

Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”)

Introduction, Organization and Structure

This report is being filed as a joint report (in accordance with section 11(2) of the Act) with respect to the activities of Capital Sports Holdings Inc. (“Holdings”), Capital Sports & Entertainment Inc. (“CSEI”) and Capital Sports Properties Inc. (“CSPI”) (collectively, Holdings, CSEI and CSPI are referred to herein as “Capital Sports”). The reporting period is from July 1, 2022 – June 30, 2023 (the “Reporting Period”).

This report is the first report prepared by Capital Sports pursuant to the Act and sets out the steps taken to prevent and reduce the risk that forced labour and child labour is used within Capital Sports’ supply chains, including in the production of goods, in Canada or elsewhere, or in goods imported into Canada.

Activities

Holdings is a privately owned company that is located in Ottawa, Ontario, Canada and is primarily focused on sports and entertainment. CSEI and CSPI are wholly-owned subsidiaries of Holdings. CSEI owns and operates the Ottawa Senators Hockey Club, a National Hockey League franchise, and operates brick and mortar and online retail stores which sell Ottawa Senators merchandise. CSPI owns and operates Canadian Tire Centre, a multi-purpose sports and entertainment venue.

Supply Chains

With respect to CSEI, its supply chain includes suppliers of the following goods: (i) Ottawa Senators merchandise sold as part of CSEI’s retail operations; (ii) promotional items for fan giveaways; and (iii) equipment used in connection with CSEI’s hockey operations. CSEI’s suppliers are located primarily in North America. By way of illustration, CSEI’s top 20 merchandise suppliers by spend are all located in Canada and/or the United States.

With respect to CSPI, its supply chain includes suppliers of goods used in connection with the operation and maintenance of Canadian Tire Centre, such as equipment and facility infrastructure and food and beverages.

Policies and Due Diligence Processes

Supplier Code of Conduct

Although outside of the Reporting Period, it remains relevant to indicate for the purposes of this Report that in 2024, Capital Sports is in the process of drafting and implementing a Supplier Code of Conduct that will, among other things, assist in ensuring that Capital Sports’ suppliers comply with laws and regulations relating to labour practices and human rights practices. With respect to child labour and forced labour specifically, the Capital Sports Supplier Code of Conduct will require that suppliers ensure there is no child labour or forced labour within their organization or within their own supply chains.

The Capital Sports Supplier Code of Conduct will also indicate that a supplier’s failure to comply with the Code may result in termination of that supplier’s relationship with Capital Sports, and that a supplier shall agree to meet with Capital Sports upon request, to review compliance with the Capital Sports Supplier Code of Conduct.

Legal Agreements

For suppliers with whom legal agreements are established, specific clauses obligating the supplier to adhere to the Capital Sports Supplier Code of Conduct will be developed and included in future legal agreements.

Part of Business and Supply Chain that Carry a Risk of Forced Labour and Child Labour

With respect to the supply of goods and services, Capital Sports assesses the risk of forced labour and child labour at being minimal to non-existent. The vast majority of Capital Sports suppliers are from geographies that have modern slavery or similar regulations in place, thereby substantially mitigating geographic/country risk.

With respect to its own workforce, Capital Sports believes that the risk of forced labour and child labour is non-existent. Capital Sports' human resources department oversees the application of specific human resource policies, helping to negate the risk of forced or child labour.

Remediation Measures

No incidences of child labour or forced labour were identified in Capital Sports activities or supply chain. Capital Sports therefore did not take any measures to remediate an instance of forced labour or child labour.

Training

No training was provided to employees on forced labour and child labour during the Reporting Period. Capital Sports undertakes to identify those employees who engage or conduct contract negotiations with suppliers and who therefore may require specific training with respect to forced labour and child labour in the supply chain. By the end of Capital Sports' 2025 fiscal year (ending June 30, 2025), training will be delivered to any identified individuals.


Effectiveness

No actions were taken during the Reporting Period to assess the effectiveness in preventing and reducing risks of forced labour and child labour in Capital Sports' activities and supply chains.

Approval and Attestation

This report was approved by the Board of Directors of Holdings, as being a joint report of Holdings, CSEI and CSPI, in accordance with subsection 11(4)(b)(ii) of the Act.

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 entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting period listed above.


[Michael Andlauer \(May 29, 2024 10:25 PDT\)](#)

Michael Andlauer
Chairman and Director, Capital Sports Holdings Inc.

I have the authority to bind Capital Sports Holdings Inc.

May 23, 2024


Capital Sports Report on Forced Labour and Child Labour - May 23.24


Final Audit Report


2024-05-29


Created:	2024-05-29
By:	Julie Wood (woodj@ottawasenators.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA_ZYpBeoDitf6Oa166IJ3FxFxLQUwEI0oV1


"Capital Sports Report on Forced Labour and Child Labour - May 23.24" History

 Document created by Julie Wood (woodj@ottawasenators.com)
2024-05-29 - 5:12:02 PM GMT

 Document emailed to Michael Andlauer (mandlauer@andlauer.ca) for signature
2024-05-29 - 5:12:36 PM GMT

 Email viewed by Michael Andlauer (mandlauer@andlauer.ca)
2024-05-29 - 5:24:47 PM GMT

 Document e-signed by Michael Andlauer (mandlauer@andlauer.ca)
Signature Date: 2024-05-29 - 5:25:04 PM GMT - Time Source: server

 Agreement completed.
2024-05-29 - 5:25:04 PM GMT