

729171 Alberta Inc.

**Fighting Against Forced Labour and Child Labour in
Supply Chains Act**

Year Ended February 29, 2024

Introduction

This report is made on behalf of 729171 Alberta Inc. (“Company”) and describes the actions taken by the Company during the financial year ending February 29, 2024, to assess, prevent, and reduce the risk that forced labour or child labour is used at any step in its operations and supply chains pursuant to the requirements of section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”). This Report constitutes the first report prepared by the Company under the Act. While the Company itself does not carry out any activities that would characterize it as an Entity under the Act, certain of its subsidiaries do and in that respect the Company is considered an Entity. No one subsidiary of the Company meets two of the three thresholds’ tests of assets, revenue or employees, however on a consolidated group basis certain thresholds are met and accordingly the Company is filing this report.

Steps taken to prevent and reduce the risk of forced labour and child labour

The Company has not taken any action to reduce the risks of forced labour and child labour in its activities and supply chains.

Structure, Activities, and Supply Chains

The Company is a holding corporation based in Mississauga, Ontario, with subsidiary entities based in Ontario, Nova Scotia, and Quebec. One subsidiary of the Company (Northampton Group Inc.) is involved in ventures relating to real estate and hotels. These ventures have been considered in this report although none of them are in the primary business of producing, selling or distributing goods. All hotels are operated by Canadian management. Any purchase and sale of goods would be incidental to hotel operations which are primarily supply use of hotel rooms.

The primary subsidiary entities that are involved in the sale of goods are hotels located in Ontario and Montreal. These corporations are wholly owned, or majority owned by the Company and operate franchised and independent hotels. None of these corporations in themselves meet two of the threshold tests. Collectively they contribute to the Company meeting the threshold tests for Revenues and Assets.

As an operator of hotels, our supply chain is primarily based on the purchase of goods and services from other third-party suppliers. The majority of these purchases are from local suppliers who in turn may be sourcing goods and services indirectly from third party suppliers. There is no one significant supplier and the dollar quantum is not significant for any one supplier. These goods and services include food, office supplies, cleaning supplies, linens, and other normal procurement in operating a hotel.

Policies and Due Diligence Processes in relation to Forced Labour and/or Child Labour

The Company acknowledges the paramount importance of safeguarding human rights and is dedicated to upholding the rights of all individuals. It wholeheartedly supports Canada's international commitment to combat forced labor and child labor, striving to eliminate modern slavery.

In pursuit of these objectives, the hotel's subsidiaries under its operational jurisdiction, such as those within the hospitality sector, have implemented comprehensive workplace policies. These policies cover employee standards of behavior, health and safety regulations, prevention of workplace harassment, and procedures for termination of employment.

Presently, both the hotel and its affiliated hospitality subsidiaries are conducting a thorough examination of third-party suppliers, to establish procurement protocols, particularly in cases where procurement is significant. Furthermore, there is an ongoing assessment of existing policies and procedures to ensure compliance with relevant legislation.

Risks of Forced Labour and/or Child Labour being Used and Steps Addressing Risk

The Company has not conducted an independent risk assessment regarding forced labor or child labor within its supply chain. Given that a significant portion of the hotel's supply chain aligns with that of its franchisors, including IHG, Marriott, Wyndham Hotels & Resorts, and Choice Hotels, it relies on the franchisor's assessment of this risk.

Regarding any non-franchised hotels, the Company is currently evaluating methods to assess and address compliance with relevant legislation.

Measures Taken to Remediate any Forced Labour or Child Labour

The Company has not identified any instances of forced labour or child labour in its supply chain, and so no remediation measures have been taken.

Measures Taken to Remediate Loss of Income to Vulnerable Families

The Company has not identified any instances of loss of income as a result of our efforts to reduce the risk of forced labour or child labour, and so there has not been a basis to take such remedial steps.

Training Provided to Employees on Forced Labour and/or Child Labour

The Company's subsidiaries regularly conduct training sessions focusing on workplace safety and human rights for their employees. In addition, the hotel management is considering incorporating modules into these training sessions that specifically address the assessment of risks in the supply chain related to human rights issues such as forced labor and child labor.

Assessing Effectiveness of Remediation Measures

The Company has not taken any action to assess its effectiveness in addressing the risks of forced labour and child labour in its activities and supply chains.

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 or entities 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.

Full name: Narendra Patel

Title: VP Finance

Date: May 29, 2024

Signature: 

I have the authority to bind 729171 Alberta Inc.