



GREAT CANADIAN

ENTERTAINMENT

MODERN SLAVERY ACT DISCLOSURE

A. INTRODUCTION

Our Commitment

Great Canadian Gaming Corporation, together with its subsidiaries and affiliated operating entities, including, without limitation, Raptor Parent Cop. and Ontario Gaming GTA Limited Partnership, doing business as One Toronto Gaming (“**One Toronto Gaming**” and, collectively “**Great Canadian Entertainment**”)¹, are committed to undertaking business in a responsible and ethical manner that support the communities in which we live and work. These are our foundational values and guide our corporate conduct.

This disclosure is published in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (also known as the “**Modern Slavery Act**” or the “**Act**”).² At Great Canadian Entertainment, our value is to “*Go for Great*” and we are committed to respecting human rights, including combating unethical labour and human trafficking, and we have adopted responsible policies and practices to safeguard our business operations against complicity in human rights abuses.

¹ Raptor Parent Corp. controls Great Canadian Gaming Corporation, a British Columbia Corporation, which in turn is a “**Reporting Entity**” and controls the following Reporting Entities, as such term is used and defined in the Act, and noting that its subsidiaries and affiliated operating entities that are not Reporting Entities are excluded from reference:

- Hastings Entertainment Inc., a British Columbia corporation
- Orangeville Raceway Limited, a British Columbia corporation
- Metropolitan Entertainment Group, a Nova Scotia corporation
- Georgian Downs Limited, an Ontario corporation
- Flamboro Downs Limited, an Ontario corporation
- Great Canadian Gaming (New Brunswick) Ltd., a New Brunswick corporation
- Chilliwack Gaming Ltd., a British Columbia corporation
- Great Canadian Entertainment Centres Ltd. a British Columbia corporation
- Ontario Gaming East Limited Partnership, an Ontario limited partnership
- Ontario Gaming West GTA Limited Partnership, an Ontario limited partnership
- Ontario Gaming GTA Limited Partnership, an Ontario limited partnership

² As a corporation with a place of business and assets in Canada, with at least C\$20 million in assets, at least C\$40 million in revenue, and an average of at least 250 team members in at least two of the last two financial years, Great Canadian Entertainment fulfils the requisite tests of qualifying as covered entity under the Modern Slavery Act. As a covered entity, Great Canadian Entertainment is required to file this disclosure under the Act as it fills the requisite requirements of producing, selling, or distributing goods in Canada, importing goods into Canada that were produced outside of Canada, and/or controlling subsidiaries that are engaged in the foregoing.

In this disclosure, we set out the steps taken by Great Canadian Entertainment during the fiscal year ended December 31, 2023, and describe the steps taken during 2023 to ensure our business was not knowingly involved in forced or child labour, as well as the actions we will continue to take to make sure we do not knowingly undertake business with any supplier involved in this fundamental human rights violation and exploitation of the vulnerable.

Our Required Disclosure

This disclosure details the steps taken by Great Canadian Entertainment during its 2023 fiscal year to reduce and prevent and the risk that child or forced labour was part of Great Canadian Entertainment's supply chain, including Great Canadian Entertainment's:

- Business, structure, and supply chains;
- Supplier policies and due diligence processes;
- Team member policies, training and management;
- Risk of using forced and child labour,
- Supply chain risk assessment;
- Supply chain risk management; and
- Remediation management, if required.

B. OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS

Our Business

Great Canadian Entertainment is Canada's leading gaming and entertainment company with the largest and most diversified collection of gaming and hospitality destinations across the country. Our twenty-five destinations in Ontario, British Columbia, Nova Scotia, and New Brunswick offer slot machines, live and electronic table games, restaurants, concert venues, racetracks, and hotels.

Our company was established in 1982 as Great Canadian Casino Company with two charity casinos on the grounds of Vancouver's Pacific National Exhibition. Since those humble beginnings, we remain steadfast in our commitment to provide exceptional entertainment experiences for our guests, rewarding opportunities for our team members, meaningful support for the communities where we live and work, and a commitment to responsible and ethical business operations.

Our commitment to excellence informs everything we do. At the root of this legacy of exceptional service are our over 8,000 team members who embody our values, operate with integrity, and possess an undeniable passion for fun and excitement.

Our Structure

Great Canadian Gaming Corporation is a British Columbia corporation, with multiple operating, holding and structural subsidiaries formed in jurisdictions in which we operate.

One Toronto Gaming is an Ontario limited partnership formed between subsidiary entities of our parent, Apollo Global Management, and Brookfield Asset Management.

Great Canadian Gaming Entertainment employs a total of 4,649 full-time and part-time employees, and One Toronto Gaming employs a total of 3,445 full time and part employees, who together serve all the Reporting Entities. All such team members are based in Canada.

Our headquarters are in located in North York, Ontario. Our team members work in our headquarters, as well as throughout our twenty-five destinations in the four provinces in which we operate.

Our Supply Chains

Our supply chains include suppliers of:

- Regulated gaming equipment, including slot machines, electronic table games, table games, card shufflers, casino management system technology, casino cash management technology, and ancillary equipment;
- Non-gaming equipment related information technology hardware and licensed and open-source software; and
- Office supplies, promotional materials, uniforms, development equipment, and other equipment.

Regulated gaming equipment manufacturers, suppliers, and distributors comprised approximately 79%³ of our aggregate supply chain in calendar year 2023, which are imported from:

- United States of America: 87%
- Mexico: 9%

³ In accordance with the Act, suppliers within Canada are not addressed.

- Great Britain: 2%
- China: 2%
- South Korea: 1%

Such suppliers are highly regulated in their jurisdictions of operation, manufacture, distribution and supply by federal, state, provincial, other governmental, and quasi-governmental regulatory authorities with jurisdiction over such suppliers that undertake significant compliance and regulatory due diligence investigations of the corporate entities, directors, officers, and key employees prior to granting the privileged licenses, registrations and approvals required for their operations, manufacture, distribution and supply. Such regulatory authorities require ongoing affirmative disclosure by all such entities and individuals on a regular cadence, as well as strict adherence to regulatory compliance requirements governing the operation, manufacture, distribution, and supply of their goods.

The balance of our supply chain is comprised of non-gaming related information technology related hardware and software, development and general equipment, which is imported from:

- United States of America: 94%
- Philippines: 6%

Almost all such suppliers are required to take steps to prevent modern slavery and human trafficking, including forced and child labour, in their own businesses and supply chains, under applicable regulatory requirements in their resident and supply jurisdictions, including under the requirements of the United States Department of Health and Human Services, Administration for Children and Families, Office on Trafficking in Persons and the *United Kingdom Modern Slavery Act 2015*.

In addition, Great Canadian Entertainment has an Environmental, Social and Governance ("**ESG**") working group under the direction of the Board of Directors, which is the foundation of our ongoing stakeholder engagement and corporate responsibility initiatives. The mandate of this working group is to create a multi-year unified ESG strategy that is resourced, tracked, and reported to key stakeholders and builds on our history and commitment to operate in an ethical and sustainable manner. We view ESG as an enabler of our strategic goals, a risk mitigant, and an important component of our core values of integrity, service excellence, and connection to communities, which includes engaging in ethical and responsible procurement practices.

C. OUR SUPPLIER POLICIES AND DUE DILIGENCE PROCESS

We have zero tolerance to forced or child labour in any part of our business or in our supply chains. Great Canadian Entertainment regularly updates its supplier policies and due diligence processes to meet our commitment of ensuring there is no forced or child labour in our supply chains and operations.

Our Supplier Policies

Key criteria for doing business with Great Canadian Entertainment includes providing the best value in price and quality, understanding our industry, being financially stable, and being transparent about ethical business practices.

We have a dedicated Procurement Services team. In 2024, we adopted a Service Provider Code of Conduct to ensure a controlled, transparent, auditable, and compliant procurement service, which is approved by members of Senior Management. Under the Service Provider Code of Conduct, all suppliers, service providers, consultants, contractors, and licensees are required to undertake the following on their own behalf and on behalf of their subcontractors, agents, representatives, personnel, employees, and licensees:

- Attest to their adherence to and comply with all requirements set out in Service Provider Code of Conduct;
- Adhere to all federal, provincial and other applicable laws;
- Maintain a workplace free from all forms of prohibited conduct, including harassment, and treat its personnel with dignity and respect;
- Ensure that no forced, child or involuntary labour, including bonded, indentured, involuntary prison labour or slave labour is used in its supply chain;
- Promote responsible sourcing practices throughout its supply chain;
- Uphold fair business standards in advertising, sales, and competition, including, without limitation, compliance antitrust and competition applicable laws;
- Neither engage in nor tolerate association with any form of corruption, bribery, extortion, or embezzlement;
- Report all conflicts of interest;
- Deliver all required certifications, including those regarding diversity, certificates of insurance, and in some instances, complete registrations with the applicable gaming regulatory authority; and

- Maintain Great Canadian Entertainment’s confidential information.

Our Due Diligence Process

Our Procurement Services team take supplier management and performance seriously. To ensure all those in our supply chain comply with our values, we have a rigorous supply chain compliance program in place.

Decisions on potential suppliers are taken based not only on price and delivery times, but other factors including the supplier’s privileged licenses in the jurisdictions in which it does business, the results of our due diligence investigations, the ability to perform its obligations while maintaining compliance with applicable laws, and, where the supplier has previously been engaged by us, its prior attornment with our requirements. We are continually seeking to work with suppliers that meet all our values, which allows us to build strategic, long-term relationships.

By working with Great Canadian Entertainment, suppliers accept the terms of our Service Provider Code of Conduct, which sets out Great Canadian Entertainment’s expectation that our partners, including suppliers and anyone they work with, deliver products to Great Canadian Entertainment that comply with the principles in the Service Provider Code of Conduct, including the organization’s zero tolerance policy to knowingly engaging in forced, child or involuntary labour or human trafficking in any part of its business or in its supply chains, and share Great Canadian Entertainment’s commitment to conducting our respective businesses with integrity and in an honest and ethical manner.

Our Procurement Services team works closely with our Legal, Compliance and Information Security teams, to complete appropriate due diligence analyses to ensure that prospective suppliers are qualified to conduct business with Great Canadian Entertainment, which includes:

- A fulsome independent third-party background check of the supplier;
- An assessment of potential operational risks that may be posed by the supplier;
- Validation the supplier maintains appropriate insurance coverage; and
- Such other due diligence as necessitated by the regulatory, technological, financial, or geographic operations, provisions, or sourcing requirements of the supplier.

On a periodic basis, our Internal Audit Department completes independent assessments related to such due diligence analysis and the organization’s adherence to its requirements.

Purchases from suppliers are generally made using either standardized contract forms or a standard set of purchase order terms and conditions, which typically include:

- An obligation on the supplier to comply with applicable laws;
- Audit rights for Great Canadian Entertainment or an independent third-party representative to verify the supplier's compliance with the terms;
- As of 2024, a representation and warranty from the supplier that neither it nor any employee has been convicted of any forced or child labour offence, nor been the subject of any investigation into any alleged forced or child labour offence;
- As of 2024, a requirement for the supplier to provide a copy of its internal policy addressing forced and child labour and modern slavery and human trafficking, or, in the absence of a documented policy, confirm with compliance with specific applicable laws in the contract or purchase order;
- As of 2024, a requirement for the supplier to acknowledge its compliance obligations with our Supplier Code of Conduct; and
- The right for Great Canadian Entertainment to immediately terminate the agreement if the supplier breaches its compliance obligations, applicable laws, or the agreement.

Any supply agreements made on the supplier's terms are reviewed and negotiated by our Procurement and Legal teams to ensure that the supplier is obliged to comply with all applicable laws and to include our required standard contractual provisions.

D. OUR TEAM MEMBER POLICIES, TRAINING AND TRAINING

Our Team Member Policies

Our commitment to human rights is outlined and enforced in our team member policies and concordant training, which collectively requires Great Canadian Entertainment's team members to uphold the human rights of all persons. We do not knowingly conduct business with any individual or company that participates in the exploitation of children, including child labour, physical punishment, forced labour, or human trafficking.

Relevant corporate policies, which are approved by members of our Senior Management and apply to all team members across Great Canadian Entertainment, reflect and enforce our commitment to conduct our business in a responsible and ethical manner, include our:

- Corporate Team Member Handbook;

- Corporate Ethics and Conduct Manual;
- Human Trafficking Policy;
- Anti-Bribery and Corruption Policy;
- Anti-Discrimination Policy;
- Anti-Money Laundering Policy;
- Respectful Workplace Policy;
- Responsible Gaming Policy;
- Cybersecurity Policy;
- Data Privacy Policy; and
- Whistleblower Policy.

These requirements, policies and their training express Great Canadian Entertainment's commitment to a work environment that is safe and free from any kind of discrimination, harassment, intimidation and to conduct business in an ethical and honest manner. A breach of these policies may result in disciplinary action, including termination of employment. The Whistleblowing Policy encourages team members to report instances of actual or suspected unethical, illegal, or fraudulent conduct by our team members or third parties, which may include, without limitation, non-compliance with the Human Trafficking Policy, the Service Provider Code of Conduct, or other suspected or alleged instances of human trafficking or child or forced labour.

Our policies, including links to educational and training resources, are available to all team members on our organization's intranet site.

Our Team Member Training and Management

Great Canadian Entertainment has an established training program in place for our team members to build knowledge and apply understanding on all our policies. Each of our policies has specific related training and testing that must be successfully completed; new team members complete training within 30-days of hire and then annually.

In January 2023, we launched our Human Trafficking Policy and Preventing Human Trafficking training module enterprise wide to support upskilling our team members to recognize and respond to potential signs of human trafficking, which includes training on child and forced labour. All incumbent team members were required to complete this training within 90-days and are required to take the module on an annual basis. New team members complete this training within 30-days of hire and annually.

Our commitment to operating ethically and in alignment with our policies, such as the Human Trafficking Policy and related training, are further reinforced through our Corporate Ethics & Conduct Manual, which is reviewed annually and updated as needed, and team members review and acknowledge their understanding each Spring. This manual details team members' commitment to working in alignment with our policies and their obligation to report behaviour that is in contravention of policy or law.

Great Canadian Entertainment is continually reviewing its team member policies and trainings, including those that relate to responsible and ethical sourcing or forced labour, to ensure that we are providing our team members with the skills, training and information that represents our organization's fundamental values.

E. OUR RISK OF USING CHILD AND FORCED LABOUR

We are aware that our global supply chain as well as the industry in which we operate present a risk of child and forced labour.

Great Canadian Entertainment maintains a robust Compliance team, led by our Chief Compliance Officer, with Compliance team members located regionally. These team members, together with our Procurement, Legal and Information Security teams ensure new business initiative analysis is undertaken and suppliers to such initiatives undergo appropriate robust due diligence analysis, including risks regarding child and forced labour, to ensure that prospective suppliers are qualified to conduct business with Great Canadian Entertainment.

Purchases from suppliers are generally made using either standardized contract forms or a standard set of purchase order terms and conditions, both of which include an obligation on the supplier to comply with applicable laws, audit rights for Great Canadian Entertainment or an independent third-party representative to verify the supplier's compliance with the terms of such contract or purchase order, and the right of Great Canadian Entertainment to terminate such agreement in the event of non-compliance. As of 2024, the standardized contract forms included a specific requirement to comply with the Act, notwithstanding that, *de facto*, the obligation to comply with applicable laws includes such compliance.

Additionally, the Service Provider Code of Conduct provides Great Canadian Entertainment with audit rights throughout the term of the relationship with the supplier and, at a minimum, termination rights in the event of non-compliance.

In the aggregate, our compliance, due diligence, contractual, audit, and termination requirements mitigate the opportunity for and risk of child and forced labour existing in our supply chain.

F. OUR SUPPLY CHAIN RISK MANAGEMENT

Great Canadian Entertainment is committed to working with its suppliers to evaluate, monitor and strengthen compliance with applicable laws regarding forced labour in supply chains and to evaluate opportunities for risk elimination. Our Procurement, Legal, Compliance and Operations teams are vigilant in their communications with our suppliers, as well as representatives in the industry, to remain aware of our suppliers' conduct. Our suppliers are required to monitor and report their own non-compliance or violations in accordance with the Service Provider Code of Conduct, which will be escalated to both the Compliance and Legal teams as necessary.

In addition, Great Canadian Entertainment encourages the reporting of any activity inconsistent with our policies by our team member or third parties, including our Corporate Ethics and Conduct Manual, and any incidents of suspected child and forced labour or human trafficking.

Our whistleblower hotline is available twenty-four hours a day, seven days a week to all team members. Reporters to the whistleblower hotline call a toll-free number or use an online, secure web portal to ask questions or report questionable conduct. Great Canadian Entertainment's Chief Compliance Officer and Chief Human Resources Officer also receive reports by telephone and email. Reporters may elect to remain anonymous. In all instances, we will protect anyone suspected of being victims of or witnesses to prohibited activities. Great Canadian Entertainment has a zero-tolerance policy against retaliation. Any team member who violates this policy will be subject to appropriate discipline or termination of employment.

We will also cooperate fully with any child and forced labour or trafficking-related audits and investigations by any regulatory authority, including providing reasonable access to our facilities and staff.

G. OUR SUPPLY CHAIN RISK ASSESMENT

Our assessment of our operational and supply chain risk falls within a broader enterprise-wide risk management framework, which is reviewed by our Chief Executive Officer and our Senior Management on a quarterly basis. This process is designed to assist our organization in appropriate risk management through a systematic approach for evaluating, measuring, and monitoring key risks, including regulatory compliance, prioritize risk management activities, and develop a risk-based internal audit plan.

In addition, we are continually reviewing our pillars of governance, policy accountability, compliance and due diligence obligations, team member engagement, enterprise risk management, auditing, and investigation mechanisms to determine appropriate improvements to organizational obligations and requirements to limit risks within our supply chain.

H. MANAGING REMEDIATION

To date, Great Canadian Entertainment has faced no known situations of forced labour or child labour in its business or supply chains and therefore has not had to remedy or rectify such situations internally, with our suppliers, or remediate vulnerable families' loss of income resulting from the elimination of labour abuses in its supply chains.

In the event that Great Canadian Entertainment faces such situations in the future:

- With our team members, we will take all appropriate conduct available under policy and applicable law, which may include, without limitation, discipline up to and including termination, and reporting to and enforcement by applicable regulatory or other governmental authority;
- With our suppliers, we will consider all courses of conduct available under the Service Provider Code of Conduct, contract, and applicable law, which may include, without limitation, termination of all contractual arrangements with such supplier, pursuit of all remedies available at law or equity, including injunctive relief and damages, and reporting to and enforcement by applicable regulatory or other governmental authority; and
- Impacting vulnerable families' loss of income resulting from the elimination of labour abuses in supply chains, we will consider all appropriate conduct to materially remediate such loss of income.

[Approval and attestation follows]

BOARD APPROVAL

This disclosure has been approved by the board of directors of Raptor Parent Corp. and Great Canadian Gaming Corporation, on behalf of its subsidiaries and affiliated operating entities, and the board of directors of 2569129 Ontario Inc. in its capacity as General Partner of Ontario Gaming GTA Limited Partnership.

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 this disclosure for Great Canadian Gaming Corporation, on behalf of the Reporting Entities. 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 2023 reporting year, as of May 29, 2024.



Jordan Banks

Executive Chairman of the Board
Raptor Parent Corp.
I have capacity to bind the corporation



Matthew Anfinson

Chief Executive Officer & Director
Great Canadian Gaming Corporation
I have capacity to bind the corporation



David Nowak

Chairman of the Board
2569129 Ontario Inc.
in its capacity as General Partner of
Ontario Gaming GTA Limited Partnership
I have capacity to bind the corporation