

Report by MGE Niagara Entertainment Inc.**May 31, 2024****Requirement (a): Structure, Activities and Supply Chains**Structure

MGE Niagara Entertainment Inc. (“MGE”), operator of Casino Niagara and Niagara Fallsview Casino Resort (the “Niagara Casinos”) is an Operational Enterprise Agency of the Government of Ontario which authorizes the operation of gaming premises in the Province of Ontario pursuant to the *Ontario Lottery and Gaming Corporation Act, 1999*, S.O. 1999, c. 12, (the “*Ontario Lottery and Gaming Corporation Act*”) as amended, including the commercial casinos operating in the City of Niagara Falls, Ontario, Canada (namely, the Niagara Casinos).

MGE does not have employees and does not employ the employees of the Niagara Casinos, but rather they are employed by Complex Services Inc. (“CSI”). Specifically, CSI is an Ontario corporation that provides human resources and staffing services to assist in the operation of the Niagara Casinos. Currently, CSI has approximately 3,000 active employees.

Activities

MGE is in the gaming, entertainment, hospitality, and food and beverage industry and the Niagara Casinos are located in Niagara Falls, Ontario, Canada. To serve its customers, MGE sources products and services from qualified vendors that meet MGE’s internal requirements, as well as the requirements and standards established by the Alcohol and Gaming Commission of Ontario (the “AGCO”), the Ontario Lottery and Gaming Corporation (“OLG”), and other applicable laws.

The vast majority of MGE’s purchases of products and services are directly sourced from Tier 1 vendors based in Canada. MGE also purchases products/services from a limited number of vendors based in the USA, who primarily provide products/services related to gaming and information technology (“IT”) systems. MGE sources less than one percent (1%) of products and services from vendors located outside of North America, and those vendors are primarily located in Europe, providing gaming and IT products/services.

MGE does not produce, manufacture, grow, extract, process, or distribute any goods. MGE only sells its goods (i.e. food/drink produced in its hospitality/food and beverage) at the Niagara Casinos, located in Niagara Falls, Ontario, Canada.

Supply Chain

MGE is governed by the *Ontario Lottery and Gaming Corporation Act*, and as such, is required to follow established policies and guidelines with respect to sourcing and purchasing materials. MGE’s vendors are broadly classified as “gaming related suppliers” or “non-gaming related suppliers” (described further below).

Gaming Supplier

“Gaming Suppliers” provide MGE with equipment and services that are directly related to the play or operation of a gaming site (i.e. the Niagara Casinos). These vendors must be registered with the AGCO before MGE is permitted to conduct business with them. Specifically, all Gaming Suppliers are required to qualify and meet the established requirements outlined by the AGCO in order to become a licensed vendor. Gaming Suppliers are also required to periodically renew their registration with the AGCO. Gaming Suppliers used by MGE are highly specialized, industry leaders and a vast majority of them operate their businesses in North America.

Non-Gaming Supplier

While “Non-Gaming Suppliers” provide MGE with equipment and services that are not directly related to the play or operation of a gaming site, they are still required to be registered with the AGCO, unless they qualify for an exemption. Non-Gaming Suppliers primarily provide products and services related to MGE’s hospitality/ food and beverage operations. MGE promotes local business and operations to support the local community and to ensure there is transparency within its supply chains. MGE’s Non-Gaming Suppliers provide a variety of products and services (including but not limited to, food and drink items, hotel amenities such as toiletries and linens and laundry products). A majority of MGE’s Non-Gaming Suppliers operate their businesses in North America.

Requirement (b): Policies and Due Diligence Processes

As described above, a large number of MGE’s vendors are required to be registered with the AGCO, and as such, are required to adhere to their established policies and guidelines to meet their various legal obligations.

In collaboration with the OLG and the Canadian Centre to End Human Trafficking, MGE has developed training for CSI employees who may have greater exposure to situations where human trafficking, including forced labour and sex trafficking, may be present. MGE endeavors to ensure that any indicators that are observed in the course of its business operations, and consequently its supply chains, are promptly reported and addressed.

In partnering with local law enforcement (“NRPS”), the Ontario Provincial Police (“OPP”), OLG and other stakeholders on a routine basis, MGE remains committed to supporting efforts to mitigate the risk of modern slavery, human trafficking and forced labour. Discussions with NRPS and the OPP provided valuable information on confirming appropriate protocols, and how MGE can assist the NRPS and OPP in those circumstances. Through informal conversation, formal meetings, notifications of incidents and hosting broader forums/events, MGE can evaluate the risks of human trafficking within its industry and the Niagara Region.

MGE remains alert to the risk of human trafficking, including forced labour and sex trafficking, within its facilities, and observant of risks within its supply chain. MGE’s policies and contracts have been amended to ensure that its vendors and stakeholders understand that MGE remains committed to assessing and mitigating the risk of modern slavery, human trafficking and forced labour.

Requirement (c): Force Labour and Child Labour Risks

MGE purchases products and services from a broad category of vendors that support gaming and hospitality operations. As is noted above, a majority of products and services are sourced and purchased from business operating within North America, with only less than one percent (1%) of Tier 1 vendors operating outside North America.

MGE outlines to its vendors that they are required to follow fair labour practices, as required in applicable legislation, within their business operations and supply chains. MGE considers potential risks of forced and child labour within its supply chains, especially when dealing with products and services that travel through multiple tiers of sourcing within certain segments. In an effort to ensure MGE is holding all Tier 1 vendors accountable in ensuring they are not participating in forced and child labour practices, MGE has updated its contractual and purchase order terms and conditions to outline its requirement that vendors are not participating in forced and child labour and adhere to all applicable laws.

Requirement (d): Remediation Measures

In MGE's assessment of its activities and supply chains, MGE takes the position that remediation measures are not applicable.

Requirement (e): Remediation of Loss of Income

In MGE's assessment of its activities and supply chains, MGE takes the position that vulnerable families have not experienced loss of income of income as remediation measures are not applicable.

Requirement (f): Training

In collaboration with the OLG and the Canadian Centre to End Human Trafficking, MGE has developed an approximately one (1) hour training program for CSI employees who may have greater exposure to situations wherein human trafficking, including forced labour and sex trafficking, may be present. The training was mandatory for primarily customer facing roles including but not limited to the following departments: Security, Surveillance, Housekeeping, Hotel, Limo/Valet Services, Servers/Bartenders, Table Games, Marketing, and Legal. While this training is mandatory for certain departments (approximately 976 employees) and optional for others, many employees who were not required to complete the training, chose to do on their own accord (approximately 444 employees, making the total amount of employees trained, being 1,420 employees, which is approximately half (1/2) of CSI's employees). MGE endeavors to ensure that any indicators that are observed in the course of its business operations, and consequently its supply chains, are promptly reported and addressed.

In May 2023, MGE launched an Anti-Human Trafficking Awareness week in support of Victims and Survivors of Crime week that focused on recognizing signs of human trafficking and how to report it. The message to all staff was that awareness and training are critical to protecting

vulnerable individuals and keeping human trafficking and other criminal activities out of MGE's business, and out of the gaming industry.

MGE has also created a Modern Slavery and Human Trafficking Statement for all employee that outlines the importance of MGE's commitment to global citizenship in ensuring that no form of modern slavery, human trafficking, or forced labour is used in its operations or supply chains.

Requirement (g): Assessing Effectiveness

MGE has a variety of measures it takes to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains. The measures include an Internal Audit department which is an independent department that takes a holistic review of MGE's policies and programs (one project at a time) to ensure assess, amongst other things, compliance with MGE's regulatory and legal obligations, including ensuring forced labour and child labour are not being used in MGE's operations or supply chains. MGE also has a Policy Review Committee that regularly reviews its policies and procedures to also ensure that MGE is adhering to its legal obligations, including ensuring forced labour and child labour are not being used in MGE's operations or supply chains. MGE has a Purchasing Department that specifically ensures that our supply chains do not use forced labour or child labour by making it a mandatory commitment under the purchase order terms and conditions.

Through informal conversations, formal meetings, notifications of incident and hosting broader forums/events, MGE can evaluate the risks of human trafficking within its industry and the Niagara Region. MGE's team members remain vigilant of the risks of human trafficking and forced labour within its facilities, but also observant of risks within its supply chain.

Attestation and Approval

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 or entities 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.

Date: May 31, 2024

Nav Sandhawalia

Nav Sandhawalia
Chief Compliance and Risk Officer
I have the authority to bind MGE Niagara
Entertainment Inc.