

# Statement on Fighting Against Forced Labour and Child Labour

This statement is made on behalf of the leadership of Cactus Restaurants Ltd ("Cactus") with regards to the Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Modern Slavery)*. This statement covers Cactus' reporting following the 2023 financial year period ( January 2023 to January 2024) and articulates the Group's policies and practices around recognising and preventing Modern Slavery in the global supply chain.

## **About Cactus**

Cactus Restaurants Ltd. is a private Canadian incorporated business and is the owner and operator of the CACTUS CLUB CAFE and KING TAPS restaurant brands. Cactus employs more than 6,500 business partners across Canada and operates 35 restaurants. Cactus operates with a centralized supply chain that extends to international suppliers of goods including agricultural and manufactured products and equipment, and other related goods and services.

## **Our policies and values**

Cactus recognises its responsibility to assess actual and potential human rights impacts across its operations and supply chain and is committed to working with a supply chain free from forced labour and child labour. Cactus seeks to work with value-aligned partners and suppliers and expects suppliers working on its behalf to reflect Cactus' commitment to acting ethically and with integrity in all business relationships. Cactus expects suppliers to implement and enforce systems and controls to ensure Modern Slavery is not taking place anywhere in their supply chains. The Group has commenced the process of integrating this Business Code of Ethics standard of business conduct into its contracts for all new and existing suppliers in its supply chain.

Cactus' business practices include the following core values which we also require from our suppliers:

- Employment is freely chosen
- Freedom of Association is respected
- Working Conditions are safe and hygienic
- Child labour is not used
- Working hours are not excessive
- No discrimination is permitted
- No harsh or inhumane treatment is permitted

## **Due Diligence, risk assessment and training**

In 2023, Cactus carried out supplier reviews as part of its supply chain risk management assessment to help identify various risk areas including material social and environmental issues relevant to our operations. The materiality assessment included the topic of human

rights. Following the results of the assessment, Cactus' supply chain managers reviewed and discussed areas requiring more robust confirmation of practices and ongoing engagement.

Cactus intends to undertake further risk assessments in 2024 in respect of its supply chain and we will continue to include more extensive contractual requirements of vendors to ensure equal or better diligence with respect to Modern Slavery.

Cactus is also committed to reviewing and updating its employees' training needs on an ongoing basis in these areas.

### **Assessment of effectiveness in preventing Modern Slavery**

Cactus will continue to keep under review new risks as they emerge and carefully monitor both existing and new suppliers and business activities with a robust verification program in place to confirm our suppliers' compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This is achieved through robust contract terms and expectations, regular supplier visits, communications and reviews. We believe in continuous improvement in the prevention of Modern Slavery and we will continue to review our ethical trading programme annually to ensure it reflects best practices.

This statement was approved by the Executive Leadership of Cactus Restaurants Ltd on May 30, 2024.

A handwritten signature in black ink that reads "Andrew Latchford". The signature is written in a cursive, flowing style.

Andrew Latchford  
President