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THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

PURPOSE

This report is the first report prepared by Cougs Investments Ltd ("Corporation") pursuant to Bill S-211, Canada's new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ending December 31, 2023. It sets out the initiatives the Corporation has taken to identify and address the risks of forced labour or child labour used in our supply chain(s).

STEPS TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR

The Corporation's primary activities are golf course operations including food and beverage sale together with commercial rental operations and management services for related operating entities. The Corporation's supply chain is primarily locally sourced. Together the Corporation prides itself on being a pillar in the community by providing superior quality and value to our guests and customers. We are committed to building lasting relationships with our community, employees, and customers.

The Corporation has policies and procedures in place to prevent and reduce the risks of forced labour and child labour within our operations and supply chains. The polices and procedures are applied to all operations within the Corporation. These include Human Rights, Health and Safety and Violence & Harassment in the Workplace. The Corporation also has recruitment practices in place to ensure all applicants are recruited voluntarily.

We have a zero-tolerance policy for human right abuses as outlined in our polices. The Corporation fosters a positive and productive work environment where diversity is valued, corporate culture is embraced, expectations and practices are set, and our employees are driven to continually strive for personal and professional growth. We are knowledgeable about our industry and take pride in the level of service we provide by constantly evolving to better serve our guests, customers, and vendors.

We recognize that our employees are the crucial ingredient to the quality and success of our products and services. We are committed to supporting the development of our employees both professionally and personally by recognizing the value that each employee brings to our organization. In doing so, we have created an organization with the ability to exceed the expectations of the company, our employees, and our customers.

The Corporation is committed to providing a barrier-free environment for all, including our clients, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act, 2005, and its associated regulations.

We understand that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices that we review annually. Providing an accessible and barrier-free environment is a shared effort, and we are committed as an organization to working with the necessary parties to make accessibility for all a reality.

The owners and leadership of the Corporation are committed to the health and safety of our employees. Protection of employees from injury, illness or occupational disease is a major continuing objective. The Corporation will make every effort to provide a safe, healthy work environment. The owners, managers, supervisors, workers, vendors, and contractors must be committed to the continuing objective of reducing the risk of injury.

The Corporation is committed to conducting business openly and ethically. We accomplish this by creating a workplace built on the strength of trust, accountability, and integrity in all our business practices. It is the responsibility of every employee to build and maintain this code of ethics by supporting and actively participating in the process.

We strive to protect all our employees, vendors, customers, and the company itself from any illegal or damaging actions committed by individuals either knowingly or unknowingly. The Corporation will not tolerate any wrongdoing or impropriety and will immediately take appropriate disciplinary action to correct the problem. The Corporation will not be party to the intent or appearance of unethical or compromising practices in its business relationships. Violence, harassment, or discrimination will not be tolerated,

The Corporation is committed to ensuring that every employee has a right to an environment that is free of discrimination, intimidation or harassment in the workplace because of race, ancestry, place of origin, national or ethnic origin, colour, religion, creed, citizenship, sex (including pregnancy or child birth), age, record of offences (which do not involve a conviction under The Criminal Code or other federal legislation for which a pardon has not been granted), marital status including cohabitation, widowhood and aspiration, family status, handicap, disability, sexual orientation, political belief, receipt of public assistance or any other prohibited ground.

The Corporation follows equal opportunity and fair hiring practices when filling positions, and to ensure the success of our business hires only the most qualified individuals. The Corporation has adopted this policy so that all employees and potential candidates are fairly and consistently considered for employment opportunities.

IDENTIFYING AND MITIGATING RISKS RELATING TO FORCED LABOUR AND CHILD LABOUR

Located in Ontario, Canada, Cougs Investments Ltd, is incorporated under the Ontario Business Corporations Act.

Our supply chain involves both local and national partners, and we ensure that we do not knowingly engage with any supplier who violates local or international laws and regulations, including those pertaining to environmental and employment standards. We aim to establish long-term relationships with our suppliers and clearly communicate our high standards and expectations.

We mandate that our key suppliers implement robust policies and processes against forced labor, child labor, slavery, and human trafficking. We expect them to perform due diligence that extends at least 'one level up' the supply chain, acknowledging that it is not always feasible for each supplier to maintain direct oversight over every input source.

We have a zero-tolerance policy towards forced labor and child labor. We require all entities within our supply chain to uphold our values in this regard and to fully comply with all relevant legal requirements, including those concerning labor practices, standards, and the prevention of bribery and corruption.

REMEDIATION MEASURES

As this is the Corporation's first year, we have not identified any incident of forced labour or child labour in our activities or supply chain, therefore we did not take any measures to remediate an incident of forced labour or child labour.

Going forward, if, the Corporation does identify any incident of forced labour or child labour within our activities or supply chains, we will consider the appropriate remediation strategies to ensure compliance with all standards and legislative requirements.

ASSESSING EFFECTIVENESS

We evaluate the effectiveness of our measures against forced labour and child labour through our annual risk assessment process.

OPERATIONS AND TEAM TRAINING

Our team is crucial to our business success, and we have several supportive policies in place for employees to adhere to, including our policy *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

The Corporation provides online training for all new employees. This training covers Violence & Harassment in the Workplace, Health & Safety, and the Code of Conduct. Management must complete this training every two years or when new laws are introduced. Although our Code of Conduct doesn't directly cover the Act, it emphasizes our dedication to maintaining the highest ethical standards for everyone working with the Corporation.

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the President of Cougs Investments Ltd.

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 period listed above.

I have the authority to bind Cougs Investments Ltd.

D. Scott Collins
President
Cougs Investments Ltd