

Report Under the Fighting Against Forced Labour and Child Labour in Supply Chains Act




May 21, 2024

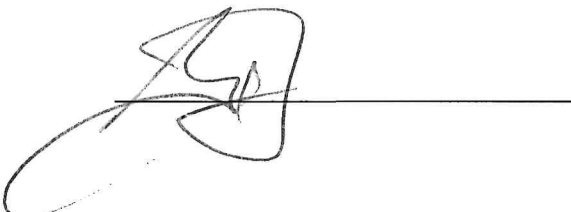
IDENTIFYING INFORMATION

Reporting entity's legal name	Genesis Hospitality Inc.
Financial reporting year ended	February 29, 2024
Business number	871186094
Identification of a joint report	Not applicable
Identification of reporting obligations in other jurisdictions	None
Entity categorization according to the Act	Corporation
Sector/industry	Hospitality
Location	Brandon, Manitoba, Canada

ATTESTATION

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in this report. Based on our knowledge, and having exercised reasonable diligence, 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.

Title **President**
Full name **Vionell Jacobson**
Signature 

Title **Vice-President**
Full name **Gary Buckley**
Signature 

Title **Secretary**
Full name **Allan Greiner**
Signature 

Date **May 21, 2024**

We have the authority to bind Genesis Hospitality Inc. and its subsidiaries.

1. The steps Genesis Hospitality group of companies has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Genesis Hospitality group of companies or of goods imported into Canada by Genesis Hospitality group of companies.

- a. Genesis Hospitality group of companies, its officers and managers, and its Human Resources staff consistently apply care and due diligence in complying with all labour laws and employment standards of the Provinces in which it operates, including the Employment Standards Code which specifies minimum wage standards, protection for young workers, and the payment of wages.
- b. Genesis Hospitality group of companies also complies with the Worker Recruitment and Protection Act of Manitoba and other similar legislations in its other Provinces of operation.

2. Genesis Hospitality group of companies structure, activities and supply chains

- a. Genesis Hospitality Inc. is registered in the Province of Manitoba and is the corporate parent of several corporations and partnerships that operate hotels across Canada.
- b. None of the individual hotel operations are “entities” within the meaning of the Act, but collectively Genesis Hospitality Inc. meets the reporting threshold.
- b. Genesis Hospitality Inc. is a privately-owned, for-profit company incorporated under the laws of Manitoba.
- c. The organizational structure consists of Hotel GMs reporting to a Regional Director who reports to the Executive Vice President. There is a standard chain-of-command structure.
- e. The number of employees is 1,000+.
- f. Genesis Hospitality group of companies provide hospitality through Hotels, Restaurants, Bars, Beer Vendors in Alberta, Saskatchewan, Manitoba, and Ontario.
- h. Genesis Hospitality group of companies purchase materials from domestic and international companies.
- i. Food is the largest volume supply used in Genesis Hospitality group of companies operations. We purchase food produced by North American growers and processors operating in North America.
- j. Genesis Hospitality group of companies supply chains include suppliers and manufacturers that are located in several countries. A very large majority of our suppliers are located in Canada and the USA. We have 2 or fewer suppliers located in European countries. Supplies from India, China, Bangladesh, Pakistan are all purchased through either Canadian or USA suppliers and redistributors.

3. Genesis Hospitality group of companies policies and due diligence processes in relation to forced labour and child labour

Genesis Hospitality group of companies has created a Supplier Code of Conduct that will be made available to all suppliers, agents, consultants, and other third parties and business partners, and their respective employees, directors, and officers through our website www.geneshospitality.ca.

Genesis Hospitality group of companies will also continually:

- Identify and assesses adverse impacts in operations, supply chains and business relationships
- Cease, prevent (where possible) or mitigate adverse impacts
- Track implementation and results
- Communicate how impacts are addressed
- Provide for and cooperate in remediation when appropriate

4. The parts of Genesis Hospitality group of companies business and supply chains that carry a risk of forced labour or child labour being used and the steps Genesis Hospitality group of companies has taken to assess and manage that risk

Risk: Materials and supplies that Genesis Hospitality group of companies procure for use in its operations coming from high-risk zones.

Response: Genesis Hospitality group of companies strives to deal exclusively with Canadian suppliers or trading houses. Genesis Hospitality group of companies communicates with suppliers and inquires about their products, practices and compliance forced labour and child labour laws.

5. Any measures taken to remediate any forced labour or child labour

Genesis Hospitality Inc. has not identified any instances of forced labour or child labour in its supply chain to date. As such, there has been no requirement to remediate the use of such labour or the resulting loss of income.

6. Any measures taken 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 its activities and supply chains

No measures have been taken in this area.

7. The training Genesis Hospitality group of companies have provided to employees on forced labour and child labour

Genesis Hospitality group of companies trains all employees in human trafficking awareness.

8. How Genesis Hospitality group of companies assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

As set out above, Genesis Hospitality Inc. deals with Canadian suppliers. Because purchases are ancillary to the company's hotel business and its suppliers also provide product to other hospitality businesses, Genesis Hospitality Inc. has not taken any specific steps to assess the effectiveness of forced labour and child labour prevention measures. While such measures are a laudable goal, they must be implemented at the importer level.