or industry involving the production or importation of goods are assumed to be entirely free of forced labour and child labour risks. We have considered the ways in which our activities and supply chains could potentially cause, contribute to or be directly or indirectly linked to an actual or potential risk that forced labour or child labour is used in our supply chains. We understand the 2022 ILO report suggests that sectors where human trafficking and child labour are most prevalent include agriculture and manufacturing and we take this seriously.

MEASURES TAKEN TO REMEDIATE FORCED OR CHILD LABOUR AND ITS IMPACT ON THE MOST VULNERABLE

Measures taken to remediate forced labour or child labour in our activities and supply chains include adopting a Human Rights Policy Statement, engaging with Sedex to onboard our suppliers which will allow us to assess the risk of forced or child labour in our supply chain, visiting select suppliers prior to adding them to our supply chain, updating and translating our Supplier Code into Spanish, and optional training offered to select employees on our Supplier Code. We have judged that vulnerable families have not experienced loss of income as a result of steps SunOpta has taken to eliminate forced labour or child labour risks.

TRAINING

In 2023, we provided optional training of the Supplier Code to those employees that have the potential to interact with suppliers, including procurement, research & development, and quality. As part of the training, we emphasized the concern of human trafficking and child labour in industries within our supply chain; the red flags to be on the lookout for when talking with or visiting suppliers; and how to report a concern about a potential violation.

HOW WE ASSESS EFFECTIVENESS

We are taking steps to be able to assess our effectiveness by working with Sedex. There are capabilities within the Sedex platform to conduct risk assessments of our supply chain. Once we have onboarded the majority of our suppliers, we will assess the baseline social risk of our supplier base using the tools within Sedex and prioritize further action with those suppliers identified as high risk. We will set KPIs for improvements in areas such as supplier participation, transparency, and risk reduction based on our analysis of the risk assessment.

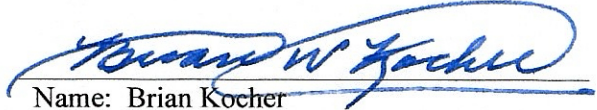
SunOpta distributes its Employee Code to all employees, officers, and directors of the Company. All managers are responsible for communicating to their teams about SunOpta's dedication to operating our business in accordance with the highest standards of ethical conduct and reinforcing this principle at every opportunity. Each department head or supervisor is responsible for monitoring compliance with the Employee Code by all employees within their department. Officers, directors, and senior leaders will reaffirm compliance with the Employee Code and all related policies on an annual basis. All employees are obligated to follow the Employee Code. Employees are also required to report any wrongdoing or violation of the Employee Code or related policies, violation of accounting or internal controls, or any incidents of fraud or alleged fraud in accordance with SunOpta's Ethics Reporting Policy. The Audit and Corporate Governance committees of SunOpta's Board of Directors oversee reported violations of the Employee Code.

APPROVAL AND ATTESTATION

This report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of SunOpta Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Per:


Name: Brian Kocher

Title: Director and Chief Executive Officer

Date: May 24, 2024

I have the authority to bind SunOpta Inc.