



**HOCO LIMITED**

**2023 Annual Report**

**Pursuant to Bill S-211**

**Fighting Against Forced Labour and Child Labour in Supply Chain Acts**

# Hoco Limited

## OUR MISSION STATEMENT

“To be the Resort of Fun by the Falls, where we consistently deliver excellent service, quality products and a great guest experience.”

Located on Clifton Hill in Niagara Falls, Ontario, Hoco Limited plays a major role in attracting over 12 million visitors, from all over the world, to the city annually. Hoco Limited operates year-round, offering guests food and beverage venues, retail outlets and world-renowned attractions, including the Niagara Skywheel.

Bill S-211 (Fighting Against Forced Labour and Child Labour in Supply Chains Act), requires entities meeting certain criteria to report annually on actions taken during the previous fiscal year to prevent and reduce the risk that forced labour or child labour is used within their operations and immediate supply chain. This report is for Hoco Limited.

## Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

At Hoco Limited, we are committed to contributing to prevent forced labour and child labour within our organization and in our supply chain. We recognize that this endeavor is a continuous process and we are committed to making advancements each year. Since becoming aware of our requirement to report under this Act, effective January 1, 2024, we have done the following:

- implemented a Supplier Code of Conduct consistent with Hoco Limited’s Code of Business Ethics as detailed in the company Policies and Procedures Manual
- provided the Supplier Code of Conduct to our supply chain members for their approval and acceptance
- communicated our obligation under the Act to our Human Resources department and added the requirement during the recruitment process, that they specifically address the issue of forced labour and child labour to job applicants and ensure that employment is being sought voluntarily

## Structure, Activities and Supply chain

### Structure

Hoco Limited is a Canadian corporation which employs approximately 40 full time salaried employees and approximately 900 hourly employees. Our busiest months are July and August.

### Activities

#### Food and Beverage

##### Franchise Brands

Boston Pizza

Kelseys

Tim Hortons

Wendys

##### Retail

Canada Trading Company

Fudge Factory

#### Concessions

Downhill Ice Cream

Funnel Cakes

Hot Dogs

Speedway Dip N Dots

Treats

Waffle Cones

#### Attractions

Niagara SkyWheel

Speedway Go Karts

Great Canadian Midway

Carnival Chaos

Dinosaur Golf

Wizards Golf

Movieland

Zombie Attack

Ghostbusters

XD Theatre

Strike Rock N Bowl



  
**Clifton Hill**  
FUN BY THE FALLS

## Supply Chain

Our supply chain involves purchasing goods and services primarily from Canadian and US companies. Our major suppliers for 2023 are listed below:

2 BLUE DUCKS	CTG BRANDS	ICEE-CANADA INC.	NORTHERN SOUVENIRS
521212 ONTARIO INC.	DANBAR DISTRIBUTION LIMITED	IMPACT PHOTO GRAPHICS, INC.	OLYMPIC WHOLESALE CO. LTD.
A&F GIFT AND SOUVENIR CO. LTD.	DAWN FOOD PRODUCTS	INCREDIBLE NOVELTIES INC.	P.M.L. FOODS
A. LOCOCO WHOLESALE LTD.	DIAGEO CANADA	J&J DESIGNS CANADA INC.	PACIFIC CANDY WHOLESALE
A. TRADING AND CONTRACTING	DIPPIN' DOTS LLC	J.L. INC.	PANABO SALES LTD.
A.T. STORRS LTD.	DOWNAR INTERNATIONAL	JACQUELINE KENT-INNER CIRCLE INC.	PARKDALE NOVELTY CO. LTD.
ABBOTT	DUBLIN DESIGN INC.	JAFSONS INTERNATIONAL	PAVILION GIFT COMPANY
ADVANTAGE PACKAGING LTD.	DUBWEAR CLOTHING COMPANY	JAKEMAN'S MAPLE PRODUCTS	PEAK TIME TRADING CORP.
AERUS ELECTROLUX	EASTLAKE STUDIOS	JIMMY ZEE'S DISTRIBUTORS INC.	PINETREE INNOVATIONS LTD.
AGM BAKERY	ECOLAB LTD.	JOHN VINCE FOODS	POPPA CORN CORP.
AGROPUR DAIRY COOPERATIVE	EDENBOROUGH LIMITED	K&M TOYS CANADA	PRIME DEALS INTERNATIONAL LTD.
ALLISON'S FINE FOODS	EMPACK SPRAYTECH INC.	K.C. BREWER & CO.	PUKA CREATIONS LLC
AMANDA WHOLESALE	ENESCO CANADA CORPORATION	K.C. GIFTS	PYRAMID AMERICA LP
ANDREA CHOCOLATES	EUGENE CLOUTIER INC.	KAUMEYER PAPER PRODUCTS	QUEENBALM
ANDREW PELLER LIMITED	EVEREST WHOLESALE	KWIK COPY PRINTING	QZINA SPECIALTY FOODS INC.
ARTERRA WINES CANADA, INC.	FALLS WHOLESALE LTD.	LEESE ENTERPRISES INTERNATIONAL	UPPER CANADA SOAP & CANDLE MAKERS
ATA BOY	FILL-A-NICHE TRADING CO. LTD.	LINDE CANADA INC.	REGAL CONFECTIONS INC.
ATTITUDES IMPORT INC.	FLAG MATRIX INC.	LIQUOR CONTROL BOARD OF CANADA	RHODE ISLAND NOVELTY
ATTRACTION INC.	FLANAGAN FOODSERVICE INC.	LIVINGSTON CUSTOMS BROKERS	RM OUTFITTERS INC.
AVONDALE DAIRY BARS	FLEXO PRODUCTS LTD.	LUDIK DESIGNER CONFISEUR	ROGERS CHOCOLATES LTD.
BAIN PRINTING	FRESH START FOODS CANADA LTD.	LUG CANADA INC.	ROYAL SPECIALTY SALES
BLACK CAT IMPORTERS INC.	G T FRENCH PAPER LTD.	M.T. TRADE	SPECIALTY TOYS DIRECT
BLACKBURN BREW HOUSE	GALE'S FUELS	MAPLE CREEK TRADING LTD.	SPLASH INTERNATIONAL
BOCHI BROTHERS ACCESSORY NETWORK	GARFINKEL PUBLICATIONS INC.	MARVIN CANDY & DISPLAYS	SPORTS ART COLLECTION
BONDI PRODUCE	GARY GURMUKH SALES LTD.	MCINTOSH TRADING	STONE AGE
BREWERS WAREHOUSING CO. LTD.	GENERATIONS WINE COMPANY LTD.	MEDINA PALAIS INC.	STUFFED ANIMAL HOUSE
CANADA COTTON CANDY	GERTEX HOSIERY INC.	MERCURY	SURAJ ENTERPRISES INC.
CANADIAN GIFT CONCEPT CORP.	GESTION SERGE GOUDREULT INC.	MGW SALES	SWEET N FUN PRODUCTS LTD.
CARAVAN SOFTOYS	GIFT WORKS PLUS	MILL ST. BREWERY	SYSCO SOUTHWESTERN ONTARIO
CHANTIA SALES	GIFTCRAFT LTD.	MINUS 50 FOODS INC.	TFI FOOD SERVICE EQUIPMENT
CHOCOSTYLE INC.	GOURMET DU VILLAGE	MONAGUE NATIVE CRAFTS LTD.	THE POSTCARD FACTORY
CHRISTMAS TRADITION	GROUPE RICOCHET	MULBERRY STUDIOS	TIM HORTONS
CLS SALES INC	HANDEE PRODUCTS CO.	MUSKOKA BREWERY	TURKEY HILL SUGARBUSH LTD.
COLIO ESTATE WINES	HARMAN INVESTMENTS LTD.	NAYCO	TIM HORTONS
COMPASS FOOD SALES	HEART INDUSTRIES LTD.	NIAGARA HABANERO LTD.	TY (CANADA) LLC
CONCESSIONS CARAVANE (1986) INC.	HISTORY & HERALDRY CANADA	NIAGARA RIVER TRADING CO.	WHEELER CANADA DISTRIBUTION
CREEMORE SPRINGS BREWERY	HOME SWEET HOME CANDLES	NMR DISTRIBUTION	WONDERLAND FOOD & EQUIPMENT INC.



## **Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

Our Code of Business Ethics provides the foundation of Management's expectations in regard to our operational activities. Hoco and its Team Members must maintain the highest ethical and legal standards in their dealings with our customers, suppliers, government and elected officials and competitors. We recognize that only lawful, honest and ethical behaviour will safeguard our interests, stated policies and reputation. Through our newly implemented Supplier Code of Conduct, we expect our supply chain partners to abide by the policies and standards set out therein in order to provide an ethical, safe work environment for all workers.

Hoco Limited also has numerous Human Resource policies and procedures as well as a Health and Safety Committee to support our efforts to maintain a safe and ethical work environment.

## **Risk of Forced Labour or Child Labour and Steps to Assess and Manage that Risk**

Hoco Limited acknowledges that some aspects of our supply chain may present a risk of forced labour or child labour. We believe the possible risk lies further down the supply chain rather than with our tier one (direct) suppliers. Methods of identifying and managing this risk include:

- Insisting that our Team Members adhere to our Code of Business Ethics
- Communicating our newly implemented Supplier Code of Conduct to our supply chain partners
- Engaging with Team Members to make them aware of the potential risks for forced labour and child labour and to report any instances to Management

## **Measures Taken to Remediate any Forced Labour or Child Labour**

To date, we have not identified or been apprised of any occurrences of forced labour or child labour in our operational activities or immediate supply chains.

### Measures Taken to Remediate Loss of Income to the Most Vulnerable Families

To date, we are not aware of any loss of income to vulnerable families from measures taken to eliminate the use of forced labour or child labour in our operational activities or immediate supply chains.

### Training Provided to Employees on Forced Labour and Child Labour

At Hoco Limited, it is a requirement that all new Team Members complete and fully understand all onboarding training exercises. Team Members are also required to abide by the company Code of Business Ethics.


To advance Hoco Limited's commitment to preventing and reducing forced labour and child labour, we plan to add additional training to new Team Member onboarding requirements.

### Assessing Effectiveness

As mentioned in the report, Hoco Limited has introduced measures to prevent and reduce the risks of forced labour and child labour, however, to date, no actions have been taken to assess the effectiveness of these measures.

### Approval and 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 for the entity listed above. 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.

  
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Harry N. Oakes  
President, Hoco Limited

  
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Date

I have authority to bind the Corporation