



ANNUAL REPORT

PURPOSE

This joint annual report for the 2024 fiscal year has been created by 1769906 Ontario Limited on behalf of 632162 Ontario Limited (“**Wyndham Gardens Hotel**”) and Carmelo Niagara Company Ltd. (“**Carmelo Niagara**”) for the sole purpose of meeting their obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”).

OUR COMMITMENT

Wyndham Gardens Hotel and Carmelo Niagara are committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that they import into Canada.

CATEGORIZATION, SECTOR, AND INDUSTRY

Our Operations

Wyndham Gardens Hotel and Carmelo Niagara are both wholly owned subsidiaries of 1769906 Ontario Limited. Wyndham Gardens Hotel is a hotel located in Niagara Falls, Ontario. It operates in the accommodation and food service industry, and it engages in producing and selling goods within Canada.

Carmelo Niagara is a management company that owns and operates the Wyndham Fallsview Hotel, multiple food & beverage outlets, and it is engaged in renting real property in Niagara Falls.

Wyndham Gardens Hotel and Carmelo Niagara are also members of the Fallsview Group and are informed by its various policies and codes of conduct. Established over 35 years ago, the Fallsview Group is one of the leaders in hospitality and tourism in the Niagara area.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Supply Chain

The primary area of operations for both Wyndham Gardens Hotel and Carmelo Niagara is hospitality. Both entities primarily source their hospitality products from suppliers in the United States. These products include, but are not limited to, linen, terry cloth, shampoo, conditioner,



and various paper products.

Steps Taken by Carmelo Niagara and Wyndham Gardens Hotel in Fiscal Year 2024

To prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada, Wyndham Gardens Hotel and Carmelo Niagara maintained related policies and due diligence processes that were in force throughout the 2024 fiscal financial reporting year. These policies and processes helped to mitigate the risk of forced labour or child labour within its own internal organization and in its supply chain.

POLICIES AND DUE DILIGENCE PROCESSES

Wyndham Gardens Hotel and Carmelo Niagara Policies and Processes

Both Wyndham Gardens Hotel and Carmelo Niagara maintained several policies and processes which affirm their commitment to abiding by applicable forced labour and child labour laws, including:

- a) The Fallsview Group's Employee Handbook, which mandates that all employees must abide by all forms of applicable laws, rules, regulations and all requirements of applicable regulatory, self-regulatory and administrative bodies.
- b) The Fallsview Group's New Hire Form, which requires the date of birth of all prospective candidates. This reduces the risk of child labour within both the Wyndham Gardens Hotel and Carmelo Niagara, and by extension, the broader Fallsview Group.

FORCED LABOUR AND CHILD LABOUR RISKS

Both Wyndham Gardens Hotel and Carmelo Niagara have not started the process of identifying risks in their activities and supply chains. However, the current policies and procedures in place – including the Employee Handbook and New Hire Form – help to ensure compliance with applicable legislation and mitigate the risk of child labour and forced labour being present the organization's business activities. Both Wyndham Gardens Hotel and Carmelo Niagara are aware that there may be higher risks of child labour and forced labour associated with certain regions, goods, and industries.

REMEDIATION MEASURES

Both Wyndham Gardens Hotel and Carmelo Niagara have not identified any forced labour or child labour in their activities or supply chains. As such, they have not undertaken any remediation measures.

REMEDIATION OF LOSS OF INCOME

Both the Wyndham Gardens Hotel and Carmelo Niagara have not identified any loss of income to



vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, they have not undertaken any remediation measures for loss of income.

TRAINING PROVIDED TO EMPLOYEES

In fiscal 2024, Wyndham Gardens Hotel and Carmelo Niagara did not provide training to its employees specific to forced labour or child labour. Moving forward, they will be assessing what related training may be appropriate.

ASSESSING EFFECTIVENESS

Wyndham Gardens Hotel and Carmelo Niagara currently do not have specific policies and procedures in place to assesses its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, as outlined above, the policies and procedures that are currently in place do reduce the risk that child labour and/or forced labour is present in their activities and supply chain.

APPROVAL AND 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 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

IN WITNESS WHEREOF the authorized signing officer(s) of 1769906 Ontario Limited, 632162 Ontario Limited, and Carmelo Niagara Company Ltd. have executed this report as of the effective date of the signatures set out below.

SIGNED

Date

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) **1769906 Ontario Limited**
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) **Per:** _____
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) **Name:** Carmelo Menechella
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) **Title:** President
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I have authority to bind 1769906 Ontario Limited



SIGNED

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632162 Ontario Limited

Per: _____

Date

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Name: Carmelo Menechella

Title: President

I have authority to bind 632162 Ontario Limited

SIGNED

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Carmelo Niagara Company LTD.

Per: _____

Date

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Name: Carmelo Menechella

Title: President

I have authority to bind Carmelo Niagara Company LTD.