

May 31, 2024



2024 REPORT ON BILL S-211, AN ACT TO ENACT THE FIGHTING
AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY
CHAINS ACT AND TO AMEND THE CUSTOMS TARIFF



MILOS GROUP

2024 FINANCIAL REPORTING YEAR

1-INTRODUCTION

This Report is published pursuant to the Canadian “Fighting Against Forced Labour and Child Labour in Supply Chains Act” and sets out the steps that 3903427 Canada Inc. (“Milos Group”) has taken to fight forced and child labour in our business and supply chains. The Report refers to the 2024 fiscal year end and covers activities from April 1, 2023 to March 31st 2024.

A deep commitment to legal compliance and ethical business practices is firmly embedded in Milos’ history and company culture. We recognize our responsibility to respect and protect the human rights of all people who are part of or interact with our business. We are committed to acting ethically and with integrity and transparency as we continuously strive to put systems and processes in place to safeguard against any form of forced or child labour in our supply chain.

We expect our business partners and suppliers and their contractors to uphold these same principles within their operations.

2. STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

Structure

Founded in 1979 in Montreal, Quebec and still owned and operated today by Costas Spiliadis and his family. The Head office is located at 5357 Park Avenue, Montreal, Quebec, H2V 4G9. Milos is a corporation organized under the laws of Canada. Milos is incorporated under the Canada Business Corporation Act registered under the name of 3903427 Canada Inc ,Corporation number 1590940-6 and Business Number 884412511RC0003. The corporation was created on April 1, 2024 following an amalgamation of two Milos Companies.

Activities

Milos is a restaurant group operating nine restaurants around the globe. Milos raison d’etre is to educate people around the world about Greek food and culture. We presently employ 750 people and with our three new locations scheduled to open within the next 12 months we will be at 1,000 employees worldwide.

In many ways, the story of Milos goes back millennia. The Milos experience is about far more than an exquisite meal. It encompasses the time-honored virtue of hospitality or, to put it in Greek, philoxenia. This love for strangers—which is what the word actually means—was, and continues to be, part of a Greek’s moral code. When Milos first opened its doors, it was to welcome guests to an experience that embraced dining as an act of sharing.

Our philosophy is simple. We believe that certain values are timeless and remain undiluted from generation to generation. And even when people are often drawn towards the spectacular, an internal compass leads them back to the basics. This process of enriching life through simplification is more often encountered in places where people live closer to nature, whether that’s a mountain range or an archipelago. In those terms, to say that Greece is geographically blessed is, probably, an understatement. Yet it’s this daily interconnection with nature that makes us very appreciative of its offerings—and even more assiduous in the way we use them.

Preparing a freshly-caught sea bream or a just-harvested oyster is being in touch with nature in its purest form. Yet this great privilege comes with a condition. And that’s no other than to use ingredients that will help bring out

even more of that freshness. As we brush a hand across a bush of Greek thyme or scoop up a handful of sea salt, we find the connection to nature to be just as electrifying. And at Milos, this is precisely the feeling that we try to bring to the table every day.

Hospitality, this sacred art of making a stranger feel like home, starts with a sumptuous meal. But it certainly doesn't stop there. With xenodocheio Milos, the very first luxurious gastronomy 5-star hotel in the heart of Athens, we combine unassuming elegance and discreet yet fastidious service with the gastronomic experience you've come to expect from Milos. Featuring individually styled rooms and suites with marble bathrooms, exquisite linen and terraces that encourage sun worship, it is a discerning traveler's sanctum, meant to cater to mind, body, and soul. For guests who'd rather savor Greek cuisine afloat, we offer Milos at Sea: our 113-foot yacht can accommodate up to 10 guests in 4 cabins, while her spacious dining area is the ideal spot to enjoy the very best Greek cuisine Milos is famous for. And between relaxation and nourishment, one can swim in secluded coves, explore remote beaches and indulge in a bit (or a lot) of island nightlife. Closer to home, for an impromptu get-together, we suggest a visit to Milos Wine Bar. Located at 20 Hudson Yards, it features 100 expert-selected Greek wines which highlight not only the geographical features of each region but also its history and cultural treasures. It's a deep immersion into the unexplored world of Greek wines.

Supply chains overview and parts that carry a risk of forced labour or child labour

Milos takes pride in the brand name and controls all procurement through the head office from specified suppliers. Milos globally sources products for its restaurants and ensures they only deal with reputable suppliers to maintain their quality and reputation as leaders in the industry.

The majority of the products sourced come from the US, Portugal and Greece and are supplied by companies that Milos has been working with for years and has developed a strong relationship with. The majority of our purchases, fish and protein, are sold to us in their raw form and the employees of our suppliers tend to be very experienced and possess a very high skill set.

As a result, such countries have a low inherent risk of child labour and forced labour.

Nonetheless, we acknowledge that the supply chain of our suppliers may extend into regions potentially facing greater risk of forced labour and child labour. In these cases, we send a delegate to check out the professionalism of the organization prior to any commitment to business, including looking at the well being of the employees, including safety and the presence of child labour.

3. COMPANY POLICIES AND PROCESSES IN RELATION TO FORCED AND CHILD LABOUR.

All our suppliers have been working with us for many years and all have an excellent reputation within their respective industries. We discuss the concerns with our suppliers in the US, Europe and Canada and we will continue making Human Rights assessments part of our annual supplier reviews.

In addition, Milos Holdings relies on the efforts of all its locations and local management to ensure they properly manage and monitor procedures with respect to human rights and those of its suppliers.

Suppliers have been informed to monitor the compliance of their operations to ensure child labour and forced labour laws are followed within all areas of their organizations. Suppliers are also responsible for ensuring us that any of their suppliers or third-party contractors are also held to the same standards concerning Human Rights in the workforce.

As such, several of our larger suppliers in Canada and the US are actively working on procedures and policies regarding child labour and forced labour codes of conduct. We have advised suppliers that if these laws are ever broken we have the right to nullify and contracts or agreements.

Human Capital (Our Employees)

Milos has always been and will continue to be a fair and equitable employer that puts the well-being of its employees ahead of anything. Within all our locations we have created a safe and inclusive environment for all our colleagues and workers. We manage the risk of child labour and forced within our own operations by means of the following practices:

- Governance
 - We ensure proper background checks are conducted on all our employees prior to offering them any position in the organization.
 - We do not hire people under the age of 18 for any type of position, Admin, front of the house or the Kitchen.
 - Members of the executive team visit the teams at each location with unannounced visits to ensure the standards are adhered to.
 - HR department is aware of the need to ensure no child labour laws have been broken and it is part of the hiring process and onboarding procedures.

- Tracking and monitoring
 - We have started communicating and monitoring the composition of employees on our monthly calls with local management to ensure they are in line with our policies and are constantly aware of the importance in elimination any involuntary labour from our business if any arises.

- We have informed local management at all our locations to review not only potential hires in all departments and apply our Child labour procedures but to also continually monitor the composition of their current staff.

4. REMEDIATION

Throughout our various interactions, we have never encountered issues suggesting the existence of child or forced labour. As a result, there have been no occurrences requiring taking any measures to remediate any forced labour or child labour. As such, we have not taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in supply chain related activities.

5. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

During the reporting period, we did not provide formal employee training with regards to forced labour and child labour issues. We recognize that potential risk of forced labour and child labour resides may reside in our supply chain and we are committed to ensuring that we engage with supplier that have high ethical standards and that do not engage in such practices. As a result, we will provide such training to employees on this key topic in the near future. More specifically, our training will cover items such as:

- We are revamping our onboarding and training manuals to include a detailed explanation of our position on Human Rights.
- All our staff is aware that involuntary (Child and Forced) labour will not be tolerated by Milos. If and when an individual becomes aware of any Human Rights issues they must communicate them directly to Head Office in Montreal.
- Employees dealing directly with our suppliers must make sure they communicate to them what is expected from them under this policy of zero tolerance with respect to involuntary labour practices.
- The scope of this training will be to focus on our policies and hiring practices to address the issue as well as do our part to identify and eradicate child labour and forced labour in the workplace.

6. EFFECTIVENESS ASSESSMENTS TO ENSURE FORCED AND CHILD LABOUR ARE NOT BEING USED IN OUR OPERATIONS AND SUPPLY CHAIN.

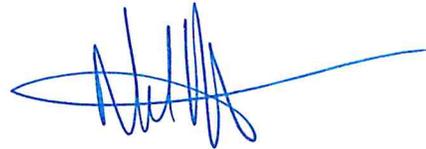
Due to insufficient and/or our lack of formal practices and timeliness, we acknowledge that we have not been fully effective during the reference period in ensuring that forced labour and child labour are not being used in our supply chains as per the S-211 guidelines. We are however committed to formalize our practices and will implement initiatives in the near future.

Our goal as an organization is to reduce and prevent the risk of Forced Labour and Child Labour within our own locations and the supply chain as a whole. We are going to continually monitor and assess the effectiveness of our procedures to ensure we are improving our and our suppliers Human Rights programs.

7. 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.

Name **NICK ATHANASOPOULOS**
Title **CFO**
I have the authority to bind 3903427 Canada Inc..



MAY 31st 2024