

ALBERTA SECURITIES COMMISSION

CEASE TRADE ORDER

Citation: 2020 ABASC 158

Date: 20201009

Sunshine Oilsands Ltd.

Background

1. Sunshine Oilsands Ltd. (the **Issuer**) head office is in Alberta.
2. The Issuer is a reporting issuer in Alberta and Ontario.
3. Financial statements filed under National Instrument 51-102 *Continuous Disclosure Obligations* (**NI 51-102**) must be prepared in accordance with National Instrument 52-107 *Acceptable Accounting Principles and Auditing Standards* (**NI 52-107**).
4. Under paragraphs 3.3(a) and (b), subparagraphs 3.3(a)(i), (iii) and (iv) and section 3.4 of NI 52-107, financial statements, other than acquisition statements, that are required by securities legislation to be audited must be audited in accordance with Canadian GAAS and be accompanied by an auditor's report that:
 - (a) Expresses an unmodified opinion,
 - (b) Is in the form specified by Canadian GAAS for an audit of financial statements prepared in accordance with a fair presentation framework,
 - (c) Refers to IFRS as the applicable fair presentation framework if the financial statements are prepared in accordance with Canadian GAAP applicable to publicly accountable enterprises,
 - (d) Is accompanied by the predecessor auditor's reports on the comparative periods where the issuer has changed its auditor and one or more of the comparative periods presented in the financial statements were audited by a predecessor auditor, and
 - (e) Is prepared and signed by a person or company that is authorized to sign an auditor's report under the laws of a jurisdiction of Canada or a foreign jurisdiction, and that meets the professional standards of that jurisdiction.
5. Section 4.1 of NI 51-102 sets out the requirements for the filing of comparative annual financial statements.
6. The Issuer filed its comparative annual financial statements for the year ended December 31, 2019 and 2018 (**2019 AFS**) on SEDAR on March 30, 2020.

7. The Issuer's 2019 AFS was not prepared in accordance with the requirements of Alberta securities laws outlined in paragraph 4 above.

Decision

8. Under section 33.1 of the Act, it is ordered that trading or purchasing cease in respect of each security of the Issuer until this order has been revoked or varied.
9. Despite this order a beneficial securityholder of the Issuer who is not, and was not at the date of this order, an insider or control person of the Issuer, may sell securities of the Issuer acquired before the date of this order if both of the following apply:
 - (a) the sale is made through a "foreign organized regulated market", as defined in section 1.1 of the Universal Market Integrity Rules of the Investment Industry Regulatory Organization of Canada; and
 - (b) the sale is made through an investment dealer registered in a jurisdiction of Canada in accordance with applicable securities legislation.

9 October 2020

"original signed by" _____

David Linder
Executive Director