

May 31, 2024



2024 REPORT ON 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

Groupe Tsatas Inc.

Capital Traiteur Montreal Inc.

Capital HRS Inc.

Capital Traiteur Gatineau Inc.

FINANCIAL REPORTING YEAR: April 1 2023 to March 31 2024

# Report under the Fighting against Forced Labour and Child Labour in Supply Chains Act (Canada)

## Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. The present report is a joint report for Groupe Tsatas Inc. and its subsidiaries which have an obligation to publish a report under the Act (collectively, “Groupe Tsatas” or “Companies”). The entities in scope are:

- Groupe Tsatas Inc.
- Capital Traiteur Montreal Inc.
- Capital HRS Inc. and
- Capital Traiteur Gatineau Inc.

This report refers to the 2024 fiscal year end (“attestation period”), being March 31, 2024 for all the 4 entities in scope, and describes steps taken by the Companies in 2024 to manage the risks of child labour and forced labour in its supply chains and activities.

## Structure

All the Companies in scope are corporations organized under the laws of Canada. The registered office for all 4 entities is 1830 boulevard Chomedey, Laval, Quebec, H7T 2W3.

## Activities

For over 30 years, Groupe Tsatas has been serving the three main hubs of business tourism in the province of Quebec. Whether in Montreal, Quebec City or Gatineau, our teams create unforgettable moments for the guests who visit us. We have developed an expertise for a wide array of events, combining logistical feats and culinary agility in the organization, planning and reception, while providing with a memorable gastronomic experience. We believe that what happens at the table is as crucial as what happens in the kitchen. Our talented team of servers and maîtres d’hôtel makes sure that every moment of the service is meticulously choreographed, so guests can fully enjoy their experience.

Groupe Tsatas is highly committed to sustainability principles, for key drivers pertaining to the environment and social responsibility. Our terroir is rich yet precious. That’s why we are committed to minimizing waste, with chefs who prioritize sustainability. Ingredients are utilized to their fullest potential, and any surplus food is redistributed to local organizations. We embedded various programs such as:

- Recycling and composting: Our teams are trained and dedicated to reducing our ecological footprint, which includes waste sorting and composting. We also make concerted efforts to collaborate with producers and distributors who are committed to sustainable development.
- Product transformation: Our kitchen teams work diligently to showcase the full potential of local ingredients. Due to the richness and rarity of these resources, our chefs take pride in crafting various homemade staples, such as sauce bases and spice blends, to create even more flavourful dishes.

- Food donation: Every day, our teams reduce food waste by producing only the necessary amounts of food for each event. Surpluses are redistributed to organizations we have partnered with for over 12 years, such as the Association Madame Louise Brissette, Les Enfants d'Amour and La Maison du Père.

## Supply Chains and Assessment of Parts that Carry a Risk of Forced Labour or Child Labour

Our primary supply chain is exclusively based in Canada as we buy directly from suppliers that operate in Canada. We buy from local food, supplies, and beverage producers and/or distributors. Our supply chain is composed of several suppliers that are very large industry leaders, from which the total purchases represent the majority of the value of our total purchases. These well-established and reputable organizations have various established practices with regards to human rights standards. We also source products from smaller and local suppliers. We have long-lasting relationships with most of these suppliers, and have visited their premises and have never identified any situations indicating the presence of child labour or forced labour.

We assess the risk of child labour and forced labour in our primary supply chain to be low, as Canada is characterized by low risk of child labour and forced labour practices, as it is renowned for sound labour laws.

We nonetheless acknowledge that the risk of forced labour and child labour exists, given that the supply chain of our suppliers has a global footprint and therefore extends into regions potentially facing greater risk of forced labour and child labour.

Our workforce is also entirely based in Canada. We hire permanent and temporary employees and also engage additional workforce through agencies. Our internal human capital policies are sound and we comply to Canadian labour laws. Our management team is in close contact with our workers and has the assurance that our Companies have a very low risk of child labour and forced labour practices. In our daily operations, we collaborate with a select group of agencies that provide us with temporary workforce, with whom we have transacted for multiple years. We are well acquainted with these vendors and have historically encountered no issues with regards to child labour or forced labour. In addition, those agencies have a sound understanding of Canadian immigration and labour laws.

## Policies and Due Diligence processes in relations with Forced Labour and Child Labour

### Food, supplies and beverages supply chains

Groupe Tsatas' supply chain is mostly composed of large institutional suppliers with which we have long-lasting business relationships. We performed, after the attestation period, a research to map the various sustainability initiatives disclosed by our major vendors, focusing on initiatives pertaining to child labour and forced labour. We mapped key initiatives implemented by our vendors that address how they govern and manage the risk of child labour and forced labour, such as:

- Sustainability reports, that cover their approach to managing child labour and forced labour risks
- Modern slavery Act compliance Statement
- Supplier Code of conduct, that specifically address child labour and forced labour
- Other information disclosed on the respective corporate Websites, on sustainability and more specifically on the risks of child labour and forced labour.

The information gathered allows us to conclude that we carry business with large and sophisticated suppliers that have sound practices with regards to the management of forced labour and child labour risks. We will continue to monitor the sustainability programs and disclosures of our major suppliers.

For smaller and local suppliers, we performed an informal assessment as we have long-lasting relationships with most of these suppliers, and have visited their premises and assess the risks of child labour and forced labour to be low. We will also perform additional steps in the near future to gather information with regards to these suppliers and the steps they have taken to manage the risks of child labour and forced labour in their supply chain.

#### Workforce (employees and recruited through agencies)

We have sound recruitment and human capital management practices to ensure that we comply to Canadian labour laws. As for our agencies, we engage with vendors that are well-acquainted with Canadian immigration and labour laws and that have sound governance and business practices. Nonetheless, we will further engage with our agencies to perform additional due diligence with regards to the risks of child labour and forced labour.

## Remediation and Assessing Effectiveness

Throughout our various interactions, we have never encountered issues suggesting the existence of child or forced labour. As a result, there have been no occurrences requiring taking any measures to remediate any forced labour or child labour. As such, we have not taken any measures 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 supply chain related activities.

Due to insufficient and/or our lack of formal practices and timeliness, we have been partially effective in implementing and monitoring policies and procedures in regard to ensuring that forced labour and child labour are not being used in our supply chains as per the S-211 guidelines. We are also committed to formalize our practices and will implement initiatives in the near future.

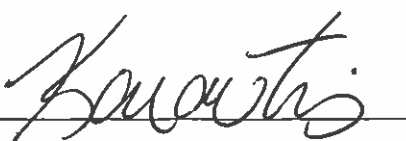
## Training

During the reporting period, Groupe Tsatas is committed to acting ethically and with integrity in all business relationships, which represent core values of the organization. Recognizing that the potential risk of forced labour and child labour resides with its supply chain, Groupe Tsatas will most notably, but not exclusively, provide training on the topic to those employees involved in supply chain and procurement activities.

## 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 the report. 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.

I have the authority to bind Groupe Tsatas.

Per: 

Full Name: Tom Karavitis

Title: Controller

Date: May 31 2024

I have the authority to bind Groupe Tsatas Inc. and all entities in scope