



## **Delta Bingo Inc.**

**Bill S-211 Report for the year ended March 31, 2024**

*Issued on: May 29, 2024*

## **Purpose**

This report is made pursuant to the 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. This report outlines Delta Bingo Inc.'s processes and procedures in place to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing April 1, 2023 and ending March 31, 2024.

## **Group Structure**

Delta Bingo Inc. was established in 2002 and operates under the business name Delta Bingo & Gaming ("Delta"). Delta currently operates 18 charitable gaming sites throughout the Province of Ontario, Canada ("Ontario") and owns a subsidiary corporation which operates 2 bingo and gaming centres in the State of Maryland, U.S.A.

## **Policies and Procedures**

The Delta senior executive team, comprising of the Chief Executive Officer, Chief Operating Officer and Chief Financial Officer have oversight of the company's strategic planning, including areas related to Environmental, Social and Governance ("ESG"). Furthermore, the ownership group has established a compliance committee comprised of various members of the senior management team to establish and maintain a company-wide set of standard operating procedures ("SOPs"). A compliance program is in place that includes the ongoing testing with an internal review completed by an internal compliance. The Director of Compliance has a directly reporting line to the ownership group.

## ***Employee Training***

All employees are required to adhere to the Delta SOPs with a formal acknowledgement and sign-off provided on an annual basis or whenever any updated versions are issued. In addition to this all employees are required to review and sign-off on an annual basis the Delta Employee Handbook, Code of Conduct and Oath of Confidentiality.

## ***Whistleblower Program***

Delta also maintains a whistleblower program administered by a third party with reporting sent to both ownership and the senior executive team to provide employees the opportunity to report any concerns on an anonymous basis free of intimidation and without fear of retaliation.

## **Supply Chain**

Delta provides an entertainment and hospitality experience to its customers. Suppliers to the business provide paper gaming product (bingo cards, break-open tickets, lottery tickets) and leased gaming software and equipment, as well as food for preparation and sale.

Delta a registered Charitable Gaming Operator in Ontario through the Alcohol and Gaming Commission of Ontario (“AGCO”). As well, all suppliers of gaming product, software and equipment are also required to be registered with the AGCO as Gaming Related Suppliers. Delta primarily procures goods from suppliers domiciled in Canada and the United States.

### **Supplier Relationships**

Prior to the onboarding of any new gaming suppliers, each supplier is vetted through the Charitable Gaming Association of Ontario on behalf of Delta and all other member Charitable Gaming Operators in Ontario. Delta operates 17 of their 18 locations in Ontario pursuant to a service provider operating agreement with the Ontario Lottery & Gaming Corporation (“OLG”). In these locations the OLG ‘conducts and manages’ the gaming operations and is also responsible to approve all gaming-related suppliers.

### **Forced and Child Labour**

Delta is committed to ensuring that our operations, and those of our suppliers, are in an environment under which the labour is voluntary and free from any form of involuntary labour or any type of human trafficking.

Delta operates within the gaming space which requires a significant portion of our work forces to be registered Gaming Assistants with the AGCO. Also given the nature of our operations, access to our facilities is only permitted to anyone 18 years of age and older, resulting in the employment of children to be prohibited.

### **Measures Taken**

Delta has not been made aware of any instances regarding the loss of income to vulnerable families as a result of the policies and procedures in place to reduce the risk of forced labour and child labour through its supply chain.

### **Summary**

Delta is committed to ensuring that our supply chain is preventing the risk of forced and/or child labour. Delta will continue to engage with its stakeholders, including employees and suppliers, to on these issues and to continue to enhance its approach to reducing the associated risks.

This report has been issued on behalf of Delta and approved by the ownership group and directors of the organization.

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 Delta Bingo Inc. 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.

*Cameron Johnstone*

Cameron Johnstone  
President, Delta Bingo Inc.

I have authority to bind the corporation

Dated: May 29, 2024