



## **Modern Slavery Act Report 2025**

This Modern Slavery Act Report (the “**Report**”) addresses the period from January 1, 2025 to December 31, 2025, and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”).

This 2025 Report is made on behalf of **Great Pacific Industries Inc. dba the Pattison Food Group, including its wholly-owned subsidiaries, Pattison Food Group Ltd., Everything Wine Inc., Pure Pharmacies General Partnership, Imperial Distributors Canada Inc., Sun Rich Foods Canada Inc. and Monte Cristo Bakery Ltd.** (collectively, “**PFG**”) and is a joint report.

## **I. INTRODUCTION**

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the Western Canadian grocery industry, PFG recognizes the important role it has in ensuring the supply chains that support its operations and products adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour. This Report sets out the steps we have taken during the 2025 fiscal year to prevent and reduce the risk of forced labour or child labour used at any step in the production of goods in Canada or elsewhere by PFG or of goods imported into Canada by PFG.

## **II. CORPORATE OVERVIEW AND SUPPLY CHAINS**

Established in 2021, PFG is a Jim Pattison business with roots back to a single store in New Westminster, BC, in 1915. This single store has since grown into an organization that includes some of the most well-known retail grocery stores throughout Western Canada, with locations serving communities of all sizes and corners of the provinces of BC, Alberta, Saskatchewan, Manitoba and the Yukon. Since the company was founded, the world has experienced incredible change and has become more interconnected than ever. Our first Overwaitea store had a mere fraction of the number and variety of products that can now be found in any typical grocery store, and this proliferation of products has yielded deeply complex and far-reaching supply chains.

PFG has always sourced local products first wherever possible, as part of its commitment to Canadians and Canadian producers. Our stores are proud to sell more than 2,500 local products made by over 2,000 local farmers and producers. However, there are many products that do not have their origins in Canada. As always, we expect that our suppliers and partners will act with integrity and comply with all local laws and international agreements at every step of the supply chain. The fact that issues such as forced labour and child labour exist and may be part of the production of goods that make their way to Canadians means that we, like every company in Canada, must move beyond these assumptions.

PFG encompasses many entities that supply food, pharmaceutical products, general merchandise, and consumer staples to millions of Canadians. These include the following:

- Pattison Food Group Ltd.;
- Everything Wine Inc.;
- Pure Pharmacies General Partnership;
- Imperial Distributors Canada Inc.;
- Sun Rich Foods Canada Inc.; and
- Monte Cristo Bakery Ltd.

PFG's office is located at 19855 92A Ave, Langley BC, V1M 3B6.

For the purposes of this Report, these entities are treated similarly as they often procure and sell the same categories and types of goods. For example, one of our produce wholesalers (VanWhole Produce), one of our fresh-cut produce companies (Sun Rich), and many of our retail stores may procure very similar or the same fruits and vegetables and have a similar or the same supply chain. Pharmaceutical products will also share many of the same brands, origins, and category offerings as one another, whether they are available at a distributor (Imperial Distributors Canada Inc.) or in our retail pharmacies (Save-On-Foods). Other services and resources are also shared among entities, including, but not limited to, administrative and personnel services.

The PFG entities listed above total approximately 30,000 employees, all of whom are in Canada. We have comprehensive recruitment oversight and employment practices that ensure our Canadian employees, working in all areas from retail locations to food manufacturers, are legally entitled to work in Canada and are of appropriate legal age for their role, working hours, and category of employment pursuant to applicable employment standards legislation. All required source deductions are collected and remitted to the CRA.

Our companies fall into the categories of retail grocery stores, food wholesalers, pharmacies and pharmaceutical distribution, and food manufacturers (Monte Cristo Bakery, Sun Rich Foods). The majority of PFG employees work in our retail stores or the operations to support them, with a relatively small number in the wholesalers, food manufacturers, and distributors.

While it is not feasible to exhaustively list all the products that PFG procures and sells, their origins, and the supply chains that accompany them, it is helpful to consider a typical grocery store and the assortment of products available there: everything from fresh produce to pies, frozen vegetables to paper towels, and tens of thousands of other products that vary from well-known international consumer brands to artisanal products from local businesses. PFG is the brand owner for several consumer brands that are sold in our stores and some of which are sold wholesale, including, but not limited to, Western Family, Only Goodness and Value Priced. There are also some private brands exclusive to specific retail banners, such as QF at Quality Foods and Earth's Choice at Choices, among others. PFG's private brand products are produced by various suppliers and are not directly manufactured by PFG.

### **III. POLICIES AND DUE DILIGENCE PROCESSES**

Like many food and consumer product companies, our supply chain is complex, with product origins varying by brand, supplier, and even seasonal factors. Staples such as coffee and oranges may come from different countries depending on sourcing conditions, making visibility essential to maintaining integrity and accountability.

Building on progress made in 2024, PFG has continued to advance its responsible supply chain strategy in 2025. All suppliers are required to formally commit to PFG's ESG Responsibility Standards

and Procedures. In parallel, PFG continues to collect both supplier policy information and product-specific data, with a focus on high-volume private brand products within its centralized procurement function.

As part of this process, PFG tracks product origin countries and requires suppliers to identify the most used ingredients in each product, including their countries of origin. Where applicable, seasonal or multi-origin sourcing is also captured to improve visibility into location-variable supply chains. This information supports the identification of potential risks related to forced labour and child labour at both the supplier and product level.

In addition, PFG incorporates Fair Trade-certified products within its private label portfolio as part of its responsible sourcing approach. These certifications support improved labour conditions and supply chain traceability, particularly in higher-risk sourcing regions. PFG continues to evaluate opportunities to expand Fair Trade sourcing across its private brand and unbranded products.

While challenges such as supply chain complexity and evolving supplier relationships remain, these efforts represent an important step toward strengthening transparency, enhancing due diligence, and supporting more informed procurement decisions across PFG's supply chain.

Within PFG the environmental, social, and governance (ESG) team collaborates with various business areas, including but not limited to private brands, merchandising, customs, and procurement, to identify and respond to forced labour and child labour risks. Ultimately, the executive is responsible for the senior-level oversight structures of identifying and responding to these risks, and for how PFG engages with external stakeholders.

#### **IV. RISK ASSESSMENT AND MANAGEMENT**

Though we sell a variety of consumer goods in our retail locations, our food business presents the highest risk of forced labour or child labour based on current understanding and industry practices. We recognize that food supply chains can include instances of forced labour or child labour, with certain regions carrying a higher likelihood of these risks.

We have continued to utilize our tools and systems to track and monitor supply chain risks in our products by analyzing the locations where they are produced and the origin of the ingredients used. Additionally, we have continued to collect information on our suppliers' policies, including, but not limited to, whether they have a supply chain policy that includes prohibiting child labour and forced labour, and how this policy is enforced across all their suppliers and vendors. In 2025 PFG collected and mapped risk on 115 suppliers and hundreds of products, and we are continuing to collect data, monitor risks, and adjust our supply chain where necessary.

The agricultural sector has been cited as having the highest prevalence of child labour, with commodities such as coffee, fish, cane sugar, tomatoes/tomato products, and cocoa being of

particular concern for Canadian imports<sup>1</sup> (World Vision, p. 5). As of 2019, the top five origin countries for 'risky' imports to Canada were Mexico, Brazil, China, Colombia, and Vietnam (World Vision, p. 6), with specific commodities associated with each of these regions. Much of this risk exists at the commodity production level, making visibility and traceability critical to addressing potential labour concerns in our supply chains.

## **V. MODERN SLAVERY REMEDIATION MEASURES**

PFG has a formalized process in place to delist the products of suppliers who violate our ESG Terms & Conditions. Historically, in the rare instances PFG has been notified of suspected forced labour or child labour in our supply chain, PFG immediately removes the affected products from sale and delists the supplier. PFG did not experience any of these instances in 2025.

## **VI. LOSS OF INCOME – REMEDIATION MEASURES**

We are continuing to develop formalized processes and policies to address forced and child labour within our supply chains and the products we procure. While we have implemented systems to improve supply chain tracking and visibility, we do not have comprehensive data on the full extent of these risks or metrics to assess the effectiveness of our efforts.

As a result, we have not established specific measures to remediate potential income loss for vulnerable families impacted by our efforts to eliminate forced or child labour from our supply chains.

## **VII. TRAINING**

In 2025, PFG completed the implementation of a training program on forced labour and child labour risks in supply chains. The program outlines PFG's policies, due diligence expectations, and broader human rights considerations, enabling more informed supplier engagement. The training also focuses on human rights topics more generally, laws and international conventions on labour, and potential situations where human rights may be impacted.

In addition, PFG began expanding the program to include selected procurement team members in the risk assessment process, supporting greater cross-functional involvement and organizational depth in identifying and evaluating supply chain risks.

The training is mandatory for our Pattison Food Group Ltd. centralized procurement and supplier relationship management team members and available on demand to all employees through the learning management system.

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<sup>1</sup> World Vision Canada. (2023). Child labour & risky goods report. <https://www.worldvision.ca/WorldVisionCanada/media/NCFS/Reports/WVC-FY23-Q1-Child-Labour-Risky-Goods-Report-2023.pdf>

## **VIII. ASSESSING EFFECTIVENESS**

Given the complexity of global food supply chains, where products and ingredients may change ownership multiple times before reaching our stores, comprehensive traceability solutions and standards are critical for ensuring responsible sourcing.

In 2025, PFG continued integrating standardized evaluation systems and processes to improve supply chain transparency. Our information gathering and risk assessment program enhances visibility into the origins of finished products and the top ingredients used in each product, including instances of multi-source or seasonal sourcing. This approach supports the identification of potential risks, informs where mitigation may be required, and enables more informed procurement decisions.

As we are still in the early stages of supply chain mapping and risk assessment through these practices, we do not yet have metrics of effectiveness. Recognizing that industry collaboration is essential to progress, PFG continues to engage in industry initiatives, work with associations, and leverage emerging best practices to strengthen traceability and support continuous improvement in our approach to ethical sourcing.

**IX. APPROVAL AND ATTESTATION**

This Report was approved pursuant to section 11(4) of the Act and has been submitted to Public Safety Canada. This Report is also available on our company website at [www.pattisonfoodgroup.com](http://www.pattisonfoodgroup.com).

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of President of PFG, attest that I have reviewed the information contained in this Report for PFG. 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 within this Report.

I have the authority to bind PFG.


Printed Name: Jamie Nelson

Title: President

Company: Pattison Food Group

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

  
May 8 / 2026