

2023 Report – Introduction

This report has been prepared by Vancouver Aquarium Ltd. (the “Aquarium”) in response to the reporting requirements under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for our financial year ending December 31, 2023.

The Aquarium recognizes that it plays an important role in preventing and assessing risk of forced labour and child labour in Canada’s supply chain, and we are committed to ensuring there is continuous improvement in our due diligence, risk assessment, remediation and training processes.

Organizational structure, activities and supply chain

Structure

The Aquarium is a for-profit private corporation operating primarily as a tourist attraction known as the *Vancouver Aquarium* (the “Facility”) and is part of the arts, entertainment and recreation industry. We are located in Vancouver, BC and have approximately 250 employees. The Aquarium meets all three criteria (assets, revenue, number of employees).

The Aquarium is owned and operated by Herschend Family Entertainment Corporation. It is governed by an independent Board of Directors and managed by a Leadership Team based in Vancouver, BC.

Activities

The Aquarium manages and operates the Vancouver Aquarium tourist attraction and carries out activities that include sale and distribution of goods in and outside of Canada, and the importation of goods into Canada.

Supply Chain

The Aquarium procures a range of goods and services, such as equipment, machinery and goods to maintain and operate the life support systems behind-the-scenes to care for our animals and to service our guests that visit our Facility.

Our direct suppliers are largely located within Canada; with certain specialized equipment our Facility requires, we work with third parties located outside of Canada to import a variety of mechanical, electrical equipment and related supplies. For our guests, we also import an assortment of retail goods from outside of Canada that are customized for our Facility.

Steps to prevent and reduce the risks of forced labour and child labour

In our financial year ending December 31, 2023, the Aquarium has taken the following steps to prevent and reduce the risk that forced labour and child labour in our operations and supply chain:

- Developing and implementing an action plan for addressing forced labour and/or child labour

- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chains; and
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

Policies and due diligence processes

The Aquarium has both a *People Handbook* and *Pay Policy and Procedures* that define standard hours of work and entitlements in accordance with BC Employment Standards Act, such as overtime pay and breaks; however, they do not directly address forced labour and/or child labour. For our supply chain that involves areas with high risks, our Director, Business Operations and Merchandise Head staff make purchasing decisions based on the best standards in the industry, which include getting goods from trustworthy suppliers and those who attend gift shows where we can interact with them directly instead of using a distributor. We also collaborate with suppliers who have shown and discussed with us how they deal with forced labour and/or child labour, limiting our purchases to vendors with established relationships.

Forced labour and child labour risk assessment

The Aquarium’s operations are located within Vancouver, Canada, and we have identified risks to the best of our knowledge within our supply chain:

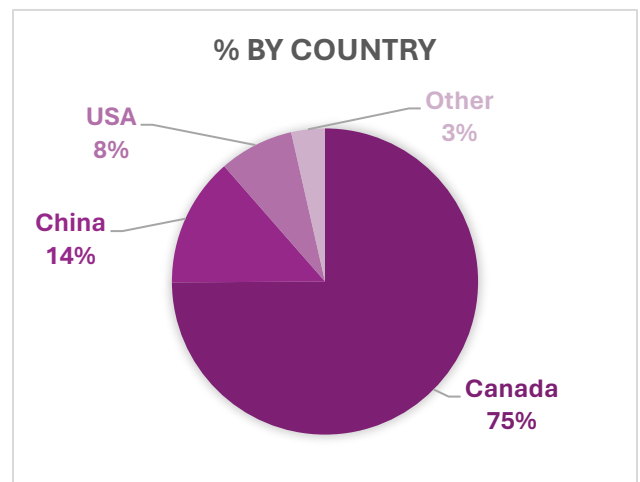
- Types of products we purchase and/or distribute and
- Location of our suppliers (and those further down the supply chain) that produce the goods we purchase and/or distribute.

This risk assessment used two separate indices to analyze the potential risk of child and/or forced labour related to goods and countries of origin - Walk Free’s Global Slavery Index and the US Department of Labor’s List of Goods Produced by Child Labor or Forced Labor.

- <https://www.walkfree.org/global-slavery-index/>
- <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods/supply-chains.>

Location:

Vancouver Aquarium’s material direct suppliers are predominantly located in Canada (75%) and the United States (8%) and other countries (3%) which is considered a low risk, while the remainder is from China (14%) considered extreme risk. Material direct suppliers, which, for the purpose of this report, are those suppliers that make up the top 90% of procurement spend.

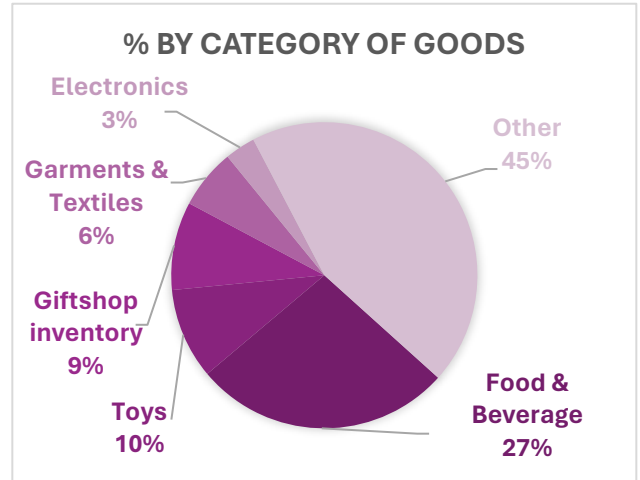


Category of Goods:

Per the 2022 List of Goods Produced by Child Labour or Forced Labour published by the US Department of Labor's Bureau of International Labor Affairs, some goods procured by Vancouver Aquarium include items rated as extreme risk such as Food & Beverage, Toys, Garments & Textiles, and Electronics.

Other factors:

- For products sourced from China, more than 97% is sourced from a single supplier; and
- Over 70% of our food and beverage purchases are with one supplier that partners with local ranchers, growers, and producers, and they are committed to creating positive changes with their corporate social responsibility initiatives.



This risk assessment revealed that one supplier poses a high risk (due to volume, location, and category of goods) and six other suppliers pose a medium risk (due to location and category of goods) of forced and child labour.

Remediation - Forced & child labour & vulnerable family income loss

To date, we have not identified instances of child labour or forced labour within its operations or those of its suppliers. We will continue to strive to identify emerging risks that include the sectors and industries that our current supply chains, especially with our high risk categories and its origin as mentioned above. For the Chinese supplier we have the highest spend with and supply high risk categories of goods, we obtained a copy of their Ethical Audit report from November 2023 that shows they received full score on Child Labour and Young Workers and Labour Practices sections, and there were no negative remarks.

For other suppliers that are deemed medium and high risk, we will seek documentation and/or accreditations they have or belong to that demonstrate their current labour practices. Should we be made aware of any issues regarding the behaviour or conditions within our supply chain, we are committed to promptly address such a situation by entering into discussions with the relevant party, investigating the facts and circumstances, developing appropriate corrective actions with the supplier and ensuring such corrective actions are implemented.

Employee training

Vancouver Aquarium has not yet developed training pertaining specifically to forced labour and/or child labour. Vancouver Aquarium recognizes the opportunity to enhance employee training relevant to this Act and will, therefore, evaluate and provide applicable training for executives and staff in 2024.

Ensuring effectiveness of processes

On May 31, 2024, we completed and reported our initial assessment of Bill S-211, and we remain committed to ongoing reviews of our processes, policies, and practices, including the assessment of our suppliers. This commitment is aimed at aligning with industry leading practices and mitigating our risks related to forced labour and child labour. Activities to enhance processes include:

- Enhancing the organization's policies and procedures in the next fiscal year to further strengthen and reduce the risk of forced and child labour within our activities and supply chains now and into the future.
- Developing and delivering a training program that is mandatory for employees making contracting and purchasing decisions.
- Develop a supplier code of conduct by end of 2024.
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators by end of 2027.

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 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.

I confirm that this report was reviewed by a Board member and I have the authority to sign on behalf of Vancouver Aquarium Ltd.



Clint Wright
Executive Director